

**CALENDAR ITEM  
C82**

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PRC 8949.2  
N. Saito

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**CONSIDER APPROVAL FOR A TWO-YEAR EXTENSION OF  
STATE GEOTHERMAL RESOURCES PROSPECTING  
PERMIT PRC 8949.2,  
INYO COUNTY**

**PERMITTEE:**

Deep Rose Development, LLC  
Attn.: Mr. Chuck Harris  
809 Broadway, Suite 3  
Sonoma, CA 95476

**AREA, TYPE LAND AND LOCATION:**

Approximately 640 acres of fee owned State School Lands comprising all of Section 16, Township 21 South, Range 38 East, Mount Diablo Baseline and Meridian, Inyo County (see Exhibit A, attached hereto), approximately 20 miles south of Owens Lake, near the Coso Geothermal Field.

**BACKGROUND:**

On September 1, 2011, the California State Lands Commission (Commission) issued State Geothermal Prospecting Permit PRC 8949.2 to Deep Rose Development, LLC (Deep Rose or Permittee) to allow for prospecting of geothermal resources.

On May 6, 2013, Deep Rose submitted a request for a two-year extension pursuant to Paragraph 1 of Permit PRC 8949.2. If Permit PRC 8949.2 is extended, the Permittee will be required to pay an annual rent of twenty-five dollars (\$25.00) per acre for the third and fourth years. The Permittee has a Conditional Use Permit from the Inyo County Planning Department granting permission to drill up to four geothermal exploration wells. The Permittee also has a right-of-way over adjacent U.S. Bureau of Land Management lands to construct a dirt access road to the State parcel.

During the past two years, Deep Rose has spent in excess of \$4,500,000 in pursuit of this project. Road construction is restricted to the months of May –

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October due to snow and requires blasting in small areas. Deep Rose has indicated that road construction is expected to be finished by September 2013 since seven of the eight miles are completed, and construction of a drill site is anticipated to be completed by November 2013. A Mitigated Negative Declaration (MND) (SCH# 2005121125) was prepared by the Division of Oil, Gas, and Geothermal Resources (DOGGR) and adopted on March 28, 2006, for this project. A Mitigation Monitoring Program (MMP) was adopted by DOGGR and is still in effect. Deep Rose expects to obtain a qualified drilling contractor prior to November 2013, following the completion of the drill pad.

**STATUTORY AND OTHER REFERENCES:**

- A. Paragraph 1 of State Geothermal Resources Prospecting Permit PRC 8949.2.
- B. Public Resources Code section 6891.

**OTHER PERTINENT INFORMATION:**

- 1. The Commission staff has reviewed DOGGR's MND and MMP as specified above.
- 2. This activity involves lands identified as possessing significant environmental values pursuant to Public Resources Code section 6370 et seq., but such activity will not affect those significant lands. Based upon the staff's consultation with the persons nominating such lands and through the CEQA review process, it is the staff's opinion that the project, as proposed, is consistent with its use classification.
- 3. Permit PRC 8949.2 provides that upon discovery of geothermal resources in commercial quantities, the Permittee shall have a preferential right to a geothermal resources lease, subject to approval by the Commission.

**EXHIBITS:**

- A. Location Map
- B. Mitigation Monitoring Program (MMP)

**RECOMMENDED ACTION:**

It is recommended that the Commission:

**CEQA FINDING:**

Find that a Mitigated Negative Declaration, State Clearinghouse No. 2005121125, and a Mitigation Monitoring Program were prepared by DOGGR and adopted on March 28, 2006, for this Project and that the

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Commission has reviewed and considered the information contained therein.

