



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 9.17.12 through 9.23.12

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 reporting period of 9.17.12 through 9.23.12.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by BLM ECM's during daily site observations. These following issues/concerns are being monitored to ensure follow-up is completed in a reasonable amount of time to avoid potential impacts to sensitive environmental resources per the intent of the ECCMP.

Issues/Concerns with Applicable Conditions of Certification

Dust Suppression: On 9.17.12 and 9.21.12, ECM's observed dust emissions along Dos Cabezas Road and along access roads to wind turbine pad sites. The dust observations were reported to the construction contractor and the applicant's lead environmental monitor at the time of the observation. Upon notification being provided to the construction contractor and the applicant's lead environmental monitor, water trucks were mobilized within approximately 45 minutes to water down access roads in order to minimize dust emissions from vehicles travelling along unpaved access roads.

On 9.23.12 the Imperial County Air Pollution Control District (APCD) issued a notice of violation (NOV) related to dust emissions generated by a water haul tanker delivering water to the temporary water pond at the laydown yard. The dust emissions being generated from the

water haul tanker exceeded the 20% opacity as specified in Rule 805. Subsequent to the NOV being issued by APCD, the construction contractor has equipped water haul tankers with a water spray bar to provide dust control during hauling activities.

Night Work: ECM's observed construction crews completing night work activity within 3,000 feet of the Anza Borrego State Park on the evenings of 9.19.12 and 9.20.12. The construction contractor along with all subcontractors were notified that construction activities shall be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, 9:00 a.m. to 5:00 p.m. on Saturday, and no construction activities are permitted on Sunday or holidays when construction is occurring within 3,000 feet of residential or recreational areas. The construction contractor and all subcontractors acknowledged that they are fully aware of the requirements for night construction activities.

Work Limits: On 9.19.12 an ECM observed tire tracks from a gravel truck that became stuck approximately one to two feet beyond the approved work area at a wind turbine pad site. The disturbance consisted of an area that measured approximately 1 meter by 1 meter to previously undisturbed vegetation. The applicant's lead biological monitor was notified and no damage to sensitive environmental resources occurred. No corrective actions were required as the work limits were clearly delineated and the operator went beyond the approved work limits in error.

Construction Activities

Construction activities conducted for this period consisted of establishing the pad sites for wind turbines, construction of wind turbine foundations, erecting wind turbine components, trenching the collection line corridors, constructing the structural steel, masonry block, metal deck, roof, interior walls, and electrical conduit at the O&M Building, constructing rebar for the turning structures for the Sunrise Powerlink energy tie-in, and pouring concrete foundations, erecting structural steel, and installing grounding at the 30-acre Substation/Switchyard. Four turbines were erected during the reporting period. To date approximately 79 wind turbine foundations have been excavated, 65 wind turbine foundations concrete pours have been completed, 26 rotors have been assembled, and 20 rotors have been erected.

Compliance

Environmental compliance monitors conducted site inspections of the active construction areas on a daily basis. 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 including but not limited to development and implementation of pre-construction plans have been completed as indicated in NTP #1 and NTP #2.

OE LLC has contracted with an archeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. Archeological monitors were observed completing ongoing monitoring in accordance with the project requirements and establishing ESA's prior to initiating ground disturbance. ECM's were onsite during all ground disturbance activities to ensure lead archeological monitors were present completing monitoring in accordance with the project requirements.

Water wagons and water trucks were routinely observed watering down areas of active grading, trenching, and excavation to ensure dust emissions were minimized during construction activities in accordance with the dust control plan (see photo 1). In addition a soil binding agent is being utilized along access roads and stockpiles to minimize dust emissions in areas that have been disturbed as a result of construction activities.

In accordance with the Paleontological Monitoring and Treatment Plan (MM-Paleo-1), a paleontological monitor permitted by BLM is to be present when excavation activities occur within sensitive fossil bearing formations. ECM's observed a paleontological monitor completing monitoring duties as defined in the Paleontological Monitoring and Treatment Plan when crews were excavating foundations within sensitive fossil bearing formations (see photo 2).

ECM's reported observations throughout the reporting period to ensure good housekeeping practices were being implemented on a day-to-day basis in accordance with MM-Water-9 and the SWPPP. Observations reported by ECM's included properly labeling hazardous materials stored onsite, cleaning-up soil stains, and managing concrete waste debris. The ECM's observations were reported to OE LLC and the lead biological monitoring team and these issue/concerns were addressed in a timely manner.

