March 12, 2010

Alan Solomon Project Manager California Energy Commission 1516 Ninth Street Sacramento, CA 95814

RE: Palen Solar Power Project, Docket No. 09-AFC-7 Responses to January 14, 2010 CEC Workshop Queries (Groundwater) Technical Areas: Soil & Water Resources



Dear Mr. Solomon:

On March 11, 2010 Solar Millennium submitted responses to the January 14, 2010, CEC Workshop staff requests for additional information and clarification on several matters specific to local groundwater issues. It was discovered that the text portion of that submittal was from a prior submittal responding to related workshop queries regarding water resources, and therefore incorrect. The figures and tables submitted were in fact correct and the accompanying CD included all the correct material. Only the printed text was provided in error.

At your direction, we are resubmitting the entire package electronically. Please note that the text in this submittal is to supplant the text of the prior submittal of the same name.

If you have any questions on these data responses to the staff's workshop queries, please feel free to contact me directly.

Sincerely,

Alice Harron Senior Director, Development



1625 Shattuck Avenue, Suite 270 Berkeley, CA 94709-4611

Responses to CEC Workshop, January 14, 2010 Soil and Water Resources (Groundwater)

Palen Solar Power Project

Docket No. 09-AFC-7

Alice Harron Senior Director of Project Development 1625 Shattuck Avenue, Suite 270 Berkeley, CA 94709-1161

Groundwater Data Responses to January 14, 2010 CEC Workshop Queries – Palen Solar Power Project

Is RO permissible for dust control?

In an email to Paul Marshall of the CEC on February 11, 2010, Jennie Snyder of the Colorado River Regional Water Quality Control Board (RWQCB) indicated the discharge of RO brine for dust control would not be allowed. Solar Millennium is planning to have additional discussion of the decision with the RWQCB, though for the time being alternative options for brine management are being considered. In the event that the brine is managed using an evaporation pond or for any discharge of brine to land, the Board will require a Report of Waste Discharge (ROWD). Further, the RWQCB will also require a ROWD for the discharge to the septic and leach field even though the County of Riverside will permit the septic systems for the Project. This is because the proposed discharge is in excess of 5,000 gallons per day, and as per protocol the County would refer the project to the RWQCB who would require a ROWD. The ROWD for septic will be prepared in conjunction with the RO brine discharge ROWD and will be submitted upon determination by Solar Millennium of the brine management option.

Further discussion of where the LTU leachate/runoff will be discharged/disposed and analysis required prior to discharge (DR-S&W-199).

Excess wastewater or rain fall may occasionally accumulate in the land treatment unity (LTU). The LTU has been constructed with 2-foot high berms such that storm water will not drain into or from the LTU. Based on the frequency of storms in the area, it is anticipated that accumulation of rainwater within the containment would occur on a yearly basis. Each LTU is designed with a sump which will collect storm water runoff and/or leachate within the bermed area. Any storm water that accumulates within the LTU will be sampled for HTF (biphenyl and diphenyl ether) and amendment constituents (i.e., nitrate, phosphate, TDS). Sampling of the storm water will be conducted within 24 hours of the storm event and laboratory analyses will be run on a 24-hour turn-around-time. Standing water will be removed from the LTU within 48 hours. Following analytical results, free liquids will either be used as raw water feed in the process supply or removed using a vacuum truck. If HTF is not detected above the practical quantitation limit (PQL) and amendment concentrations are at or near background groundwater concentrations and below State of California primary or secondary maximum contaminant levels the water may be used as raw water feed in the plant process. If HTF is detected and amendment concentrations exceed background or drinking water standards, the waste will be properly disposed of at a licensed treatment storage and disposal facility.

Update the runoff recharge estimates (DR-S&W-194) to reflect 2, 5, and 10% of total calculated runoff value. Use the Basin inflow/outflow example from Genesis (WorleyParsons 2009b).

A revision to the water balance provided in the January 6, 2010 response to Data Request (DR)S&W-194 for the Chuckwalla Valley Groundwater Basin (Basin) was made to reflect a change in the estimate of infiltration from precipitation after Hely and Peck (1964) and to reflect the results of fieldwork in the northern portion of Palen Dry Lake completed by WorleyParsons (2009b). No other changes were made to the water balance estimates included in the January 6 response to DR-S&W-194.

In revising the infiltration estimate, the first step was to overlay the average annual isoheytal contours shown on Figure 6 from Hely and Peck (1964) onto the topography of the Chuckwalla Valley Groundwater Basin (Basin) (Figure DR-S&W-194-1 [rev1]). The second step was to multiply the

average annual precipitation within each contour times the area of the contour to derive an estimate of total precipitation in acre-feet for the Basin. Lastly, the total within each contour is multiplied by percentages of 3%, 5% and 10% representing an estimate of infiltration from precipitation within the contour and summing the individual areas to a total annual infiltration volume (acre-feet) for the Basin. Table DR S&W-194-1 (rev1) presents the estimate of total annual infiltration for the Chuckwalla Valley Groundwater Basin for these estimates of infiltration which vary from about 8,600 acre-feet (3%) to 28,600 acre-feet (10%). The infiltration estimate of 3% of precipitation compares favorably to the value estimated by WorleyParsons (2009a, Table DR-151-2) of 9,440 acre-feet.

In addition to changes made to the estimate of infiltration, the estimate of evapotranspiration (ET) and discharge through Palen Lake was revised, as the prior estimate appears to have been overly conservative. In the water balance provided on January 6, 2010, a discharge estimate of between about 1,000 and 2,000 acre-feet per year was provided under the assumption of ET rates of four to six inches, that shallow groundwater was present below the entirety of Palen Lake (4.260 acres), and with the entire lake acting as a wet playa. This estimate has been revised to reflect field work completed by WorleyParsons (2009b), and the mapping provided by Steinemann (1989) whose data suggests that water may be present at shallow depths below only about one half of the dry lake. In their investigation of Palen Lake in December 2009 (WorleyParsons 2009b), shallow hand-augured borings dug in the northern part of the lake encountered groundwater at a depth of about 8 feet below ground surface. In general, with uniform fine-grained soil conditions, at this depth, groundwater can discharge through capillary action and evaporation through a playa to a depth of about 10 feet (Lohman 1972, Todd 1980). Water level data from 1989 tend to corroborate shallow groundwater conditions below the north part of the lake (Steinemann 1989). However, water level contours suggest groundwater is present at depth of about 20 to 25 feet below the central and southern part of the lake. This suggests that only a portion of the lake, may be acting as a wet playa rather than the entire lake.