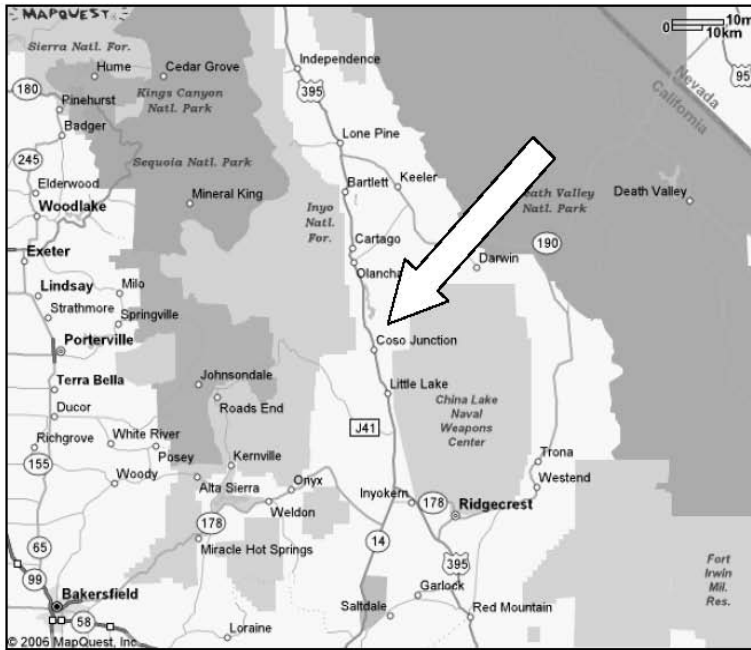
Adopt the Mitigation Monitoring Program, as contained in Exhibit C, attached hereto.

**SIGNIFICANT LANDS INVENTORY FINDING:**

Find that this activity is consistent with the use classification designated by the Commission for the land pursuant to Public Resources Code section 6370 et seq.

**AUTHORIZATION:**

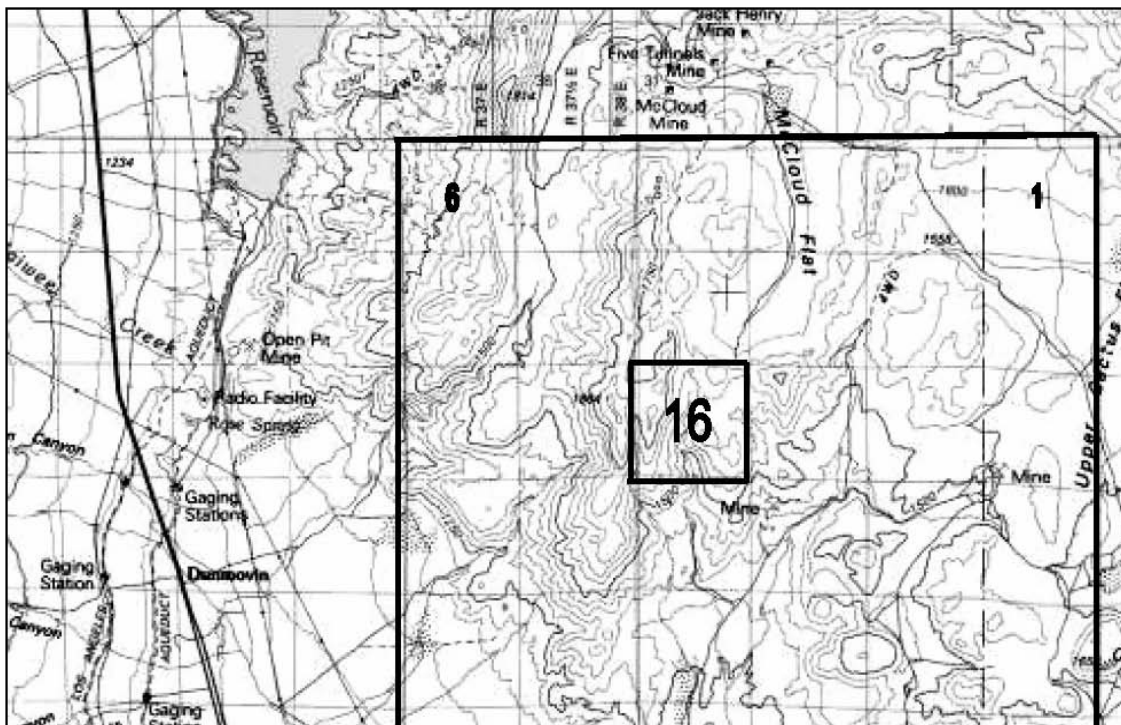
1. Authorize the extension of Geothermal Resources Prospecting Permit PRC 8949.2 through September 1, 2015, with all terms and conditions of the permit to remain in full force and effect. Under such terms of the permit, the rent will be \$25 per acre.
2. Authorize the Executive Officer or her designee to execute any documents necessary to implement the Commission's action.