In accordance with the Construction Fire Safety Plan (MM-Fire-1) a fire extinguisher shall be available during all "hot" construction activity. On 9.19.12 an ECM observed construction workers using an acetylene torch with no fire extinguisher onsite. Upon notification being provided to the construction contractor, a fire extinguisher was placed adjacent to the construction activity per the requirements of the Construction Fire Safety Plan.

Construction activities occurring during this reporting period consisted of nighttime work in accordance with the activities disclosed in the Plan of Development and EIS. ECM's are onsite during all nighttime work to ensure the lighting being set-up on a daily basis meets the requirements established in MM-VR-2. ECM's are onsite to work with crews on setting up lights at each construction activity area. An ECM observed lighting on 9.17.11 and 9.19.12 that did not meet the intent of MM-VR-2 as the lighting was not fully directed downwards per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor, the lighting was redirected downwards in accordance with the criteria established in MM-VR-2 (see photo 3). On 9.17.12 and 9.19.12 an ECM observed lighting that was left on in excess of thirty minutes at an unoccupied turbine pad. In each case, the ECM notified the construction contractor and the lighting was immediately turned off.

In accordance with MM-Wild-1d, the boundaries of all areas to be disturbed are delineated with stakes and flagging prior to construction activities. ECM's observed OE LLC working with land surveyors and the biological monitor to ensure all work areas are clearly delineated prior to ground disturbance. The limits of work are monitored by a biological monitor during all ground disturbance activities to ensure construction activities remain within the approved work limits and that the work limits are properly delineated. All work areas were observed to be properly delineated during this reporting period.

In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash onsite must be kept in covered trash receptacles. On 9.17.12 an ECM observed an uncovered trash bin at

the 30-acre Substation/Switchyard. ECM's and the lead biological monitors completed routine site observations to make sure trash receptacles are being covered. With the exception of the instances noted above, trash receptacles were observed being covered along the ROW. Covers consist of tarps and plastic lids that are secured to the trash bins. "Keep Covered" signage has also been affixed to all trash receptacles to remind construction crews to securely cover trash receptacles at all times (see photo 4).

The lead biological monitor was observed conducting regular vehicle inspections at the Laydown Yard to ensure that all vehicles have been washed prior to entering the project site in accordance with the Integrated Weed Management Plan (IWMP) MM-Veg-1d. In the event a vehicle had not been washed a "wash ticket" is issued and the operator of the equipment is required to washout the wheel wells and tires at the wash station located at the laydown yard (see photo 5).

Construction crews were observed throughout the reporting period completing turbine base concrete pours (see photo 6). Sixty five wind turbine base pours have been completed to date.

Construction continued at the Substation/Switchyard and O&M Facility during this construction period. At the Substation/Switchyard, construction crews were observed erecting steel, continuing with the underground conduit work, and rebar construction for electrical tie-ins (see photo 7). Construction activities associated with establishing the foundation for the turning structures that will be utilized to tie-in the onsite Substation/Switchyard with the Sunrise Powerlink were observed being completed within the approved work limits. At the O&M facility, construction crews were continuing to work on the masonry block installation, structural steel installation, foundation pours, and installation of the roof. Trenching activities were also observed adjacent to the O&M facility (see photo 8). During the completion of specific work efforts or periods of inactivity, the gates to the O&M facility, Substation Switchyard, and Laydown are closed, all trash is placed within covered bins, and all hazardous materials are properly stored.

Based on the BLM's third-party ECM's observations, all crew members working on the project site have been WEAP trained. Upon completing of WEAP training attendees are provided a sticker for their hard hat indicating they have completed required WEAP training.

See Section "Issues/Concerns with Applicable Conditions of Certification" above for a further discussion regarding environmental compliance status.

Construction Schedule:

Scheduled Activities for Next Week: The anticipated construction activities associated for 9.24.12 through 9.30.12 includes:

- Roadway Improvements & Turbine Pad Sites Clearing
 - Continue roadway and turbine pad site improvements.
- Wind Turbine Foundation Construction
 - Continue wind turbine foundation construction consisting of excavations, base pour and pedestal pour.

- Underground Collection Lines
 - Continue excavation, conductor placement and backfill associated with underground collection lines.
- O&M Facility
 - Interior wall installation, metal deck and roof installation, electrical conduit installation, masonry block construction, steel erection on building 2, and construction of structural columns.
- Switchyard/Substation
 - Steel erection, setting equipment, transformer delivery and installation, and control house wiring.
- Turbine Deliveries
 - Deliver the components for seven turbines.
- Turbine Erection
 - Crews mobilizing turbine components to site and erecting turbine towers and rotors. 11 turbines are anticipated to be erected.