From their field survey of salt occurrence, results of the shallow boring program, and the absence of vegetation, Worley Parsons (2009b) concluded that 2,000 acres or about one-half of Palen Lake could be acting as a wet playa. Using Franklin Playa in Death Valley (Czarnecki 1997) as a model and revising the estimates of ET reported at Franklin considering the differences in water level data between the two areas, and adjusting for conditions in seasonality, WorleyParsons (2009b) concluded that about 350 acre feet per year (afy) could be discharging through the playa. This appears to be a reasonable estimate given that many of the features attributable to wet playas are absent from Palen Dry Lake.

From these changes, Table DR-S&W-194-2(rev1) approximating the Basin water balance was updated. The results of the update under an assumption that mountain front recharge would be about 3% of precipitation within the Basin, shows that there is a net surplus of water of about 2,200 acrefeet in the Basin water balance without the Palen Solar Power Project (PSPP), and about 1,900 acrefeet with the PSPP. Given the changes in water balance, the forecast water budget for the Basin as shown in Table 5.17-12(rev1) was updated using the revised balance as the baseline for year 2010. In the revised forecast, the recharge and discharge elements were not changed over the baseline year. This provides a conservative estimate in the forecast in that water use in parts of the Basin may decline through reduction in agriculture and at the Ironwood prison (GEI 2009). The forecast shows that during the construction period between 2011 and 2013, the PSPP will be about 35% of the total renewable water (i.e., amount of water recharge) during that period, and about 5% of the total water demand. Following construction of the PSPP, the operational water supply of about 300 acrefeet/year will represent between 3% and 8% of the total renewable water use, depending on the pumping schedule from other projects in the Basin after 2013. During operation, PSPP water supply represents about 1% to 2% of the total estimated demand within the Basin.

The cumulative demand from all the current and expected future sources result in a net annual and cumulative water budget deficit for the Basin beginning in 2014 and extending through 2043. The

maximum annual deficit is about 7,500 acre-feet, and is coincident with the onset of the proposed Eagle Crest Pump Storage project and the initial infilling of the lower ponds of the Eagle Crest project. Upon completion of all the proposed renewable projects, the annual deficit is about 1,300 acre-feet per year. Depending on the assumption of aquifer storativity, the cumulative decline in the average water level across the Basin after 30 is between less than about 0.5 foot and about 2 feet (Table 5.17-12[rev1]). It is anticipated that the water level decline would be greater in the areas of higher water demand both adjacent to current pumping centers and in the area of the renewable projects, and lesser further away from the pumping locations. Given its fractional contribution to the total water use, the PSPP does not represent a cumulatively considerable contribution to the water resource impacts to the Basin.

GEI, 2009, Eagle Mountain Pumped Storage Project No 13123 - Final License Application, Technnical Appendices for Exhibit E, Volume 3 of 6 Groundwater Supply Pumping Effects.

A.G. Hely and E.L. Peck, Precipitation, Runoff and Water Loss in the Lower Colorado River-Salton Sea Area, Geological Survey Professional Paper 486-B, 1964 (Hely & Peck, 1964).

Lohman, S. W., 1972, Ground-Water Hydraluics: Geological Survey Professional Paper 708: United States Geological Survey, Alexandria, Virginia.

Steinemann, A.C., 1989, Evaluation of Non-potable Groundwater in the Desert Area of Southeastern California for Powerplant Cooling. U.S., Geological Survey Water Supply Paper 2343. 44 pages.

Todd, D. K., 1980, Groundwater Hydrology, Second Edition: John Wiley and Sons, New York, New York.

WorleyParsons, 2009a, Data Requests – Response Set 1A, Genesis Solar Power Project, Riverside County, California. December 14.

WorleyParsons, 2009b, Technical Memorandum – Groundwater Resources Cumulative Impacts Analysis for Genesis Solar Power Project, Riverside County, California. December 30.

Provide evidence that Project water demand can be met without impact to nearby wells or creating Basin overdraft.

The groundwater model that was provided in the data response dated January 6, 2010, was revised to reflect an updated interpretation of the distribution of transmissivity within the Basin. Bedinger et al 1989, in their mapping of the Chuckwalla Valley show a zone of fine-grained sediment below Palen Dry Lake extending from the surface to the Mesozoic basement rock (Cross Section E-E'). Simoni (1981) described two test well borings (Palen Lake No.1 and No.2) dug south-southeast of the lake, just north of the PSPP site as being predominantly fine-grained to depths of 425 and 505 feet below the ground surface, respectively. The results of the borings by Simoni (1981) generally reflect similar fine-grained conditions that were encountered in the drilling of the observation wells dug as part of the PSPP AFC pumping test program. Additionally, the low-well yield experienced during the pumping test on former agricultural well 5S/17E-33N01 is suggestive of lower transmissivity conditions and fine-grain materials, although it is probable that the well condition and age (installed in 1958) contributed to well performance.

These data along with published data from across the Basin were used to refine and remap the transmissivity zones for the groundwater model (see Figure DR-S&W-207-3). The lower transmissivity value from the Project's recent aquifer test (1,000 ft²/d) was applied to Zone 1, which

includes the PSPP site and Palen Dry Lake, as well as the area around Ford Dry Lake. Apart from this area, the lower transmissivity value previously determined by USGS (6,300 ft2/d) (Leake et al. 2007) was applied to Zone 2, which includes areas east and west of the central low-transmissivity zone. This value appears to be a reasonable approximation of transmissivity data reported in these areas in the western and eastern portions of the Chuckwalla Valley. In addition to the published transmissivity data shown on Figure DR-S&W-207-3, available pumping data and specific capacity data were used to map the transmissivity across the Valley (see Figure DR-S&W-207-4). Higher pumping rates reported in the area of CocoPah Farms were used to demark higher transmissivity zones due west of the PSPP site. It is important to emphasize that the numerical modeling is a 2-D simulation and as such the transmissivity values are uniformly applied through the model domain and assumed constant through the vertical extent of saturated sediments. This represents a conservative approach to the analysis of water supply and impacts from the Project, as it presumes vertical uniformity of aquifer characteristics that are not documented in the hydrostratigraphy for the Basin. The Basin shows significant heterogeneity and possibly higher transmissive sediments at depth below the Project and in the central portion of the Basin.