**EXHIBIT A  
PRC 8949.2**

**LOCATION MAP  
Section 16, T21S, R38E  
INYO COUNTY**

D.D. & J.M.A., 2006



This Exhibit is solely for purposes of generally defining the parcel premises and is not intended to be, nor shall it be construed as, a waiver or limitation of any State interest in the subject or any other property.

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## MITIGATION MONITORING, COMPLIANCE AND REPORTING PROGRAM

### 1.0 Introduction

Section 21081.6 of the Public Resource Code requires all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a mitigated negative declaration or an Environmental Impact Report (EIR). The monitoring or reporting program must ensure implementation of the measures to mitigate or avoid the potential for significant adverse environmental impacts identified in a mitigated negative declaration or EIR. (Tracking CEQA Mitigation Measures Under AB1380, Third Edition, March 1996.)

The following Mitigation Monitoring, Compliance and Reporting Program (MMCRP) has been prepared to meet the California Environmental Quality Act (CEQA) requirements for preparing a MMCRP for the *Draft EA/IS for the Deep Rose Geothermal Exploration Project*. The enforcement responsibilities for each mitigation measure would vary depending upon the agency and issues involved. Enforcement measures may include a written notice of violation, fines levied in exceedances of specified standards, or suspension of activities that may affect endangered species, significant cultural resources or human health and safety.

The Division of Oil Gas and Geothermal Resources (DOGGR) may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as affected jurisdictions and cities, and the California Department of Fish and Game (CDFG). The number of construction monitors assigned to the project will depend on the number of concurrent construction activities and their locations. The California State Lands Commission (SLC) or its designee(s), however, will ensure that each person delegated any duties or responsibilities are qualified to monitor compliance.

Mitigation measures and monitoring are only required for those resource areas for which the potential for significant environmental impacts have been identified within the Draft EA/IS. For the proposed project these resources include: geology/soils, hydrology, biological resources, cultural resources, air quality, noise, and hazardous materials and health & safety, and transportation. For all remaining resources, the proposed project would not result in any associated significant environmental impacts, and therefore do not have any mitigation monitoring requirements.

Table MMCRP-1 summarizes the impacts and mitigation for the Proposed Action. A more detailed discussion of impacts for each resource can be found in the Environmental Consequences section (Chapter 4) of the Deep Rose Geothermal Exploration Project Environmental Assessment/Initial Study/Mitigated Negative Declaration. For the purposes of this MMCRP, each mitigation measure will be referenced as identified in Table MMCRP-1.

#### 1.1 Monitoring Authority

Primary monitoring activities for the proposed project will be the responsibility of Environmental Monitors (EMs) who will coordinate closely with personnel from the DOGGR program office and the BLM Ridgecrest Field Office. Both offices have managed similar projects, and have extensive experience in geothermal drilling and environmental management. The BLM would have the primary responsibility of oversight of the access road and waterline, and DOGGR would have primary responsibility for the well pad site and all exploratory activities on State lands. All documentation generated under this MMCRP will be available for review at either the DOGGR state program office in Sacramento, California or at the BLM Field Office in Ridgecrest, California.

Several EMs will be on-site throughout project construction and drilling, and routine monitoring will be conducted by DOGGR and BLM personnel. This will constitute the fundamental standard of compliance criteria to ensure proper implementation of ALL proposed mitigation measures, as defined in the Draft EA/IS. Observance of noncompliance will be documented by the EM and forwarded to the construction/drilling contractor for immediate corrective action. The DOGGR or BLM will suspend activities if remedial activities do not comply with the mitigation measures.

The proposed project is also under the regulatory management of the Great Basin Air Pollution Control District (GBAPCD) for air quality issues such as hydrogen sulfide, oxides of nitrogen, and fugitive dust management, as well as the Lahontan Regional Water Quality Control Board (LRWQCB) for groundwater and waste discharge management. Regulatory personnel from these agencies are expected to monitor the project and will provide written reports of noncompliance to the DOGGR/BLM.

## **1.2 Enforcement Responsibility**

For those portions of the Proposed Project which occupy California State Lands, The DOGGR is responsible for enforcing the procedures adopted for monitoring through the environmental monitor assigned to each construction spread. Any assigned environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the SLC or its designee.

