

DOCKETED

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TN #:	256844
Document Title:	Mojave Solar Project - Data Requests, Set 2
Description:	Data Requests, Set 2 for the Mojave Solar Project Petition to Amend for the Construction of Two New Evaporation Ponds
Filer:	Ashley Gutierrez
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**CALIFORNIA
ENERGY COMMISSION**



**CALIFORNIA
NATURAL
RESOURCES
AGENCY**

June 13, 2024

Mahnaz Ghamati, Compliance Manager
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42134 Harper Lake Road
Hinkley, California 92347

Data Requests Set 2, for Mojave Solar Project (09-AFC-05C) Addition of Two New Evaporation Ponds

Dear Mahnaz Ghamati:

The California Energy Commission (CEC) staff, in consultation with Lahontan Water Board staff, is requesting additional information to supplement Data Responses Set 1, ([TN #256766](#)) specified in the enclosed data requests. The information is needed for the staff analysis of the Mojave Solar Project petition to amend ([TN# 253750](#), [TN# 253751](#), and [TN# 253752](#)) to construct two new permanent evaporation ponds, one at Alpha block and one at Beta block.

These data requests seek further information in the area of water resources, based on the contents of the petition to amend.

To ensure a timely environmental review, CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please let me know within 10 days of receipt of this letter.

If you have any questions, please email me at ashley.gutierrez@energy.ca.gov.

Ashley Gutierrez
Ashley Gutierrez
Compliance Project Manager

Enclosure: Data Requests

MOJAVE SOLAR PROJECT (09-AFC-05C) DATA REQUESTS, SET 2

WATER RESOURCES

Author: James Ackerman

BACKGROUND

Follow-up to Data Request, Set 1, Request No. 4: The statement in the Mojave Solar Project's (MSP) data request response "*The top berm surface of the proposed evaporation ponds will be sloped at a minimum 1% away from the pond*", indicates it was assumed that the request was referring to the berm profile. However, CEC's statement in the data request background ([TN #256766](#), page 4) was referring to the longitudinal direction of the berm.

DATA REQUEST

1. Please indicate whether the top of the berms of the proposed evaporation ponds will be designed with a slope in the longitudinal direction, or whether the top will be nearly level in the longitudinal direction. The explanation needs to address the entire perimeter of both ponds.

BACKGROUND

Follow-up to Data Request, Set 1, Request No. 6 ([TN #256766](#), p. 4): MSP staff did not adequately address the data request. To state that MSP has remained within the freshwater use limitations of the COCs does not answer the question of how much additional feed water has been used since the closed-circuit reverse osmosis (CCRO) system modification and why. Similarly, presenting data comparing water use versus megawatt hours does not answer the question regarding possible increased treatment plant water use.

Regarding the "Outflow" data presented in the tables on page 7 of the data request response, CEC staff had asked for data justifying why the CCRO-system modification was not the reason for an increase of discharge to the evaporation ponds. MSP did not provide this information. Moreover, analysis of the data provided in response to Data Request 6 indicates that discharge to the Alpha evaporation ponds increased by about 4.32 million gallons between 2019 (14.55 million gallons) and 2021 (18.87 million gallons).

Regarding the presented operating pressures before and after the CCRO-system modification, there was no explanation why the range of reverse-osmosis vessel pressure ranges increased on the low end by 15 psi and on the high end by 345 psi. Also, no discussion was provided regarding what possible effect this may have had on other equipment.

MOJAVE SOLAR PROJECT (09-AFC-05C) DATA REQUESTS, SET 2

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2. Explain why the increase of feedwater to the water treatment plant was not the result of the CCRO system modification.
3. Provide data demonstrating that the CCRO system modification has not resulted in increased discharge to the evaporation ponds.
4. Explain why operating pressures increased after the CCRO system modification.
5. Provide a discussion regarding possible effect the change in pressures may have on other equipment.

LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD

Author: Kerri O'Keefe

BACKGROUND

Lahontan Regional Water Quality Control Board (LRWQCB) staff provided the following questions to better understand the existing monitoring well network and the wells associated with the construction of the two new evaporation ponds. The direction of groundwater flow at the site is approximately N15°W. Therefore, the new wells should be installed in a northwesterly direction from the ponds.

DATA REQUEST

6. Are there monitoring wells installed downgradient of the existing evaporation ponds? Would new wells be installed downgradient of the new evaporation ponds?

BACKGROUND

Based on Figure 8 and Figure 9 of the revised Sampling and Analysis Plan, it appears that Alpha 2 is screened through the confining layer (basalt) between the upper and lower regional aquifers. If contamination reaches this well, it has the potential to pull the contamination through the upper aquifer down to the regional aquifer. The distance from the well to the ponds and treatment units exceeds 2000 feet, however, monitoring Alpha 2 for a release would be prudent. Alternatively, MSP could have this well sealed through the confining layer to prevent cross contamination.

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7. Are the existing wells constructed in a manner that prevents vertical migration of contaminants through the confining layers to the drinking water aquifer?
8. How would the new wells be constructed?
9. What actions would be taken to prevent vertical migration of contaminants?