The "Project Only" and "Cumulative Projects" simulations were modeled following the pumping schedule shown on Table DR-S&W-207-1(rev1). The pumping schedule was updated based on information provided on the BLM Palm Springs South Coast Field Office website posted on December 21, 2009, under the "First-in-Line" Solar Applications and approved project applications. The PSPP pumping was distributed among four wells within the Project Right-of-Way (ROW), as this would more closely approximate actual conditions and because multiple wells will be required in what appears to be a low-transmissive aquifer both for construction and operational water supply. No other parameters within the model were changed over what was provided in the January 6, 2010 data response. The results of the modeling were provided for transient simulations of post- construction (model year 2013), mid-Project operations (year 2029) and at the end of 30 years of Project operation (year 2043). The electronic model files are provided in Attachment A.

Project-Only Simulation

The "Project Only" simulation presents the predictive results from the stress applied to the model from the proposed project pumping as shown on the schedule provided in Table DR-S&W-207-1(rev1). The radius of influence for the "Project Only" simulation shows that after construction period and proposed water use of about 480 afy over three years the drawdown to the one-foot contour remains within the PSPP (Figure DR-S&W-207a[rev1]). At the end of operation the one-foot contour extends outward to encompass the area of CocoPah Farms, but the five-foot contour remains within the PSPP (Figure DR-S&W-207b[rev1]). The one-foot contour does not encroach into the northern portion of Palen Dry Lake and into the area where there are reportedly mesquite trees. These simulations show that the PSPP would not be expected to significantly impact offsite water supply wells using a significance threshold of a drawdown of five feet or more.

The storage change was also calculated using the model flow budget. The largest net change occurs at the end of operation and the change represents about 10,500 acre-feet (Table DR-S&W-207-2 [rev1]). Assuming a total recoverable storage of 15,000,000 acre-ft in the basin (DWR, 1979), the impact of basin storage is insignificant even for the largest storage change at the end of Project operation (0.07%). As described above, the Project would not induce overdraft of the groundwater basin, as there is an estimated net surplus of water of about 2,000 acre-feet per year based on current estimates of recharge and discharge within the Basin (Table DR-S&W-194-2(rev1)).

Cumulative Projects Simulation

The "Cumulative Projects" simulation presents the predictive results from the stresses applied to the model from the multiple projects proposed for the Basin at the pumping schedule shown on the schedule provided in Table DR-S&W-207-1(rev1). The projects listed are those that have been identified as planned and reasonably foreseeable projects located with the Basin. The cumulative

impacts assessment begins with current conditions and applied the pumping stresses as scheduled to the model through a period of 30 years. The model results are shown in Table DR-S&W-207-2(rev1). As shown on Figure DR-S&W-208a(rev1) at the end of construction the drawdown to the one-foot contour remains within the PSPP. While the figure does not show it, as the model was tied to the water supply schedule for the PSPP, a cone of depression would be anticipated in the area of the pumping well or wells that would provide the initial water supply for the Eagle Crest Pump Storage project. At the end of the operation the influence from pumping at the PSPP extends beyond the site to within an area of CocoPah farms, but the five- foot drawdown contour remains within the site (see Figure 208b[rev1]). Similar to the results of the project-only simulation, offsite water supply wells are not impacted by the PSPP to a threshold of significance greater than five feet of drawdown. Additionally, the model suggests that there could be a water level change of between one and five feet in the area of the Mesquite population on the northern margin of Palen Dry Lake. The model shows that the influence for this change comes from pumping to the west and the Eagle Mountain Pumped Storage project and not the PSPP.

Larger cones of depression are developed around the Genesis and Eagle Mountain Pump Storage Project as would be anticipated given their higher operational water supply requirements. The concept of depression developed around the Genesis is likely exaggerated due to the application of a low transmissivity value for Zone 1 in this area. As noted above, the uniform application of transmissivity in a 2-D model is a conservative approach and the model prediction should not be considered a water table response. Site conditions would suggest that water for the PSPP would be produced from deeper sediments below an upper fine-grained zone that serves as an aquitard within the central and eastern portion of the Basin.

Storage change was also calculated using the model flow budget. As can be seen, the largest net change occurs at the end of operation (year 2043) and the change from all the Projects represents about 142,000 acre-feet. Assuming a total recoverable storage of 15,000,000 acre-ft in the basin (DWR 1979), the impact of basin storage is insignificant even for the largest storage change at the end of operation (about one %). As noted above, given its minor contribution, the PSPP does not contribute significantly to the change in storage for the Basin.

Provide site specific well testing at yield levels that support Project water demand.

Access for additional well testing was requested through the BLM on February 19, 2010. Initial discussions with the BLM indicate that because of past PSPP survey work on the site, a Determination of NEPA Adequacy (DNA) could be utilized to conduct the additional investigation. The request has been was made for multiple additional test wells with the initial test well proposed in the PSPP Unit #2 Power Block. Additional wells and their location will be based on the results of the installation and pumping test on the initial test well in the Unit #2 Power Block. A surface geophysical program, extending the work done for the Genesis Project westward onto the PSPP site will be conducted prior to the installation of the first test well. The investigation will be conducted to better characterize the hydrostratigraphy below the site, the depth of the bedrock and the water table to the north of the site in the direction of Palen Dry Lake.

Discuss thresholds of significance for impacts associated with drawdown (DR-S&W-233).

Discussion during the workshop revealed that a threshold of significance was not necessarily appropriate given concern over potential drawdown in the northern portion of Palen Dry Lake in an area of dissected playa where a population of mesquite trees has been mapped. It is important to note that a drawdown of five feet is appropriate for assessment of significance with respect to the potential for

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impact to adjacent water wells. As noted above, a drawdown of five feet or more is not predicted beyond the PSPP boundary even after 30 years. This five-foot drawdown value has been used in many other CEC projects as a measure of significance, and as the basis for needing mitigation measures.

