

DOCKETED

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Project Title:	Compliance - Application for Certification of DWR Bottlerock Geothermal Project
TN #:	269450
Document Title:	Data Requests Set No 8 - Hazardous Materials, Worker Safety & Fire Protection, and Wildfire
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Filer:	Anwar Ali
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April 9, 2026

Brady Olson
Chief Executive Officer
Open Mountain Energy
3451 N Triumph Blvd STE 201
Lehi, Utah 84043

Data Requests Set No. 8 - Bottle Rock Geothermal Power Plant (79-AFC-04C)

Dear Brady Olson:

The California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests which is necessary for the staff analysis of the Bottle Rock Geothermal Power Plant petition to amend (PTA) (TN # 262318). The Mayacma Geothermal, LLC, proposes to construct and operate a 7.5-megawatt (MW) Binary Geothermal Power Plant within the Bottle Rock Power Plant (BRPP) site.

These Data Requests seek further information in the areas of Project Description and the operational profiles for both the proposed 7.5 MW Binary project as well as the CEC-licensed 55 MW BRPP, based on the information provided in the PTA.

To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA (see Cal. Code Regs., tit. 14, §§ 15108, 15109), the 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.

**DATA REQUESTS – SET NO. 8 – HAZARDOUS MATERIALS
MANAGEMENT. WORKER SAFETY & FIRE PROTECTION, AND
WILDFIRE
BOTTLE ROCK GEOTHERMAL POWER PLANT (79-AFC-04C)**

If you have any questions, please email me at anwar.ali@energy.ca.gov.

Anwar Ali

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Enclosure: Data Requests – Hazardous Materials Management, Worker Safety & Fire Protection, and Wildfire.

DATA REQUESTS – SET NO. 8 – HAZARDOUS MATERIALS MANAGEMENT. WORKER SAFETY & FIRE PROTECTION, AND WILDFIRE

BOTTLE ROCK GEOTHERMAL POWER PLANT (79-AFC-04C)

Technical Area: Hazardous Materials Management

Author: Katherine Lewis, P.G., C.E.G.

BACKGROUND: The Petition to Amend (PTA), Section 3.5 – Hazards and Hazardous Materials discusses the findings of a Phase I Environmental Site Assessment (ESA) titled *Phase I Environmental Site Assessment for Bottle Rock Geothermal Facility*, prepared by Wood for the site in 2022, Project No. 2281400507.

DATA REQUEST

1. Provide a copy of the Phase I ESA for the Bottle Rock Geothermal Facility for Staff review.

BACKGROUND: California Code of Regulations, title 20, Appendix B (g)(10)(A) requires a list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material. The PTA, Section 3.5 – Hazards and Hazardous Materials states that “the types and volume of hazardous materials used and stored on site would be similar to or less than those analyzed in Order 79-AFC-4 and subsequent amendments due to the smaller geothermal generation capacity of the amended BRPP and associated reduction in demand and use of hazardous materials”.

DATA REQUEST

2. Provide an updated list of all hazardous materials that would be used or stored on site during construction and operation of the proposed project. Include the quantity of each hazardous material. If exact quantities are not currently known, please provide an estimated quantity, noted as such.
3. Provide a discussion of the toxicity of all hazardous substances that would be used or stored on site.

Technical Area: Wildfire

Author: Katherine Lewis, P.G., C.E.G.

BACKGROUND: The proposed project is located in a very high fire hazard severity zone (VHFHSZ). The PTA, Section 3.5 – Hazards and Hazardous

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Materials discusses the reduction of fire hazard by maintenance of defensible space surrounding the site in compliance with the California Department of Forestry and Fire Protection (CALFIRE) requirements and the Geysers Wildland Fire Operating Plan developed by the Geysers Power Company, LLC, Northern California Power Agency, Ormat, and AltaRock, and the Sonoma-Lake Napa Unit of CalFire.

DATA REQUEST

4. Provide a copy of the most recently updated Geysers Wildland Fire Operating Plan for Staff review.

Technical Area: Worker Safety and Fire Protection

Author: Michele Shi, P.E.

BACKGROUND: The PTA (TN 262182) states that existing BRPP fire protection systems would be used, maintained, and tested as part of the proposed petition to amend. The PTA Subsection 2.4, Fire Protection, further describes the existing fire protection system including “two existing fire hydrants on the north side of the cooling tower.” However, the PTA lacks sufficient detail on all existing BRPP fire protection systems. Staff requires a comprehensive assessment of the existing BRPP fire protection systems in order to evaluate potential mitigation measures.

The Final Decision dated November 5, 1980, Appendix F, lists the applicant-proposed fire protections systems including the features listed below. Staff requires confirmation of all currently installed BRPP fire protection systems.

- Automatic water sprinklers installed above the turbine lube, hydraulic and seal oil reservoirs, generator seal, oil unit, and in cooling tower.
- Automatic CO₂ purge in the oil purification room.
- Carbon dioxide gas purge for the generator.
- Automatic water-spray deluge system for transformers.
- Fire hose stations, manually operated fire extinguishers placed at various yard locations, in the turbine building, and on the cooling tower deck.

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- Water will be taken from the cooling tower basin by three pumps, each sized for full expected fire flow. Two pumps will be driven by electric motors and the third by a standby diesel generator.
- All lube oil storage and oil filled equipment will be surrounded by impermeable berms.

DATA REQUEST

5. Provide a comprehensive list of all water-based fire protection systems (e.g. deluge, wet pipe, dry pipe, pre-action sprinkler systems, private fire service main, standpipe and hose) installed at the BRPP. Specify the sprinkler system riser locations and the area each system protects.
6. Provide a comprehensive list of all engineered and pre-engineered fixed extinguishing systems (e.g. carbon dioxide, Clean Agent, etc.) installed at the BRPP.
7. Clarify which fire protection systems the project owner proposes to return to service, abandon in place, or decommission as part of the proposed project. Specify the applicable laws, ordinances, regulations, and standards (LORS) to ensure the fire protection systems are returned to service in an operable condition in accordance with applicable LORS.

BACKGROUND: The PTA Section 3.14, Worker Health and Safety, states the proposed project “would include installation of sprinklers for any new equipment containing more than 500 gallons of oil.” The PTA Subsection 2.2.3, Cooling Tower and Groundwater Supply Wells and Pipelines, describe proposed changes to the cooling tower and cooling tower water supply, such as updated circulation pumps and additional groundwater supply wells. Staff requires an evaluation of the proposed fire water supply system and its relationship to the proposed changes to the existing BRPP cooling tower.

DATA REQUEST

8. Provide a description of the existing BRPP cooling tower. Include information on the cooling tower material construction, fire protection and wildfire mitigation systems, and its contribution to the fire water supply system.
9. Provide a description of the proposed fire water supply system. Include information on the water source, water supply capacity, and the system

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- requirements (including minimum fire flow in gallons-per-minute, pressure, and duration). Specify the worst-case fire scenario used to establish the system requirements.
10. Confirm the proposed changes to the cooling tower and cooling tower water supply would not result in adverse impacts to the fire water supply system for the proposed project.