BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 6.18.12 through 6.24.12

Summary:

The BLM is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement (FEIS) for the Ocotillo Wind Energy Facility Project. The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP status report is intended to provide a description of construction activities on the project, a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECM's), the compliance status of mitigation measures required by the ECCMP, and anticipated construction activities for the following week. This weekly report covers construction activities for the period of 6.18.12 through 6.24.12.

Site Inspections/Mitigation Monitoring:

Issues/Concerns with Applicable Conditions of Certification

Speed Limit along Access Roads: In accordance with Mitigation Measure Air-1, speed limits along all access roads shall not exceed 15 miles per hour. An ECM observed construction vehicle traffic along the access road between the Temporary Laydown Yard and Substation/Switchyard exceeding the speed limit on 6.18.12. The construction contractor was notified of the observation and the vehicle operators were immediately notified of the speed limit restrictions. Following the notification being provided to the operators, no issues or concerns were observed regarding vehicle speed limits being maintained along project access roads.

Armor Balls Movement in High Winds: An ECM observed portions of the water surface at the temporary water storage pond being exposed during high wind events. The ability for the armor balls to be effective in high wind events was communicated to the construction

contractor on 6.11.12 through 6.19.12. The construction contractor remedied the issue/concern by placing slats along the southwest portion of the exclusionary fence, which will reduce the wind strength from disturbing the armor balls. The issue/concern associated with movement of the armor balls in high winds was resolved on 6.20.12 when the material was put in place to reduce the strength of the wind.

Track-out: An ECM observed track-out along County Road S2 located immediately adjacent to the main point of ingress/egress to the project site on 6.19.12. The observation was communicated to the lead environmental monitor at 7:30 AM and crews were observed sweeping the trac-out along County Road S2 at 2:00 PM.

Maintenance of Temporary Pond Fencing: An ECM observed issues/concerns with the fencing being maintained along the temporary pond to prevent wildlife from entering into the temporary pond area. The issue/concern was reported to the lead environmental monitor with OE LLC on 6.24.12. Follow-up will be completed on 6.25.12 to ensure fencing is being maintained to limit the potential for wildlife entering into the temporary pond area.

Dust Emissions: An ECM on 6.19.12 observed dust emissions along an inactive access road to WT 147 that were intermittent for a duration of approximately 10 to 20 seconds with the varying wind speed and direction. The dust emissions were reported to the Imperial County Air Pollution Control District (APCD) by members of the general public. A Notice of Violation was issued to the construction contractor by the APCD for fugitive dust emission violations. Corrective actions completed by the construction contractor included applying water and an Envirotac Rhino Snot to suppress dust emissions.

Issues of Concern with or by the Applicant

None.

Construction Activities:

The construction activities conducted for this period consisted of clearing and grading access roads for wind turbines, establishing the 12-acre temporary laydown yard, above-grade installation of substation/switchyard components at the 30-acre substation/switchyard, surveying and staking turbine access roads and geotechnical testing.

Wind Turbine Access Roads and Pad Sites: Crews were observed clearing and grading within the approved work limits for the access roads between WT-173-174 and 131-176.

12-acre Temporary Laydown Yard: Crews were observed establishing the temporary laydown yard including the placement of construction trailers within the approved limits. The temporary laydown yard is being utilized to park personal construction vehicles, stage construction equipment and materials and to stage construction contractor trailer offices.

30-acre Substation/Switchyard: Construction activities during this reporting period consisted of staging construction equipment and initiating work efforts to erect above-grade components associated with the 30-acre substation/switchyard.

Surveying and Staking Turbine Access Roads: Survey crews were onsite throughout the week to place survey stakes for anticipated grading activities associated with the turbine access roads. The survey stakes are being utilized to delineate the approved work limits for anticipated grading activities.

Geotechnical Testing: Crews utilized approved access routes to complete geotechnical testing at turbine pad sites located throughout the project site.