As regards consideration of a drawdown that could affect vegetation in the area of the dissected playa on the north margin of Palen Lake the following are offered:

- The population of mesquite trees is many miles (about five to eight miles) north of the PSPP. The recent groundwater model shows that pumping will not induce a drawdown of more than 0.1 foot in the northern portion of the playa.
- Below Palen Dry Lake, shallow groundwater (<10 feet in depth) is probably present on the northern portion of the lake. Mapping by Steinemann (1989) showed that water is present at depths below 10 feet in the central and southern part of the playa.
- For most Phreatophytes, the depth to groundwater is an important factor and variations of 2 to 6 feet in ground water levels could have adverse affects in root growth as well as survival. Vegetation of this type was not reported by WorleyParsons (2009a) in their assessment of the Palen Dry Lake. As noted above, no such drawdown variation is predicted by the PSPP groundwater model.
- In comparison, mesquite, which are present in the dissected area of the playa are a deep rooted plant known to send roots 50 feet or more in search of water. This effectively buffers the plant to slight variations in groundwater levels, particularly in the case of adult trees that are established (Pers. Communication, Jonathan Campbell February 2, 2010).
- Well data from well 5S/17E-6C01 indicate stable groundwater conditions on the north side of Palen Dry Lake. The water level history for this well has spanned several years including periods of higher pumping in support of agriculture both in the area of Desert Center and pumping at CocoPah Farms west of the PSPP. The hydrograph however, appears to reflect a regional response to changes in basin wide pumping not the local pumping to the west. Similarly, it would be anticipated that the pumping at the PSPP would not affect the water levels this far north of the site.

Given the distance to the mesquite tress, their deep rooted character, absence of other vegetation on the northern margin of the playa, and the model prediction showing that the PSPP will not induce drawdown of 1 foot or more in the areas of the trees, a threshold of significance less than five feet does not appear justified.

Campbell, Jonathan, Personal Communications, Dr. Campbell, Campbell and Associates, Los Angles California. February 3, 2010.

Steinemann, A.C., 1989, Evaluation of Nonpotable Groundwater in the Desert Area of Southeastern California for Powerplant Cooling. U.S., Geological Survey Water Supply Paper 2343. 44 pages.

WorleyParsons, 2009b, Technical Memorandum – Groundwater Resources Cumulative Impacts Analysis for Genesis Solar Power Project, Riverside County, California. December 30.

Attachment A

MODFLOW Files

(See Modeling Files)

Figures



- Highway / Major Road

1 inch = 380,160 inches

Date: February 2010

12 Miles

Groundwater Basin























Geographic/Cultural Area of Interest







Tables

TABLE DR-S&W-194-1 (rev1) SUMMARY OF INFILTRATION ESTIMATES CHUCKWALLA VALLEY GROUNDWATER BASIN PALEN SOLAR POWER PROJECT RIVERSIDE, CALIFORNIA

	Area	Mean	Total Volume	Runoff Curve Classification	Total Volume	Total Volume	Total Volume	Total Volume
	(acres)	Annual	of Rainwater		of Infiltration	of Infiltration	of Infiltration	of Infiltration
l avor ¹		Precipitat	from Mean		(AcFt) Based	(AcFt) Based	(AcFt) Based	(AcFt) Based
Layer		ion	Annual Precip		on 2% of	on 3% of	on 5% of	on 10% of
		(inches)	(AcFt)		Annual Precip	Annual Precip	Annual Precip	Annual Precip
unit1-cw	30,303	5	12.626	Alluvium, Steep Slope	253	379	631	1,263
unit1-cw	211.498	4	70.499	Alluvium, Flat Slope	1.410	2.115	3.525	7.050
unit1-cw	41.073	3.5	11.980	Alluvium, Steep Slope	240	359	599	1.198
unit1-cw	12,077	4	4,026	Alluvium, Steep Slope	81	121	201	403
unit1-cw	910	4	303	Alluvium, Steep Slope	6	9	15	30
unit1-cw	194	4	65	Alluvium, Steep Slope	1	2	3	6
unit1-cw	81,233	5	33,847	Alluvium, Steep Slope	677	1,015	1,692	3,385
bedrock-chuckwalla	32,001	5	13,334	Mountains	267	400	667	1,333
bedrock-chuckwalla	21,456	5	8,940	Mountains	179	268	447	894
bedrock-chuckwalla	11,050	5	4,604	Mountains	92	138	230	460
bedrock-chuckwalla	109	5	46	Mountains	1	1	2	5
bedrock-chuckwalla	9,246	4	3,082	Mountains	62	92	154	308
bedrock-chuckwalla	10,042	4	3,347	Mountains	67	100	167	335
bedrock-chuckwalla	282	4	94	Mountains	2	3	5	9
bedrock-chuckwalla	3,480	4	1,160	Mountains	23	35	58	116
bedrock-chuckwalla	275	4	92	Mountains	2	3	5	9
bedrock-chuckwalla	90	4	30	Mountains	1	1	1	3
bedrock-chuckwalla	398	4	133	Mountains	3	4	7	13
bedrock-chuckwalla	316	4	105	Mountains	2	3	5	11
bedrock-chuckwalla	39,340	5	16,392	Mountains	328	492	820	1,639
bedrock-chuckwalla	194	5	81	Mountains	2	2	4	8
unit3-cw	28,973	3	7,243	Alluvium, Flat Slope	145	217	362	724
unit2-cw	198,558	3	49,640	Alluvium, Steep Slope	993	1,489	2,482	4,964
bedrock-chuckwalla	89,161	6	44,581	Mountains	892	1,337	2,229	4,458
Totals	822,257		286,248		5,725	8,587	14,312	28,625

Notes

Bedrock and unit distribution within the Chuckwalla Valley Groundwater Basin are shown on Figure Dr-S&W-194-1(rev1).