## **1.3 Mitigation Compliance Responsibility**

The Applicant is responsible for successfully implementing all the mitigation measures in the MMCRP, and is responsible for assuring that these requirements are met by all of its construction contractors and field personnel. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

## **1.4 General Monitoring Procedures**

The DOGGR (on California State Lands) and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the projects daily operations with Deep Rose LLC. In order to oversee the monitoring procedures and to ensure success, the environmental monitor assigned to each construction spread must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

#### **1.5 Summary of Environmental Impacts and Mitigation and Monitoring Measures**

Table MMCRP-1 summarizes the Deep Rose Geothermal Exploration Project's mitigation measures as required in accordance with the project's Mitigated Negative Declaration, as well as the responsible governing agency overseeing the specific mitigation measure.

TABLE MMCRP-1 Deep Rose Geothermal Exploration Project Mitigation, Monitoring, and Reporting Plan  
Summary of Environmental Impacts, Mitigation, and Monitoring Measures for the Proposed Action.

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
Geology and Soils	Impacts to soils from water erosion, wind erosion, and compaction.	GEO-1: Consistent with Best Management Practices (BMPs), adequate drainage control devices and measures will be incorporated into the road and well pad design (e.g., drainage ditches, cross drains, culverts, out-sloping, and energy dissipaters) at sufficient intervals and intensities to adequately control and direct surface runoff above, below, and within the road and well pad environments to avoid erosive concentrated flows. The amount of vegetation cleared will be kept to a minimum to accommodate all necessary project components.	A BLM Field Representative and Environmental Monitor (EM) would be on-site during construction activities to verify and ensure that mitigation measures to control and direct surface runoff are implemented.	BLM and Environmental Monitor
		GEO-2: Water will be applied to disturbed areas and windrowed topsoil during construction to reduce the impacts to soil from wind erosion.	The EM would verify that mitigation is followed.	Environmental Monitor
		GEO-3: Project vehicles would be restricted to designated roads and well pad area. No off-road travel would be permitted.	The EM would verify that mitigation is followed.	Environmental Monitor
		GEO-4: Adequate freeboard in the reserve pit will be maintained to avoid the discharge of geothermal brine and/or drilling fluids to surrounding soils caused by reserve pit overflows.	Random field inspections by DOGGR inspectors during drilling would verify that mitigation is followed.	DOGGR
		GEO-5: Water pipelines would be inspected daily to eliminate the potential for	The EM would verify that mitigation is followed.	Environmental Monitor



RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
<p><b>Geology and Soils</b></p> <p>Increased potential for the occurrence of indirect effects to soils and difficulties with the success of reclamation.</p>		<p>soil erosion damage caused by leaking or broken pipes.</p> <p><b>GEO-6:</b> To reduce the risk of soil erosion due to blowouts, routine testing would be conducted on a BOPE in accordance with DOGGR requirements.</p>	<p>Random field inspections by DOGGR inspectors during drilling would verify that mitigation is followed.</p>	<p>DOGGR</p>
		<p><b>GEO-7:</b> Up to 4 inches (10 cm) of topsoil would be selectively stripped and salvaged from all newly disturbed areas. Topsoil would be stockpiled in several areas at the Deep Rose project site and retained for replacement and revegetation at the time of final reclamation. To reduce erosion and sedimentation during the life of the project, soil stockpiles will be temporarily revegetated with noxious weed-free mixed cover vegetation with an emphasis on native species that possess the ability to root quickly.</p>	<p>A BLM Field Representative and Environmental Monitor (EM) would be on-site during construction activities to verify and ensure that mitigation measures to ensure adequate salvage of topsoil are implemented.</p>	<p>BLM and Environmental Monitor</p>
		<p><b>GEO-8:</b> If the resource is proved to be unsuccessful, topography will be restored to near pre-existing contours at the well pad and all upgraded access roads will be reclaimed to their original width of approximately six feet (1.8 m). These areas would ripped to reduce compaction, covered with topsoil, and seeded with BLM approved seed mixtures as described in <i>Appendix B - Reclamation Plan for the Deep Rose Geothermal</i></p>	<p>A BLM Field Representative and Environmental Monitor (EM) would be on-site during reclamation to ensure the success of initial reclamation activities.</p>	<p>BLM and Environmental Monitor</p>

