

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-AFC-03
<b>Project Title:</b>	Black Rock Geothermal Project (BRGP)
<b>TN #:</b>	253192
<b>Document Title:</b>	Black Rock Geothermal Project Data Request Response Set 1 (Revised Responses to Data Requests) Notice Letter to ICAPCD
<b>Description:</b>	N/A
<b>Filer:</b>	Lindsey Xayachack
<b>Organization:</b>	Jacobs
<b>Submitter Role:</b>	Applicant Consultant
<b>Submission Date:</b>	11/17/2023 1:30:52 PM
<b>Docketed Date:</b>	11/17/2023



Black Rock Geothermal LLC  
4124 NW Urbandale Drive  
Urbandale, IA 50322

Jon Trujillo  
General Manager, Geothermal Development

November 14, 2023

Mr. Jesus Ramirez  
APC Division Manager  
Imperial County Air Pollution Control District  
150 South Ninth Street  
El Centro, California 92243

**RE: Notification for Permit Application to Construct for the Black Rock Geothermal Project, Imperial County, California**

Dear Mr. Ramirez:

Black Rock Geothermal LLC (the Applicant), an indirect, wholly owned subsidiary of BHE Renewables, LLC, submitted an Imperial County Air Pollution Control District (ICAPCD) Authority to Construct (ATC) Application for the Black Rock Geothermal Project (BRGP) on April 27, 2023. This application was submitted to ICAPCD in conjunction with an Application for Certification (AFC) that was filed with the California Energy Commission (CEC) on April 18, 2023<sup>1</sup>.

As part of its review of the ATC Application, ICAPCD issued an information request on September 29, 2023 for the BRGP. The Applicant responded to each of the specific information requests issued by ICAPCD on October 4, 2023, and November 10, 2023. Updated air quality emission estimates, air quality impact analyses, and health risk assessment modeling were submitted to ICAPCD as part of the response provided on November 10, 2023.

Recent updates have been made to the BRGP design which were not able to be incorporated into the revised analyses submitted on November 10, 2023. Specifically, the location and orientation of the offsite wells and associated well pads have shifted. A figure showing the latest BRGP well design layout is included as Attachment A.

These minor layout changes only pertain to offsite emission sources with limited operation and the number of offsite wells has remained the same. Therefore, the emission estimates, air quality impact analyses, and health risk assessment modeling submitted to ICAPCD on November 10<sup>th</sup> are considered to be conservative as well as representative of the updated BRGP design. For these reasons, the Applicant will not be submitting revised analyses for the updated BRGP design.

The Applicant looks forward to working with the ICAPCD during its ongoing review of the ATC Application for the BRGP. Please contact Anoop Sukumaran at (760) 348-4275 (email address: Anoop.Sukumaran@calenergy.com) or Andrew Dunavent at (707) 372-7810 (email address: Andrew.Dunavent@jacobs.com) if you have any questions or if you need additional information.

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<sup>1</sup> The CEC's website for the BRGP proceeding is available at <https://www.energy.ca.gov/powerplant/steam-turbine/black-rock-geothermal-project-brgp>.



Black Rock Geothermal LLC  
4124 NW Urbandale Drive  
Urbandale, IA 50322

Jon Trujillo  
General Manager, Geothermal Development

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jon Trujillo', with a stylized flourish at the end.

Jon Trujillo  
General Manager, Geothermal Development

cc: Anoop Sukumaran/BHE Renewables  
Jerry Salamy/Jacobs  
Andrew Dunavent/Jacobs  
California Energy Commission