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Palo Verde										
		Mean						Total Volume	Total Volume	Total Volume
		Annual	Total Volume of					of Infiltration	of Infiltration	of Infiltration
		Precipitat	Rainwater from		Runoff		Total Annual	(AcFt) Based	(AcFt) Based	(AcFt) Based
Layer ID See		ion	Mean Annual	Runoff Curve	Curve	Runoff (% of	Volume of	on 2% of	on 5% of	on 10% of
Figure J3-1	Area (acre	(inches)	Precip (AcFt)	Classification	Number	preciptation)	Runoff (AcFt)	Annual Precip	Annual Precip	Annual Precip
unit1-pvm	23,695	4	7,898	Alluvium, Steep Slope	74	3.5%	276	158	395	790
bedrock-pvm	5,624	4	1,875	Mountains	93	29.1%	546	37	94	187
bedrock-pvm	16,819	6	8,409	Mountains	93	29.1%	2,447	168	420	841
bedrock-pvm	13,571	4	4,524	Mountains	93	29.1%	1,316	90	226	452
bedrock-pvm	18,298	4	6,099	Hills	83	10%	610	122	305	610
unit1-pvm	79,574	5	33,156	Alluvium, Steep Slope	74	3.5%	1,160	663	1,658	3,316
unit2-pvm	382	4	127	Hills	83	10%	13	3	6	13
unit2-pvm	122,370	4	40,790	Alluvium, Flat Slope	69	2%	816	816	2,039	4,079
Totals	280,332		102,878				7,184	2,058	5,144	10,288

Layer	acreage	area_sqft
unit1-cw	30,303	1320002743.44
unit1-cw	211,498	9212833369.72
unit1-cw	41,073	1789142528.84
unit1-cw	12,077	526058812.18
unit1-cw	910	39641479.81
unit1-pvm	23,695	1032152345.57
unit1-cw	194	8443225.22
unit1-cw	81,233	3538514482.92
bedrock-chuckwalla	32,001	1393943702.58
bedrock-chuckwalla	21,456	934623172.53
bedrock-chuckwalla	11,050	481350332.09
bedrock-chuckwalla	109	4767047.89
bedrock-chuckwalla	9,246	402742865.63
bedrock-chuckwalla	10,042	437418376.08
bedrock-chuckwalla	282	12276607.76
bedrock-chuckwalla	3,480	151571007.92
bedrock-chuckwalla	275	11964135.40
bedrock-chuckwalla	90	3912598.02
bedrock-chuckwalla	398	17318994.45
bedrock-chuckwalla	316	13784939.02
bedrock-chuckwalla	39,340	1713660284.08
bedrock-chuckwalla	194	8443225.22
bedrock-pvm	5,624	244970650.36
bedrock-pvm	16,819	732615560.10
bedrock-pvm	13,571	591160710.00
bedrock-pvm	18,298	797066150.51
unit1-pvm	79,574	3466236442.09
unit2-pvm	382	16626030.69
unit3-cw	28,973	1262054663.00
unit2-cw	227,531	9911247064.79
unit2-cw	28,973	1262054663.00
unit2-pvm	122,370	5330421580.05
bedrock-chuckwalla	89,161	3883866675.68

TABLE DR-S&W 194-2 (rev1) WATER BALANCE CHUCKWALLA VALLEY GROUNDWATER BASIN PALEN SOLAR POWER PROJECT RIVERSIDE COUNTY, CALIFORINA

