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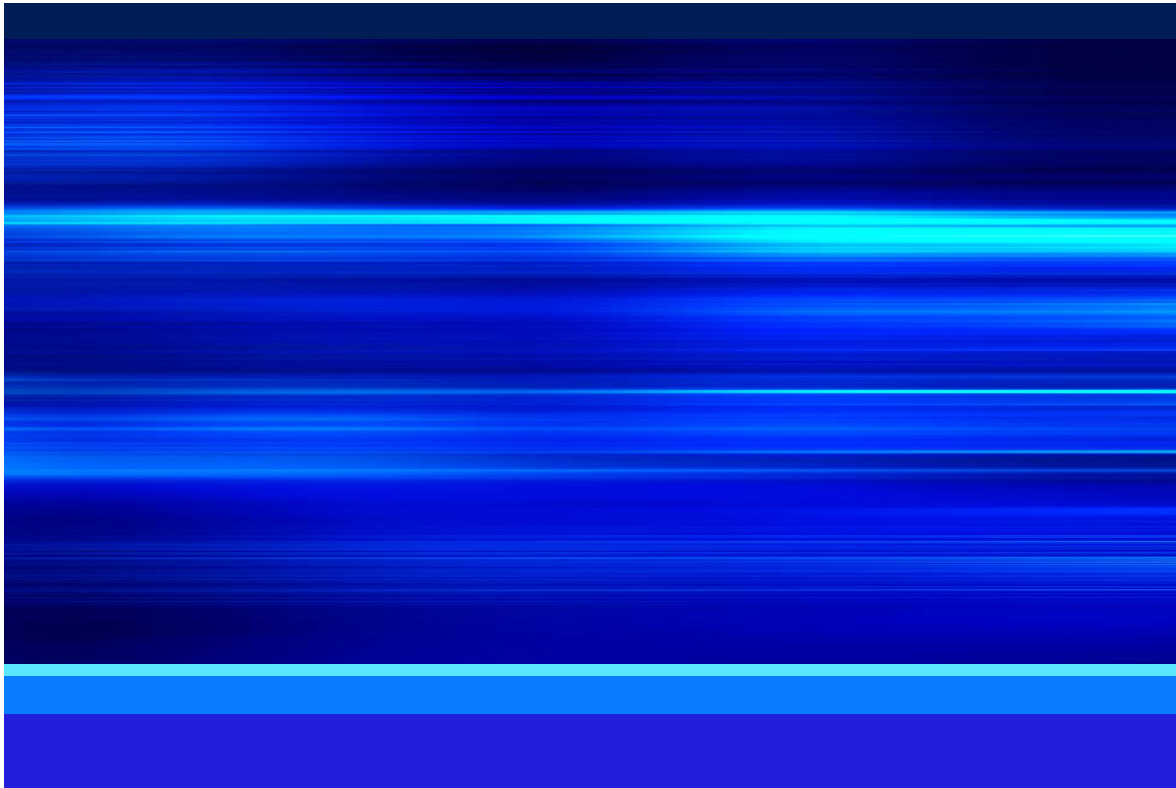
Data Response Set 2 (Revised Responses to Data Requests 5 and 6)

Submitted to
California Energy Commission

Prepared by
Elmore North Geothermal LLC

With assistance from
Jacobs

Elmore North Geothermal Project
(23-AFC-02)
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Introduction

Attached are Elmore North Geothermal LLC's¹ (Applicant) responses to the California Energy Commission (CEC) Staff's *Data Requests Set 2* regarding the Application for Certification (AFC) for the Elmore North Geothermal Project (ENGP) (23-AFC-02). This submittal includes revised responses to Data Requests 5 and 6.

The responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as presented *Data Requests Set 2* and are keyed to the Data Request numbers.

New or revised graphics or tables are numbered in reference to the Data Request number. For example, the first table used in response to Data Request 28 would be numbered Table DRR 28-1. The first figure used in response to Data Request 28 would be Figure DRR 28-1, and so on. Figures or tables from the ENGP AFC that have been revised have a "R" following the original number, indicating a revision.

Additional tables, figures, or documents submitted in response to a data request (for example, supporting data, stand-alone documents such as plans, folding graphics, etc.) are found at the end of each discipline-specific section and are not sequentially page numbered consistently with the remainder of the document, though they may have their own internal page numbering system.

¹ An indirect, wholly owned subsidiary of BHE Renewables, LLC ("BHER").