Potential Delays to the Online Date of the Project

- None identified at this time.

Plan Review Submittal Items

- None identified at this time.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	5.14.12	<p>Clearing and grading of the following facilities:</p> <ul style="list-style-type: none"> • 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	6.27.12	<p>Clearing and grading of the following facilities.</p> <ul style="list-style-type: none"> • 112 turbines. • 2 MET towers • 3.4-acre O&M facility • 10-acre temporary laydown area • Temporary connex storage areas • Temporary crane walk corridors <p>Excavation and installation for all project infrastructure including foundations, collection system, electrical utility, and communication systems.</p> <p>Structural erection for all approved project features including concrete foundations, structural steel, wind turbine towers, MET towers, and the wind farm substation.</p> <p>Electrical wiring, testing, and pre-commissioning of wind turbines, MET towers, collection electrical system and wind farm substation.</p> <p>Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at substation and switchyard.</p> <p>Structure installation at the SDG&E energy switchyard.</p>	Yes

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 turbine 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	7.2.12	Turbine micro-siting and road re-alignments to minimize potential disturbance to environmentally sensitive resources.	Approved	7.12.12
6	7.3.12	Additional temporary work space for construction and permanent access to the transmission line turning structures at the substation/switchyard.	Approved	7.24.12
7	6.26.12	Modify alternate turbine locations included in the Record of Decision.	Approved	8.1.12
8	7.20.12	Re-alignment of an access road to wind turbine #9 to minimize potential disturbance to environmentally sensitive resources.	Approved	7.27.12
9	7.20.12	Re-alignment of underground collection line corridor between County Route S2 and Dos Cabezas Road.	Approved	7.30.12
10	7.31.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Approved	8.10.12
11	7.27.12	Micro-siting turbine location to accommodate a third party interest group.	Approved	8.16.12
12	8.14.12	Work space for wind turbine 103, 134 and 135	Approved	8.17.12
13	8.16.12	Collection line routing for wind turbines 155, 156 and 159.	Approved	8.17.12
14	8.21.12	Micro-siting wind turbines 86 and 87 and a road re-alignment to minimize potential disturbance to environmentally sensitive resources.	Approved	8.21.12
15	8.22.12	Micro-siting wind turbines 26, 27, and 28 to accommodate a third party interest group.	Approved	9.4.12
16	8.20.12	Work space requirements associated with support safety tag lines.	Approved	8.23.12
17	8.22.12	Work space modifications at wind turbine 69 pad site.	Approved	8.30.12
18	8.28.12	Re-alignment of underground collection line corridors near wind turbines 88 and 131.	Approved	9.5.12
19	8.31.12	Re-alignment of an access road to wind turbine 73 to minimize potential disturbance to environmentally sensitive resources.	Approved	9.17.12
20	8.31.12	Re-alignment of two access roads to wind turbines 30 and 78 to minimize potential disturbance to environmentally sensitive resources.	Approved	9.13.12

Variance Request No.	Submitted	Description	Status	Approval Date
21	9.13.12	Re-alignment of two access between wind turbines 10 and 11 and wind turbines 81 and 87 roads to minimize potential disturbance to environmentally sensitive resources	Pending	N/A
22	9.19.12	Re-alignment of underground collection line corridor from wind turbine 90 to 93 and extension of two turning radii near wind turbines 92 and 95.	Pending	N/A
23	9.21.12	Re-alignment of underground collection line corridor along County Highway S2, relocation of a crane walk corridor from wind turbine 107, and medication of a collection line corridor and access road near wind turbine 64.	Pending	N/A

Photographs from Week



Photo 1: Construction crews utilize water to minimize dust emissions in accordance with the Dust Control Plan (MM-Air-1).



Photo 2: A paleontological monitor observes excavation activities occurring in sensitive fossil bearing formations in accordance with MM-Paleo-1.



Photo 3: A construction worker orients lights downwards during nighttime construction activity in accordance with MM-VIS-2.



Photo 4: A "Keep Covered" sign is affixed to all trash receptacles to remind construction crews to securely cover trash receptacles at all times in accordance with MM-Wild-1j.



Photo 5: Construction crews wash wheel wells and tires on heavy construction equipment in accordance with the Integrated Weed Management Plan (MM-Veg-1d).



Photo 6: A concrete base pour is completed at a wind turbine foundation during the evening hours.



Photo 7: Construction crews continue construction at the 30-acre Substation/Switchyard.



Photo 8: Trenching activities associated with installation of the 34.5 kV underground collection lines continue along Dos Cabezas Road adjacent to the O&M facility.