	MOUNTAIN FRONT MOUNTAIN FRONT			WATER BALANCE ESTIMATES REPORTED BY OTHERS (Acre-feet pre year)							
RECHARGE AND DISCHARGE	APPLICATION FOR CERTIFICATION (AUGUST 2009)	AFTER HELY AND PECK (1964) - RECHARGE 3% OF RUNOFF	AFTER HELY AND PECK (1964) - RECHARGE 2% OF RUNOFF	BASIS FOR ESTIMATE	Metzger, et al., 1973 USGS Professional Paper 486-G	CH2MHill, 1996 ⁹	B&V, 1998	URS, 2000	GEI, 2009	WorleyParsons (2009a) ¹¹	
	Acre-feet per year	Acre-feet per year	Acre-feet per year								
	1 000	100	100	After LIDS (2000). Selected lower of the two estimates to provide a concentrative estimate of rephares from this source		1 700		100 to 1 000	1 700		
	2,500	2 500	2 500	After CH2M Hill (1996) and CEI (2009)		1,700		100 10 1,000	2 500 - 3 200	3,500	
	2,300	2,300	2,500	Assumed to inflow from Cadiz, though CH2M-Hill (1996) concluded flux into the Chuckwalla from this basin		2,500	0		2,300 - 3,200		
PERCOLATION from	Ū	•	, v			2,300	-		-		
	584	639	639	Estimated to be 10% of the annual usage of 6 389 AEY (GEI 2009) - assumed drip irrigation efficiency of 90%						800	
	0	0	0	Assumed to be zero. Construction of Lake Tamarisk uncertain, as such assume complete containment.							
MOUNTAIN FRONT ⁴	5.540	8.587	5.725	See Table DR-S&W-194-1(rev1)					5.540	9.440	
LEACHFIELD RETURN ⁵	834	834	834	After GEI (2009)					834	831	
BEDROCK	0	0	0	Although recharge to the alluvial aquifer is possible from the bedrock there is insufficient well data to determine flux.							
TOTAL (INFLOW) ⁶	10,458	12,660	9,798			12,240			10,571 to 11,331	14,571	
DISCHARGE (OUTFLOW)		•									
UNDERFLOW to PALO VERDE MESA ⁶	400	400	400	After Metzger (1973). Value assumed over multiple investigations.	400	400	400		400	400	
DIVERSION											
AGRICULTURE	5,840	6,389	6,389	After GEI (2009) Table 10 - Technical Exhibit E, Volume 3 of 6.				-	6389	10471	
MUNICIPALand DOMESTIC ^{7,8}	3,351	3,351	3,351	After GEI (2009) - compilation of estimates for Desert Center, Lake Tamarisk (CSA 51) and Prisons				-	3351	10471	
EVAPOTRANSPIRATION								-			
Palen Dry Lake ¹⁰	0	350	350	After WorleyParsons 2009b. Evaporation from Palen Dry Lake based on assumption that 1/2 the lake is acting as a wet playa (2,000 acres), and the discharge is seasonal occuring 3 months during the year with an ET rate of about 2 inches.		-	-	-		350	
Ford Dry Lake	0	0	0	Evaporation from Ford Dry Lakes assumed to be zero as depth of water estimated to be greater than 50 feet bgs.							
EXPORT	0	0	0	No export is indicated in published reports			-			-	
PALEN SOLAR POWER PROJECT	300	300	300	Operational requirements (mirror, process and domestic supply)/Dry Cooled Project.							
TOTAL (OUTFLOW)	9,591	10,490	10,490		400	400	400		10,140	11,221	
NET WITHOUT PSPP	867	2,170	-692			0		-	765 to 1,525	3,350	
NET WITH PSPP WATER USE	567	1,870	-992								
NOTES 1 CH2MHill (1996) and GEI (2009) underf URS calculation based on hydraulic con Lower value used in the estimate as not 2 CH2MHill (1996) and GEI (2009) underf 3 CH2MHill (1996) and GEI (2009) underf 4 GEI (2009) assumed 10% of precipitatio 5 This estimate reflects personal commun 6 Underflow calculated by Metz, et. al (197 7 Water supply well for Eagle Mountain St 8 CSA 51 - County Service Area 51 9 Total estimated inflow reported by CH2M 10 Loss from Palen Dry Lake is discussed i 11 Estimate of water balanced after Worley REFERENCES Application for Certification for the Palen Solar Power Project, Septe Black and Veatch and Woodward-Clyde, 1998, Phase I Technical Fi CH2M-Hill, 1996, Appendix C1 - Technical Memorandum, Elaboratic GEI, 2009, Eagle Mountain Pumped Storage Project No 13123 - Fin Hely and Peck, 1964, Precipitation, Runoff and Water Loss in the LC Met	low estimates from "Gro ductivity range of 10 to 1 ed by the analysis provid low estimates from "Gro ed on Cadiz Valley being n falling on the mountair ication from GEI with De '3). using transmissivity thool is screened in bed Hill (1996) from BLM ar n detail in response to th Parsons (2009a). Total mober 2009. easibility Report for Off-5 on on Specific Hydrogeo nal License Application, T wer Colorado River - Sa na, California and Nevad skwalla Valley Groundwa s Solar Power Project, R	undwater Conditions in the Ei 100 ft/day, gradient of 0.0002/ ded in Data Request DR-194 undwater Conditions in the Ei g similar size to Pinto Valley. In front would recharge grounc apartment of Public Health an of 30,000 gpd/ft (for Bouse Fi rock aquifer, not included in C and Riverside County EIS/EIR he work shop request to cons Diversion (agriculture and do Stream Storage on the Colora logic Concepts Discussed in Technnical Appendices for Ex alton Sea Area, Geological St da: U.S. Geological Survey Pr ater Conjunctive-Use Project, Rivreside County, California. E acts Analysis for Genesis Sol	agle Mountain Area" after Mar t/ft, an aquifer width of 11,000 for analysis in the Hely and Pe agle Mountain Area" after Mar lwater (value used in the AFC d personnel for prisons and as prmation), gradient of 3 feet/m iEl (2009) estimate for the Eagle Mountain Landfil der revision to the water balan mestic) of 10,471 afy (Table E do River Aqueduct. the Eagle Mountain Landfill ar hibit E, Volume 3 of 6 Ground irvey Professional Paper 486- ofessional Paper 486-J. Prepared for Metropolitan Wa pecember 14 (Table DR-148 a a r Power Project. Riverside Co	 In J. C., 1986 (no confirmation estimates provided). I feet and a saturated thickness of 500 feet. eck (1964) analysis of recharge. In J. C., 1986 (no confirmation estimates provided). September 2009). For estimates of recharge after Hely and Peck (1964) refer to Table DR-Soil and Water-194-1. ssuming 150 gallons/person/day for Lake Tamarisk/Desert Center/Eagle Mountain. ile, and a 4-mile width and 500 foot depth for the saturated section. II. nce and the estimate of runoff (February 2010). DR-148/DR-151-2) differs from future water budget estimate of 9,871 afy (Table 2, WorleyParsons 2009b)) 							