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2. Land Use (DR 5-6)

Background: Agricultural Land Uses (DR 5-6)

The application states in Section 5.11.1.4.1 that the project site is an active agricultural site currently planted with Bermuda Grass crop. Section 5.11.1.4.1 also states that the ENGP power plant, adjacent production and injection well pads, associated pipelines, the IID switching station, gen-tie line, borrow pits, laydown areas, and construction camps are in, or traverse through, areas designated as Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance. Disturbance at the laydown yards, construction camps, and borrow sites would be temporary, as these sites would be restored back to pre-construction conditions or conditions specified by the landowner after construction. However, permanent disturbance would occur at the power plant site and the IID switching station, with a permanent loss of 50.63 acres of Prime Farmland and 91.57 acres of Farmland of Statewide Importance, according to Table 5.11-2 in Section 5.11.1.1 of the application. Although some of this farmland conversion would be specific to the ENGP, part of this conversion would result from facilities shared by the three geothermal facilities, including the IID switching station.

Data Requests:

5. *Please describe current land uses at the sites that would be permanently converted from Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance. If currently or recently used for agriculture, please discuss the crops currently and/or recently farmed.*

Response: Several parcels that will be used for Project facilities such as the geothermal plant, well pads, pipelines, switching station, water pipelines, and gen-tie lines are currently farmed and located on Prime Farmland or Farmland of Statewide Importance. As discussed in Data Request Response Set 2, docketed on 10/27/23 (TN# 252808), a request was made to the Imperial County Agricultural Commissioner for a list of crops currently and historically farmed within the past five years at these locations. Table DRR-5 Permanent Project Use – Farmland Crops for the ENGP provides the information received from the County.

6. *Please describe current land uses at the sites where Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance would be temporarily disturbed. If currently or recently used for agriculture, please discuss the crops currently and/or recently farmed.*

Response: Several parcels that will be used for construction laydown, construction camps, and parking areas are currently farmed and located on Prime Farmland or Farmland of Statewide Importance. As discussed in Data Request Response Set 2, docketed on 10/27/23 (TN# 252808), a request was made to the Imperial County Agricultural Commissioner for a list of crops currently and historically farmed within the past five years at these locations. Table DRR-6 Temporary Project Use – Farmland Crops for the ENGP provides the information received from the County.

Table DRR-5 Permanent Project Use - Farmland Crops for the ENGP

Location	APN	Township	Range	Sections	Farmland type	Permanent Uses ¹						Crops				
						Project Site	Well Pad	Well Pipelines	Gen-tie Lines	Water line	Switching Station	2019	2020	2021	2022	2023
Elmore North	020-100-038	11 South	13 East	27	Urban & Prime & Statewide	x	x	x	x	x	x	Bermuda Seed	Bermuda Seed	Bermuda Seed	Bermuda Seed, Wheat	Bermuda Seed
Elmore North	020-100-043	11 South	13 East	27	Other & Prime & Statewide		x	x				Bermuda Seed	Bermuda Seed	Alfalfa	Alfalfa	Alfalfa
Elmore North	020-120-007	11 South	13 East	35	Prime Farmland		x	x				Alfalfa	Sugarbeet	Sugarbeet	Sugarbeet, Wheat	Alfalfa
Elmore North	020-120-009	11 South	13 East	35	Prime & Statewide		x	x				Alfalfa, Alfalfa Seed	Alfalfa, Alfalfa Seed	Alfalfa, Alfalfa Seed	Alfalfa, Alfalfa Seed	Alfalfa
Elmore North	020-120-040	11 South	13 East	34	Prime		x	x	x			Lettuce (head)	Alfalfa	Alfalfa	Alfalfa	Alfalfa
Elmore North	020-120-046	12 South	13 East	3	Prime		x	x				Alfalfa, Alfalfa Seed, Bermuda Grass, Bermuda Seed	Alfalfa, Alfalfa Seed, Bermuda Grass, Bermuda Seed	Alfalfa, Alfalfa Seed, Bermuda Grass, Bermuda Seed	Alfalfa, Alfalfa Seed, Bermuda Grass, Bermuda Seed	Alfalfa, Alfalfa Seed, Bermuda Grass, Bermuda Seed
Elmore North	020-120-061	11 South	13 East	34	Prime & Statewide & Urban			x	x			Bermuda Seed	Bermuda Seed	Bermuda Seed	Bermuda Seed	Bermuda Seed
Elmore North	020-120-062	11 South	13 East	34	Prime & Statewide & Urban			x	x			Bermuda Seed	Bermuda Seed	Bermuda Seed	Bermuda Seed	Bermuda Seed
Notes:																
1. Project features do not necessarily cover the entirety of the parcel.																