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
<p style="text-align: center;"><b>Water Resources</b></p>	<p>Potential impacts water resources from reserve pit overflow or percolation.</p>	<p><i>Exploration Project.</i> HYD-1: The reserve pit would be constructed so that a minimum of one-half of the total depth is below the original ground surface on the lowest point within the pit. To prevent seepage of fluids, the reserve pit will be constructed by mechanical compaction or lined with an impermeable polyethylene liner. If utilized, liners would be of sufficient strength and thickness to withstand normal installation and use.</p>	<p>A field inspection by a DOGGR inspector during construction of the well pad and associated facilities would verify and insure proper construction of the reserve pit.</p>	<p>DOGGR</p>
	<p>Limited impacts to surface waters.</p>	<p>HYD-2: Deep Rose will develop and implement a Storm Water Pollution Control Plan (SWPCP) for project related storm water runoff as required by the LRWQCB storm water National Pollution Discharge Elimination System (NPDES) permit requirements for "Discharges to Land with a Low Threat to Water Quality" and State Water Resources Control Board Order No. 99-08 DWQ for storm water runoff associated with construction activity. All conditions and stipulations of the permits issued by LRWQCB will be incorporated as standard operating procedures for the proposed project.</p>	<p>The LRWQCB will verify that Deep Rose has submitted a SWPCP to the Board prior to commencement of construction activities and has been issued a NPDES permit for "Discharges to Land with a Low Threat to Water Quality" and State Water Resources Control Board Order No. 99-08.</p>	<p>LRWQCB</p>
	<p>Hazard of potential release of liquid petroleum products to</p>	<p>HYD-3: Deep Rose will implement a Spill Prevention, Control, and Countermeasures (SPCC) Plan</p>	<p>The LRWQCB will verify that Deep Rose has prepared and submitted a</p>	<p>LRWQCB</p>

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
Biological Resources	persons and the environment.	In accordance with 40 CFR Part 112, dated December 1973 with respect to petroleum hydrocarbon handling and spill prevention and will submit the plan to the LRWQCB prior to the commencement of construction.	SPCC plan prior to commencement of construction activities.	
	Impacts to natural vegetation communities.	<b>BIO-1:</b> All areas to be disturbed will have boundaries flagged prior to construction and all disturbances will be confined to the flagged areas. All employees will be instructed that their activities must be confined to locations within the flagged areas. Deep rose will have environmental monitors on-site during construction activities.	The EM would verify that mitigation is followed.	Environmental Monitor
	Increased potential for the limited invasion and establishment of noxious weed species.	<b>BIO-2:</b> All construction equipment will be power washed prior to its arrival at the project site to prevent the transportation and establishment of noxious weeds in the project area.	The EM would verify that mitigation is followed.	Environmental Monitor
	Impacts to natural vegetation communities.	<b>BIO-3:</b> During reclamation, all disturbed areas will be appropriately topsoiled and seeded with a BLM/DOGGR approved seed mix per the specifications outlined in <b>Appendix B - Reclamation Plan for the Deep Rose Geothermal Exploration Project.</b>	A BLM Field Representative and EM would be on-site during reclamation activities to verify and insure that all disturbed areas are appropriately topsoiled and seeded.	BLM and Environmental Monitor
Increase in the potential for illegal kill and harassment of wildlife.	<b>BIO-4:</b> To avoid the potential for mortality and harassment of wildlife, all firearms and dogs will be prohibited from the project site and all workers		The EM would verify that mitigation is followed.	Environmental Monitor