Compliance:

Environmental compliance monitors conducted site inspections of the active construction areas on a daily basis from 6.18.12 through 6.24.12. Areas of active construction were observed to verify implementation of the measures stipulated in the project's ECCMP as they pertain to current construction activities. Daily observations were documented on daily site inspection forms and applicable mitigation measures were reviewed.

Pre-construction mitigation measures have been completed as indicated in NTP #1. The Project Applicant has contracted with a biological and archeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP.

In accordance with Mitigation Measure Air-1, speed limits along all access roads shall not exceed 15 miles per hour. An ECM observed construction vehicle traffic along the access road between the Temporary Laydown Yard and Substation/Switchyard exceeding the speed limit on 6.18.12. The construction contractor was notified of the observation and the vehicle operators were immediately notified of the speed limit restrictions. Following the notification being provided to the operators, no issues or concerns were observed regarding vehicle speed limits being maintained along project access roads.

An ECM observed portions of the water surface at the temporary water storage pond being exposed during high wind events. The ability for the armor balls to be effective in high wind events was communicated to the construction contractor on 6.11.12 through 6.19.12. The construction contractor remedied the issue/concern by placing slats along the southwest portion of the exclusionary fence, which will reduce the wind strength from disturbing the armor balls. The issue/concern associated with movement of the armor balls in high winds was resolved on 6.20.12 when the material was put in place to reduce the strength of the wind (see photo 1).

An ECM observed track-out along County Road S2 located immediately adjacent to the main point of ingress/egress to the project site on 6.19.12. The observation was communicated to

the lead environmental monitor at 7:30 AM and crews were observed sweeping the trac-out along County Road S2 at 2:00 PM (see photo 2).

An ECM observed issues/concerns with the fencing being maintained along the temporary pond to prevent wildlife from entering into the temporary pond area. The issue/concern was reported to the lead environmental monitor with OE LLC on 6.24.12. Follow-up will be completed on 6.25.12 to ensure fencing is being maintained to limit the potential for wildlife entering into the temporary pond area.

An ECM on 6.19.12 observed dust emissions along an inactive access to WT 147 that were intermittent for a duration of approximately 10 to 20 seconds with the varying wind speed and direction. The dust emissions were reported to the Imperial County Air Pollution Control District (APCD) by members of the general public. A Notice of Violation was issued to the construction contractor by the APCD for fugitive dust emission violations. Corrective actions completed by the construction contractor included applying water and an Envirotac Rhino Snot application to suppress dust emissions. With the exception of the instance noted above, the construction contractor has been observed actively watering down construction areas during ground disturbance activities in accordance with MM-AIR-1 (see photos 3 and 4).

Spill clean-up kits are being maintained and utilized by construction crews in accordance with the SWPPP (MM-Water-1). Drip-pans are being placed beneath construction equipment being stored onsite overnight to ensure equipment does not leak directly onto the ground surface (see photo 5).

Stabilized construction entrances are being established and maintained at locations where project access roads intersect paved access roads (see photo 6). The stabilized construction entrances consist of rock aprons and rattle plates to minimize trac-out from construction equipment along paved access roads.

Construction activities occurring at the 30-acre substation/switchyard were observed being completed within the approved work limits (see photo 7). Dust emissions were being monitored on a regular basis and no issues/concerns were reported throughout the week.

Geotechnical testing activities were observed throughout the week being completed within the approved work limits and both an archeological and biological monitor approved by the BLM were present during the geotechnical testing activities (see photo 8). The biological and archeological monitors were observed guiding the geotechnical rigs to the testing locations along approved access roads and observing for archeological and biological resources to minimize disturbances to resources that may be present.

Based on environmental compliance monitors observations, all crew members working on the project site have been WEAP trained and sensitive environmental resources requiring avoidance within proximity to the active construction areas are being identified in accordance with the project requirements.