Table DRR-6 Temporary Project Use - Farmland Crops for the ENGP

Location	APN	Township	Range	Sections	Farmland type	Temporary Uses			Crops				
						Laydown ⁵	Camp ⁵	Borrow Pit ^{1,5}	2019	2020	2021	2022	2023
Auxiliary	020-100-036	11 South	13 East	26	Farmland of Statewide Importance	x		X	Sugarbeet	Alfalfa, Alfalfa Seed	Alfalfa, Alfalfa Seed, Sugarbeet	Alfalfa, Sugarbeet, Wheat	Alfalfa, Sugarbeet
Auxiliary	020-100-038	11 South	13 East	27	Urban & Prime & Statewide	x			Bermuda Seed	Bermuda Seed	Bermuda Seed	Bermuda Seed, Wheat	Bermuda Seed
Auxiliary	020-110-008	11 South	13 East	33	Prime & Statewide & Local	x			Alfalfa	Alfalfa	Alfalfa Alfalfa Seed	Alfalfa, Alfalfa Seed, Sugarbeet	Alfalfa, Alfalfa Seed, Bermuda Seed, Forage Hay/Silage
Auxiliary	020-110-031	12 South	13 East	4	Prime & Statewide	x			Alfalfa Seed	Potato, Alfalfa Seed	Potato, Alfalfa Seed	Sugarbeet, Alfalfa	Sugarbeet, Alfalfa
Auxiliary	020-110-035	11 South	13 East	33	Urban, Prime & Statewide	x			Alfalfa	Alfalfa	Alfalfa	Alfalfa, Wheat	Alfalfa
Auxiliary	020-110-039	12 South	13 East	5	Urban & Farmland of Statewide Importance	x			Alfalfa	Alfalfa	Alfalfa	Alfalfa, Sugarbeet	Alfalfa
Auxiliary	020-110-055	11 South	13 East	33	Prime & Statewide & Local & Other	x			Alfalfa	Alfalfa	Alfalfa	Alfalfa	Alfalfa
Auxiliary	020-110-046	12 South	13 East	4	Prime Farmland	x			Bermuda Seed	Bermuda Grass, Bermuda Seed	Bermuda Grass	Bermuda Grass	Bermuda Grass
Auxiliary	020-120-054	11 South	13 East	34	Prime & Statewide		x		Alfalfa, Hemp/Cannabis	Hemp/Cannabis	Onion Seed	Sugarbeet	Alfalfa
Auxiliary	020-120-056	12 South	13 East	3	Prime		x		Bermuda Seed	Bermuda Seed	Bermuda Seed	Wheat	Bermuda Seed
Auxiliary	020-120-057	12 South	13 East	3	Prime & Statewide & Local		x		Bermuda Seed	Bermuda Seed	Bermuda Seed	Bermuda Seed, Wheat	Bermuda Grass
Auxiliary	020-010-035	11 South	13 East	13	Other Land ⁴			x	No crops ²	No crops ²	No crops ²	No crops ²	No crops ²
Auxiliary	022-100-011	11 South	14 East	30	Farmland of Local Importance ²			x	No crops ²	No crops ²	No crops ²	No crops ²	No crops ²
Auxiliary	020-120-049	11 South	13 East	36	Farmland of Local Importance ²			x	No crops ²	No crops ²	No crops ²	No crops ²	No crops ²
Auxiliary	020-100-037	11 South	13 East	26	Farmland of Local Importance ^{2,3}			x	No crops ²	No crops ²	No crops ²	No crops ²	No crops ²

Notes:

1. Borrow pit acreage has decreased in size since the submittal of the AFC in April 2023. Updated boundaries are shown in Figure 1-4R of the Elmore North Geothermal Project Revised General Arrangement Refinement Package TN #253187

2. No crops = No records for the past 5 years were provided by the Imperial County Agricultural Commission for these parcels, however the Agricultural Commission was able to identify that the parcels have not been farmed and are currently dirt.

3. One borrow pit is split between two APNs, 020-100-036 and 020-100-037. The portion of the borrow pit on parcel 020-100-036 is located on Prime Farmland and Farmland of Statewide Importance. The portion of the borrow pit on parcel 020-100-037 is located on Farmland of Local Importance and has not been farmed in the past five years and is dirt.

4. Other Land is defined as land not included in any other mapping category. Examples include, but are not limited to, rural developments; brush, timber, and areas not suitable for livestock grazing; strip mines and borrow pits; and water bodies smaller than 40 acres.

5. Project features do not necessarily cover the entirety of the parcel.