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
Biological Resources	Potential to foster an un-natural increase in opportunistic predators in the project area.	<p>will be required to check under their vehicles prior to departing the project site.</p> <p><b>BIO-5:</b> Trash and food items will be disposed of promptly in puncture-proof containers with resealable lids. Trash containers will be removed regularly (at least once per week). This effort will reduce the attractiveness of the area to opportunistic predators such as coyotes, kit foxes, and common ravens.</p>	The EM would verify that mitigation is followed.	Environmental Monitor
	Potential for direct mortality to wildlife.	<b>BIO-6:</b> A maximum speed limit of 25 miles per hour, unless otherwise posted, will be maintained while traveling on unimproved access roads on the project site. This effort will reduce the potential for vehicle-wildlife related collisions.	The EM would verify that mitigation is followed.	Environmental Monitor
	Potential for direct and indirect displacement of some wildlife species and wild horses in particular.	<b>BIO-7:</b> Prior to the onset of construction, Deep Rose and the BLM will examine the potential for the development of one or more guzzlers in the project area as a source of water for wildlife (and in particular, wild horses). Water for the implementation of this effort would come from either the water line or water storage trucks.	A BLM Field Representative would be on-site prior to the start of construction to locate potential areas that would be suitable for guzzler development.	BLM
	Direct and indirect impacts to the Mojave ground squirrel.	<b>BIO-8:</b> Under the proposed CDFG Section 2081 permit, the Project Applicant will acquire compensatory lands at a 3:1 ratio within twelve months of surface disturbance at the proposed.	Prior to any ground disturbing activities, CDFG will issue an Incidental Take Permit for the project and coordinate	CDFG

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
Biological Resources	Overall impacts to biological resources.	<p>Project site. The Project Applicant will acquire a maximum 40 acres (16 ha) of offsite lands suitable for Mojave ground squirrel, and will provide funding to CDFG for implementation and enhancement activities for habitat acquired, and to perform long-term management of the acquired habitat in perpetuity for the Mojave ground squirrel. The location and conservation management of the identified compensatory lands shall be approved by the California Department of Fish and Game (CDFG) pursuant to Section 2081 of the California Fish and Game Code.</p> <p><b>BIO-9:</b> A brief Worker Environmental Awareness Program (WEAP) will be implemented for construction and drilling crews prior to the commencement of project activities. Training materials and briefings will include but not be limited to, discussion of the Federal and State ESAs, the consequences of noncompliance with these acts, identification and values of wildlife and natural plant communities, hazardous substance spill prevention and containment measures, and review of all required and recommended mitigation measures.</p>	<p>with Deep Rose on the acquisition of an appropriate amount of off-site compensation lands for the Mojave ground squirrel.</p> <p>The EM would verify that mitigation is followed.</p>	Environmental Monitor
Cultural Resources	Impacts to potentially significant	<p><b>CUL-1:</b> If the evaluation program determines that one or more of the</p>	BLM will verify Deep Rose's compliance with	BLM

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
<p><b>Cultural Resources</b></p>	<p>archaeological resources</p>	<p>sites are eligible for inclusion in the National Register, a treatment plan will be developed by Deep Rose and BLM and/or the California State Lands Commission (SLC) (depending on the site's location) in consultation with the State Historic Preservation Office (SHPO), and will be implemented prior to the start of construction.</p>	<p>development and implementation of an approved treatment plan for cultural resources.</p>	
	<p>Impacts to potentially significant archaeological resources</p>	<p><b>CUL-2:</b> If archaeological resources were discovered during construction of the well pad or road, all work in the immediate vicinity would be suspended pending site investigation by a DOGGR/BLM approved archaeologist to assess the materials and determine their significance. If the archaeologist determines that the resource is potentially significant, construction in the immediate area would not resume until the BLM Authorized Officer (AO) and SHPO have been consulted and the resources appropriately evaluated and treated in accordance with mitigation measure CUL-1.</p>	<p>BLM and DOGGR would verify that mitigation is followed.</p>	<p>Environmental Monitor, DOGGR, and BLM</p>
		<p><b>CUL-3:</b> In the unlikely event that personnel discover human remains, all work in the vicinity of the discovery would be stopped and the BLM AO notified immediately. The BLM AO would then notify the Inyo County Coroner, the SHPO and local Native American tribal representatives.</p>	<p>BLM would verify that mitigation is followed</p>	<p>BLM</p>