TABLE 5.17-12 (rev1) CUMULATIVE WATER BUDGET CHUCKWALLA GROUNDWATER BASIN **RIVERSIDE COUNTY, CALIFORNIA**

						WATER USE - SOLAR and OTHER RENEWABLE PROJECTS (AFY)										COMMENTS					
PROJECT ¹	PROPONENT	BLM SERIAL ID	TECHNOLOGY	SOURCE	USE	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2043	
Chueleuelle Celee I	Churchenelle Colori I I I C	CA 40000		Crews dweter	Construction		20	20	10												Updated from CEC email (12-16) transmitting Table
Chuckwalla Solar I	Chuckwalla Solar I LLC	CA 48808	Photovoltaic (200MVV)	Groundwater	Operational			5	7	10	10	10	10	10	10	10	10	10	10	10	Applications, BLM (12-21-09)
Facla Mauntain Calail 8	an¥aa	CA 40401	Photovoltoia (100MM))	Croundwater	Construction			10	10												Updated from CEC email (12-16) transmitting Table
Eagle Mountain Soleir	enaco	CA 49491		Groundwater	Operational					5	5	5	5	5	5	5	5	5	5	5	Applications, BLM (12-21-09)
Desert Lilv Soleil ⁸	enXco	CA 49492	Photovoltaic	Groundwater	Construction			20	20	20											Updated from CEC email (12-16) transmitting Table
Desert Lity Bolen		0.11 10 102			Operational						5	5	5	5	5	5	5	5	5	5	Applications, BLM (12-21-09)
Solel Mohave Solar Park	Deset Lily	CA 49494	Parabolic Trough (500MW)	Groundwater	Construction																Project withdrawn. Application rejected (First-In-Line Solar Applications, BLM (12-21-09))
					Operational																
Desert Sunlight Solar Farm	First Solar	CA 48649	Photovoltaic (550MW)	Groundwater	Construction		9	9	9												- "Cumulative Projests - I-10 Corridor" and First-In-Line Solar
					Operational					3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	3.8	Applications, BLM (12-21-09)
Eagle Mountain Pump Storage	Eagle Crest Energy Company, LLC	PAD/FERC	Pump - Storage (1300MW)	Groundwater	Construction					8,066	8,066	8,066									- "Cumulative Projests - I-10 Corridor" and First-In-Line Solar
		(bandary 2003)			Operational								1802	1802	1802	1802	1802	1802	1802	1,802	Applications, BLM (12-21-09)
Genesis Solar Energy	Genesis Solar LLC	CA 48880	Parabolic Trough (250MW)	Groundwater	Construction		813	813	813												- "Cumulative Projests - I-10 Corridor" and First-In-Line Solar
				Groundwater or water	Operational					1,644	1,644	1,644	1,644	1,644	1,644	1,644	1,644	1,644	1,644	1,644	Applications, BLM (12-21-09)
Mule Mountain Solar Project	Bullfrog Green Energy, LLC	CA 49097	Photovoltaic (500MW)	trucked in for mostly	Construction		20	20	20											0.7	- "Cumulative Projects - I-10 Corridor" and First-In-Line Solar
				mirror washing	Construction			10	0.5	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	Applications, BLM (12-21-09) Updated from CEC email (12-16) transmitting Table
Mule Mountain Soleil	enXco	CA 49488	Photovoltaic (200MW)	Groundwater	Operational			10	10		5										"Cumulative Projests - I-10 Corridor" and First-In-Line Solar
					Construction		480	480	480												Updated from CEC email (12-16) transmitting Table
Palen Solar Power	Solar Millennium LLC	CA 48810	Parabolic Trough (484MW)	Groundwater	Operational					303	303	303	303	303	303	303	303	303	303	303	- "Cumulative Projests - I-10 Corridor" and First-In-Line Solar
			TOTAL WA	TER USE - RENEWABI	E PROJECTS (AFY)	2 0	1.342	1.388	1.380	9.755	9.740	9.740	3.476	3.476	3.476	3.476	3.476	3.476	3.476	3.476	
			D	SCHARGE FROM OTH	ER SOURCES (AFY) ³	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	10,490	1
		RECHARGE (AFY)	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660	12,660				
		LY BALANCE (AFY)	5 2,170	828	782	790	-7,585	-7,570	-7,570	-1,306	-1,306	-1,306	-1,306	-1,306	-1,306	-1,306	-1,306				
				CUMULA	TIVE CHANGE (AFY)	2,170	2,998	3,780	4,570	-3,014	-10,584	-18,153	-19,459	-20,764	-22,070	-23,375	-24,681	-25,986	-27,292	-53,402	
	CUMULATIVE	BASINWIDE CHANG	E IN WATER LEVEL (assumi	ng a storage coefficier	t of 0.20) (INCHES) ⁷	0.2	0.30	0.4	0.5	-0.3	-1.0	-1.8	-1.9	-2.1	-2.2	-2.3	-2.4	-2.6	-2.7	-5.3	
	CUMULATIVE	BASINWIDE CHANG	E IN WATER LEVEL (assumi	ng a storage coefficier	t of 0.05) (INCHES) ⁷	0.9	1.2	1.5	1.8	-1.2	-4.2	-7.2	-7.7	-8.2	-8.8	-9.3	-9.8	-10.3	-10.8	-21.2	
NOTES																					
1 2 3 4 5 6 7 8	Chuckwalla Solar I (Chuckwalla Solar Desert Lily Soleil (enXco5) - Plan of Desert Lily (Solel) - Plan of Develop Desert Sunlight Solar Farm (First Sc Eagle Mountain Pump Storage Proje Genesis Solar Energy (Genesis Sola Mule Mountain Solar Project (Bullfror Mule Mountain Soleil (enXco2) - Pla Palen Solar Power Plant - Estimates Sum of projected water use by year Discharge from other sources other Estimate of recharge from basin wat Difference between discharge (inclu Cumulative difference between rech Change in the regional water level for There is conflict between the CEC a	ar I LLC) - Plan of Deve Development, Desert L ment, Mojave Solar Par ylar) - Plan of Developm ect - Estimates provided ar LLC) - Plan of Develop g Green Energy, LLC) - n of Development, Mule s provided from the AEC for the identified renew than solar or renewable ter balance provided on sive of renewable proje arge and discharge. Jlowing the equation sh nd BLM lists as to whet	lopment, Chuckwalla Solar I, f ily Soleil Project, October 2000 k/Desert Lily Project, October 2008. I from the Eagle Mountain Pun opment, Genesis Solar Energy - Plan of Development, Mule M e Mountain Soleil Project, enXi 20M Water, "Water Wastewate able energy projects. e energy projects (see Table D Table DR-S&W-194-2 (rev1). cts and other sources) and rec nown below (Fetter 1988). Neg her these projects will be perm	ebruary 2009. 3. 2007. Project, June 2009. Iountain Solar Project, No co February 2009. ar Report - Palen Solar F R-S&W-194-2 (rev1)). A Recharge was assumed tharge. gative numbers indicate a itted. They have been i	. 13123 - Final Licens lay 2009 Yower Project July 200 ssumption is that the d to be constant over 3 a decline or reduction included for completen	e Applicatio 99 (Appendi: discharge k 30 years. in the water ress though	on, Eagle Cr x L). Rept constar r level by th they may w	est Energy It over the t le amount s vell not be p	Company term of the shown. part of the c	June 2009 (analysis (30 sumulative v	EIS Table I years). vater budge	14). et for the Cf	nuckwalla V	alley Grour	ndwater Bas	in.					
AFY AF FERC LLC MW ESTIMATE OF BASINWIDE W/ V = A*S*dh	Acre feet per year Acre feet - (325,829 gallons) Federal Energy Regulatory Commis Limited Liability Corporation Megawatts ATER LEVEL CHANGE V - volume of water released or take	sion en into storage																			

A - area of the aquifer (605,000 acres) S- aquifer storage (assumed to be 0.10) dh - change in water level (inches)

