BLM Authorized Officer
Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 9.24.12 through 9.30.12

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 9.24.12 through 9.30.12.

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 9.25.12, 9.26.12 and 9.27.12, ECM's observed brief dust flare-ups 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 to water down access roads in order to minimize dust emissions from vehicles travelling along unpaved access roads.

Trash Management: 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 9.25.12 an ECM observed two black trash bags located inside the excavation pit at a wind turbine pad site. The lead biological monitor was immediately notified to remove the trash bags from the excavation pit. During a subsequent

review of the excavation pit, an ECM observed that the trash bags were removed In addition, on 9.29.12 an ECM observed an uncovered trash bin at the 30-acre Substation/Switchyard. The construction contractor was notified of the uncovered trash bin and an ECM later observed the trash bin to be covered. The construction contractor has been actively working with construction personnel to maintain on-site trash and to ensure all trash receptacles are covered.

Work Limits: On 9.27.12 an ECM observed two instances where work occurred outside of the approved disturbance limits. The first instance occurred at a wind turbine pad site where excavated materials were observed to be outside the approved work limits. The area measured approximately 2' by 2' feet and additional stakes and flags have been put in place to ensure all work activities remain within the approved work limits. The second instance occurred when a cement truck became stuck outside the approved work limits at a turbine pad site location. There were tire tracks that extended approximately 10 feet beyond the approved work limits. In each case the lead biological monitor was notified and no impacts 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 and pouring concrete for the turning structures for the Sunrise Powerlink tie-in, and erecting steel, delivering equipment, and installation of the control house wiring at the 30-acre Substation/Switchyard. Six turbines were erected during the reporting period including wind turbines. To date approximately 86 wind turbine foundations have been excavated, 73 wind turbine foundations concrete pours have been completed, 31 rotors have been assembled, and 26 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 (MM-Air-1) (see photo 1). In addition a soil binding agent is being utilized along access roads and stockpiles to stabilize topsoil, minimize dust emissions, and minimize erosion in areas that have been disturbed as a result of construction activities (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 maintaining concrete washouts, 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.

ECM's and the lead biological monitors completed routine site observations to ensure trash receptacles are being covered in accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j). With the exception of the instances noted above in Section "Issues/Concerns with Applicable Conditions of Certification", trash receptacles were observed being covered along the ROW. Covers consist of tarps and plastic lids that are secured to the trash bins (see photo 3). In accordance with the Construction Waste Management Plan (MM-PHS-9) ECM's observed all trash being removed from the project site on a regular basis and as previously discussed, all trash receptacles covered.

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 limits are properly delineated. ECM's also observed the exclusionary fence surrounding the temporary water pond being maintained (see photo 4).

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 5). 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 (see photo 6). At the O&M facility, construction crews were continuing to work on the masonry block installation, structural steel installation, and installation of the roof (see photo 7). Wind turbine erection continued during the reporting period with a total of 26 wind turbines erected to date (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 Yard 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 10.1.12 through 10.7.12 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, roof installation, and electrical conduit installation. Construction activities at the warehouse building includes masonry block and roof installation.
- 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. Ten 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

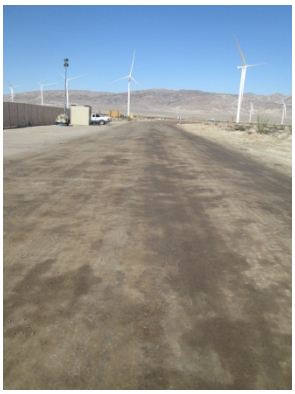
NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	5.14.12	Clearing and grading of the following facilities: • 12-acre temporary laydown yard • 30-acre Substation/Switchyard • Temporary and permanent access road/collection corridors and permanent turbine area for 71 turbines. • Performance 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	6.27.12	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.	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 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	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 87and 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	Approved	9.28.12
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
24	9.27.12	Re-alignment of an access road between wind turbines 19 and 20 and micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A

Photographs from Week

	
Photo 1: Construction crews utilize water to minimize dust emissions during a crane walk in accordance with the Dust Control Plan (MM-Air-1).	**Photo 2:** A soil binding agent is placed along access roads to minimize dust emissions in accordance with the Dust Control Plan (MM-Air-1).
	
Photo 3: Trash receptacles are covered and labeled in accordance with the Raven Control Plan (MM-Wild-1j) and Construction Waste Management Plan (MM-PHS-9).	**Photo 4:** The exclusionary fence placed along the limits of the temporary water pond is being maintained and routinely inspected for tears or gaps by the environmental monitors.

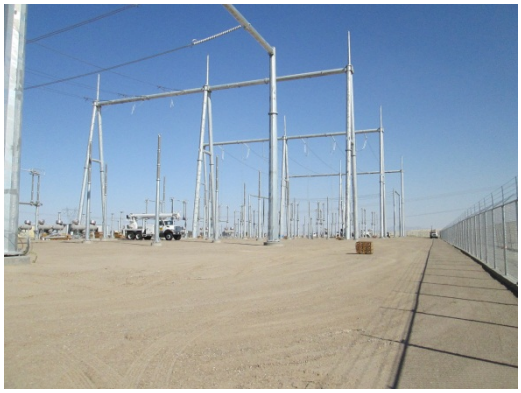


Photo 5: Construction crews continue construction at the 30-acre Substation/Switchyard.	**Photo 6:** A concrete base pour is completed for a turning structure associated with the tie-in to the Sunrise Powerlink.
	
Photo 7: Construction continues at the O&M facility as crews complete the installation of roofing materials.	**Photo 8:** Crews utilize a large crane to install a rotor to the nacelle via use of safety tag lines.