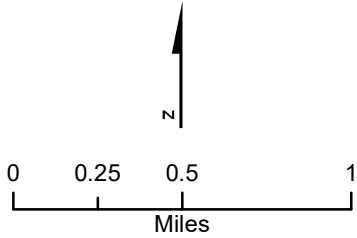
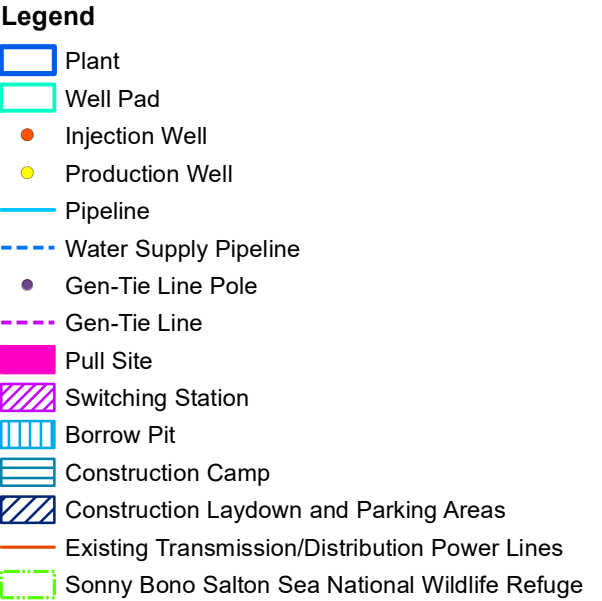
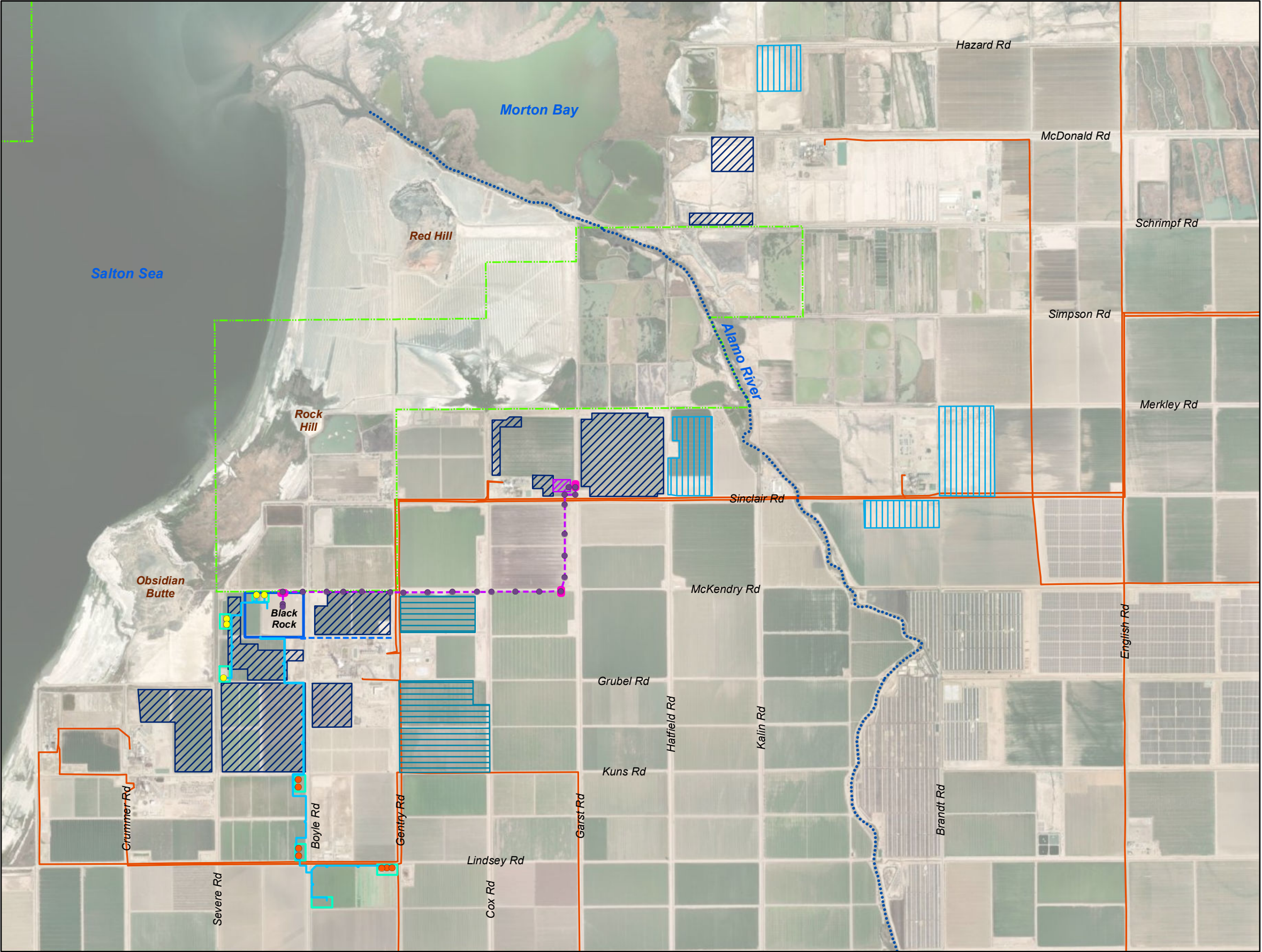


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## Attachment A: Revised BRGP Well Layout





**Figure 1-4R**  
**Project Location**  
**Black Rock Geothermal Project**  
Imperial County, California