TABLE DR-S&W-207-1 (rev1) PUMPING SCHEDULE FOR CUMULATIVE WATER BUDGET ASSESSMENT PALEN SOLAR POWER PROJECT

	PROPONENT		TECHNOLOCY	SOURCE	1165		WATER USE - RENEWABLE PROJECTS (AFY)								COMMENTS ³	
PROJECT	PROPONENT	BLWI SERIAL ID	TECHNOLOGY	SOURCE	USE	2010	2011	2012	2013	2014	2015	2016	2017	2018-2043		
Chueleuelle Celer I		CA 40000	Distancia (2001/11/1)	Crowndwatar	Construction		20	20	10						Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
Chuckwalla Solar I	Chuckwalla Solar I LLC	CA 48808		Groundwater	Operational			5	7	10	10	10	10	10	Applications, BLM (12-21-09)	
5 - 1 - 1 - 1		CA 40404	Distancia (100MM)	Crowndwatar	Construction			10	10						Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
Eagle Mountain Soleil	enxco	CA 49491		Groundwater	Operational					5	5	5	5	5	Applications, BLM (12-21-09).	
		CA 40402	Dhatavaltaia	Crowndwatar	Construction			20	20	20					Updated from CEC email (12-16) transmitting Table	
Desert Lily Soleil	enxco	CA 49492	Photovoltaic	Groundwater	Operational						5	5	5	5	Applications, BLM (12-21-09)	
Solel Mohave Solar	Desetting	04.40404	Deach all's Taxwah (500MMM)	Orana dana tara	Construction										Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
Park ²	Deset Lily	CA 49494	Parabolic Trough (50010100)	Groundwater	Operational										Applications, BLM (12-21-09). Project Withdrawn.	
Desert Sunlight Solar First Solar CA 48649 Pho	First Solar	CA 48640	Distancia (FEONIM)	Crowndwatar	Construction		9	9	9						Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
		Groundwater	Operational					3.8	3.8	3.8	3.8	3.8	Applications, BLM (12-21-09)			
Eagle Mountain Pump	Eagle Crest Energy	PAD/FERC	Dump Store of (1200MMM)	Crowndwatar	Construction					8,066	8,066	8,066	8,066		Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
Storage	Company, LLC	(January 2009)	Pump - Storage (1300MW)	Groundwater	Operational									1,802	Applications, BLM (12-21-09)	
Conocia Solar Enorgy	Conosia Salar I I C	CA 49990	Porobalia Traugh (250MM)	Croundwator	Construction		813	813	813						Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
Genesis Solar Energy	Genesis Solar LLC	CA 48880	Parabolic Trough (25010100)	Groundwater	Operational					1,644	1,644	1,644	1,644	1,644	Applications, BLM (12-21-09)	
Mule Mountain Solar	Bullfrog Green Energy,	CA 40007	Distancia (500MM)	Crowndwatar	Construction		20	20	20						Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
Project	LLC	CA 49097		Groundwater	Operational			0.25	0.5	0.7	0.7	0.7	0.7	0.7	Applications, BLM (12-21-09)	
Mula Mauntain Calail		CA 40499	Diretovaltaia (2001/11/1)	Crowndwatar	Construction			10	10						Updated from CEC email (12-16) transmitting Table "Cumulative Projests - I-10 Corridor" and First-In-Line Solar	
Mule Mountain Soleli	enxco	CA 49488	Photovoltaic (200ivivv)	Groundwater	Operational					5	5	5	5	5	Applications, BLM (12-21-09)	
Dalars Oalars Davies	Solar Millennium	0.4.4004.0		One standard	Construction		480	480	480						As proposed in the AFC (August 2009)	
Palen Solar Power	LLC/Chevron	CA 48810	Parabolic Trougn (484MW)	Groundwater	Operational					303	303	303	303	303]	

NOTES

There is conflict between the CEC and BLM lists as to whether these projects will be permitted. They have been included for completeness though they may well not be part of the cumulative water budget for the Chuckwalla Valley Groundwater Basin. 1

This project has been withdrawn. The application has been rejected. 2 3

First-In-Line Solar Applications - http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pa/energy/solar.Par.45875.File.dat/Renew_Energy_2_09_solar.pdf

TABLE DR-S&W-207-2 (rev1) RESULTS FROM PREDICTIVE SIMULATIONS NUMERICAL GROUNDWATER MODEL PALEN SOLAR POWER PROJECT CHUCKWALLA VALLEY GROUNDWATER BASIN RIVERSIDE, CALIFORNIA

Model Runs ¹	Zone	e 1 ³	Zone 2 ³		Zone 3 ³		Period of		Change in storage, af ⁴			
	T, ft2/d	S	T, ft2/d	S	T, ft2/d	S	interest	Well 1	Well 2	Well 3	Well 4	
	1,000			0.2	26,000	0.2	2013	11.67	6.49	11.69	6.50	1,440
Run 7		0.2	6,300				2029	9.78	5.97	9.96	6.48	6,288
							2043	10.76	6.75	10.96	7.51	10,530
							2013	11.67	6.49	11.69	6.50	4,109
Run 15 ²	1,000	0.2	6,300	0.2	26,000	0.2	2029	9.80	5.97	10.00	6.48	89,633
							2043	10.93	6.76	11.23	7.54	142,526

Notes

1 Run 7 is the "Project Only" simulation and Run 15 is the "Cumulative Impacts" Assessment

2 Refer to Table DR-S&W-207-1 (rev1) for the water use schedule for the renewable projects identified in the model

3 Figure DR-S&W-207-3 shows the areal distribution of transmissivities used in the model

4 Model input and output files provided in Attachment A

STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of: APPLICATION FOR CERTIFICATION for the PALEN SOLAR POWER PROJECT

Docket No. 09-AFC-7 PROOF OF SERVICE

(Revised 12/28/2009)

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DECLARATION OF SERVICE

I, Carl Lindner, declare that on, March 12, 2010, I served and filed copies of the attached Palen Solar Power Project Data Response materials:

Responses to January 14, 2010 CEC Workshop Queries (Groundwater) Technical Area: Soil & Water Resources

The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[http://www.energy.ca.gov/sitingcases/solar_millennium_palen]

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply) For service to all other parties:

<u>X</u> sent electronically to all email addresses on the Proof of Service list;

by personal delivery or by overnight delivery service or depositing in the United States mail at <u>Camarillo</u>, <u>California</u> with postage or fees thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

X_ sending an original paper copy and one electronic copy, mailed respectively, to the address below (preferred method);

OR

_ depositing in the mail an original and 12 paper copies, along with 13 CDs, as follows:

CALIFORNIA ENERGY COMMISSION Attn: Docket No. 09-AFC-7

1516 Ninth Street, MS-4 Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

and E. Lindner