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
<p><b>Cultural Resources</b></p> <p>Impacts to potentially significant archaeological resources</p>		<p>Work at the site would not resume until consultations and appropriate disposition of the human remains has concluded.</p> <p><b>CUL-4:</b> Avoidance of documented cultural resource sites in the project area will be ensured by the placement of a 60-foot buffer zone between the site boundary and the construction area, and monitoring of all construction activity by a qualified archaeologist. Prior to any surface-disturbing activities, site boundaries and buffer zones will be clearly marked and this information indicated on construction drawings, which will be reviewed for accuracy by an archaeologist familiar with the resources in the area.</p>	<p>The EM would verify that mitigation is followed.</p>	<p>Environmental Monitor</p>
		<p><b>CUL-5:</b> If previously unrecorded cultural resources are encountered during grading or other surface-disturbing activities, all ground disturbing activities at the location of the discovery would cease, and BLM and DOGGR notified. Grading or other surface-disturbance activities would not recommence at the location of the discovery until all the identified cultural resource(s) have been assessed, any necessary mitigation actions taken, and approved by the BLM AO and DOGGR.</p> <p><b>CUL-6:</b> All project employees, contractors</p>	<p>BLM and DOGGR would verify that mitigation is followed.</p>	<p>Environmental Monitor, DOGGR, and BLM</p>
			<p>The EM would verify that</p>	<p>Environmental</p>

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
		and vendors would be required to sign an acknowledgement that they have been apprised of the regulations prohibiting the illegal collection of artifacts or disturbance of archaeological sites, and of the mitigation measures contained herein. Deep Rose will retain copies of these signed acknowledgments until completion of the project.	mitigation is followed.	Monitor
Air Quality		<b>AIR-1:</b> The amount of project related fugitive dust would be minimized by watering all unpaved roadway surfaces consistent with GBUA/PCD Rule 401, and limiting vehicle speeds on unpaved roads to 25 mph.	The EM would verify that mitigation is followed.	Environmental Monitor
	Impacts from fugitive dust	<b>AIR-2:</b> Well pad and sump construction would be accomplished in as short a time as possible in order to reduce fugitive dust created by construction. If traffic-induced dust becomes a problem, road watering would be increased and/or workers would be required to further coordinate trips and carpools.	The EM would verify that mitigation is followed.	Environmental Monitor
	Impacts from NOx emissions	<b>AIR-3:</b> If exhaust emissions of oxides of nitrogen from the drilling rig exceeds 250 lbs/day (GBUA/PCD Rule 209A), the drilling contractor would be required to use BACT control measures, which may include one or more of the following options: <ul style="list-style-type: none"> <li>Retard timing by 4 degrees of standard</li> </ul>	Verify with the GBUA/PCD that BACT control measures have been implemented to reduce exhaust emissions from the drill rig.	GBUA/PCD



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Air Quality		<ul style="list-style-type: none"> <li>Meet applicable EPA/CARB <i>Off Road Compression Ignition Engine Air Pollutant Emission Standards</i>.</li> <li>BACT selective catalytic reduction devices, or</li> <li>Other BACT control measures as proposed by the drilling contractor and acceptable to GBUAFCD.</li> </ul>		
	Impacts from H <sub>2</sub> S	<p><b>AIR-4:</b> The contractor will be allowed to discharge into the atmosphere from any geothermal well, including well drilling, well reworking, and well testing, no more than 2.5 kg/hr of H<sub>2</sub>S. If the emission of H<sub>2</sub>S exceeds 2.5 kg/hr, or if the State's H<sub>2</sub>S ambient air quality standard for one hour is exceeded at a monitoring station located at a GBUAFCD approved site, further venting of the well(s) containing H<sub>2</sub>S will be curtailed until an H<sub>2</sub>S abatement plan, approved by the GBUAFCD, is implemented to reduce H<sub>2</sub>S well emissions below 2.5 kg/hr and ambient concentrations below the State standard of 0.03 parts per million.</p> <p>No Additional Mitigation Measures are Recommended</p> <p><b>NOI-1:</b> Well flow testing would be through a well field silencer.</p>	<p>The GBUAFCD will verify that Deep Rose and/or the drilling contractor has submitted an H<sub>2</sub>S abatement plan to the Board prior to the commencement of drilling activities.</p>	GBUAFCD
Visual Resources	None			
Noise	Increases in noise associated with well drilling, testing, and		A field inspection by an Inyo County representative during well	Inyo County