Construction Schedule:

Scheduled Activities for Next Week: The anticipated construction activities associated with week ending 7.01.12 consist of the following:

- Laydown Yard
  - Install temporary security fencing along the limits of Laydown Yard
  - Install septic system for temporary construction trailers
- Wind Turbines (WT)
  - Build subgrade at WT-11, 50 and 67.
  - Gravel roads at WT-11, 67, 150, 175 and 176.
  - Prepare WT pad sites at WT- 9, 10, 11, 50, 64, 65, 66, 67, 94, 95, 96 and 97.
- Substation and Switchyard
  - Erect substation and switchyard components associated with Phase 2.
  - Construct berm along the perimeter of the substation/switchyard.
- Geotechnical Activities
  - Geotechnical testing at WT pad sites as determined throughout the week.

Potential Delays to the Online Date of the Project

- None identified at this time.

Plan Review Submittal Items

Submittal Type	Description
N/A	N/A

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	5.14.12	Clearing and grading of the following facilities: • 12-acre temporary laydown yard • 30-acre Substation/Switchyard • Temporary and permanent access road/collection corridors and permanent turbine area for 71 turbines. • Performance of all required geotechnical studies within the Project site with access along planned access road corridors. • Buried Site Sensitivity Testing • Structure installation at the SDG&E Energy switchyard.	Yes
2	Pending	Clearing and grading of the following facilities. • 112 turbines. • 2 MET towers • 3.4-acre O&M facility • 10-acre temporary laydown area • Temporary connex storage areas • Temporary crane walk corridors Excavation and installation for all project infrastructure including foundations, collection system, electrical utility, and communication systems. Structural erection for all approved project features including concrete foundations, structural steel, wind turbine towers, MET towers, and the wind farm substation. Electrical wiring, testing, and pre-commissioning of wind turbines, MET towers, collection electrical system and wind farm substation. Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at substation and switchyard. Structure installation at the SDG&E energy switchyard.	TBD

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	5.23.12	Shift of the 30-acre substation/switchyard approximately 565 feet to the north in order to minimize disturbance to areas that have the potential of cultural importance.	Approved	6.4.12
2	5.31.12	Conduct geotechnical investigations at 12 turbines sites that are within 500 feet of the Palm Springs formation.	Approved	6.12.12
3	6.4.12	Temporary use of the BLM's Western Colorado Desert Routes of Travel (WECO) in order to complete pre-construction surveys as identified in the Final EIR/EIS and Record of Decision (ROD).	Approved	6.12.12
4	6.4.12	Temporary use of BLM WECO routes outside those designated as approved project roads in the ROD for geotechnical rigs to access turbine locations to conduct the required further geotechnical investigations.	Approved	6.20.12
5	6.8.12	Turbine micro-siting and road re-alignments to minimize potential disturbance to environmentally sensitive resources.	Pending	Pending
6	6.13.12	Additional temporary work space for construction and permanent access to the transmission line turning structures at the substation/switchyard.	Pending	Pending

Photographs from Week

	
Photo 1: Fencing slats are placed along the southwestern limits of the temporary water pond to reduce the wind effects of potential armor ball movement within the temporary water pond.	**Photo 2:** A mechanical sweeper is utilized to clean trac-out along paved roadways that intersect with access roads for wind turbines.
	
Photo 3: A water truck is utilized for dust suppression and compaction purposes associated with establishing the foundation for a wind turbine pad site.	**Photo 4:** A water truck is utilized during grading activities associated with establishing the access road between WT 131 and WT 176.

	
Photo 5: Crews place containment bins beneath construction equipment while not in use to prevent leaking equipment from leaking directly onto exposed soils.	**Photo 6:** A crew constructs a stabilized construction entrance at wind turbine string 152 through 175.
	
Photo 7: Crews initiated Phase II of the substation/switchyard construction by mobilizing construction equipment to the graded pad site.	**Photo 8:** A drill rig completing geotechnical activities within the approved work limits.