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY	
	monitoring.		flow testing would verify the use of a well field silencer.		
Noise		<p><b>NOI-2:</b> Workers would be provided with proper ear protection and be required to use it during construction, drilling, and well testing activities.</p> <p><b>NOI-3:</b> All equipment will be equipped with manufacturer's standard noise control devices (i.e. mufflers, acoustical lagging, and/or engine enclosures), which will normally achieve compliance with the recommended noise limits in most areas.</p> <p><b>NOI-4:</b> If blasting becomes necessary, efforts will be made to restrict the peak overpressures to less than 120 dB at the source to minimize effects to surrounding areas.</p>	<p>Periodic field inspections by OSHA representatives would insure compliance with all project related safety measures.</p> <p>A field inspection by an Inyo County representative would verify compliance with recommended noise limits.</p>	CAL/OSHA	
	Increases in noise associated with well drilling, testing, and monitoring.			Inyo County	
				The EM would verify that mitigation is followed.	Environmental Monitor
Recreation	None	No Additional Mitigation Measures are Recommended			
Hazardous Materials and Health & Safety	Potential hazard to persons from the improper handling and use of hazardous substances	<b>HAZ-1:</b> The contractor would provide the required and necessary safety equipment and personal protective equipment to minimize worker exposure.	Periodic field inspections by OSHA representatives would insure compliance with all project related safety measures.	CAL/OSHA	
		<b>HAZ-2:</b> During construction and upon commencement of drilling operations, the contractor will have chemical or hazardous substance inventory for all such items that may be at the site. The contractor will institute a Hazard Communication	Periodic field inspections by OSHA representatives would insure compliance with all project related safety measures.	CAL/OSHA	

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<p><b>Hazardous Materials and Health &amp; Safety</b></p>	<p>Potential hazard to persons from the improper handling and use of hazardous substances</p>	<p>Program (HCP) for their employees and will require subcontractor programs in accordance with OSHA 29 CFR 1910.1200. These programs are designed to educate and protect the employees and subcontractors with respect to any chemicals or hazardous substances that may be present in the work place. It will be required that as every chemical or hazardous material is brought on location, a Material Safety Data Sheet (MSDS) will accompany that material and will become part of the file kept at the field office as required by 29 CFR 1910.1200. All employees will receive the proper training in storage, handling, and disposal of hazardous substances.</p> <p><b>HAZ-3:</b> Deep Rose will develop and implement a Spill Prevention, Control, and Countermeasures (SPCC) plan in accordance with 40 CFR Part 112, dated December 1973 with respect to petroleum hydrocarbon handling and spill prevention and will submit the plan to the LRWQCB prior to the commencement of construction.</p> <p><b>HAZ-4:</b> Hydrogen sulfide (H<sub>2</sub>S) monitors and emergency escape equipment would be available at the drilling rig during drilling and well testing operations. Workers would be</p>	<p>The LRWQCB will verify that Deep Rose has submitted a SPOC plan prior to commencement of construction activities.</p> <p>Periodic field inspections by OSHA representatives would insure compliance with all project related safety measures.</p>	<p>LRWQCB</p> <p>CAL/OSHA</p>

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
		Instructed in the correct usage of this equipment.		
		<b>HAZ-5:</b> All project activities would be conducted in accordance with all applicable CAL/OSHA regulations.		Inyo County
	A potential impact on localized traffic slow-downs or congestion along U.S. 395 and Coso/Gill Station Road.	<b>TRA-1:</b> Coordinate project construction planning schedules to avoid other possible permitted uses or to reduce the potential for localized traffic slow-downs or congestion.	The Inyo County of Public Works Department and/or Caltrans would ensure that there are no project related conflicts to existing traffic levels.	Inyo County
<b>Transportation</b>	Increased potential for hazards to motorists due to a localized increase in traffic.	<b>TRA-2:</b> Proper road signs would be prominently placed near the intersection of U.S. 395 and Coso/Gill Station Road and the intersection of Coso/Gill Station and Pumice Mine roads or other locations to encourage motorists to exercise caution when approaching these areas. In the event that signing does not meet safety standards, appropriate modifications to intersections would be considered in order to improve site visibility.	The Inyo County of Public Works Department representative would meet with Deep Rose to determine locations for road sign(s).	Inyo County
<b>Land Use and Socio-economics</b>	None	No Additional Mitigation Measures are Recommended		