



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 10.8.12 through 10.14.12

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 10.8.12 through 10.14.12.

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: ECM's observed minor dust flare-ups at turbine foundation excavation sites throughout the reporting period. At the time the dust flare-ups were observed the ECM's also observed water trucks were being mobilized to suppress the dust flare-ups. Instances where dust flare-ups were observed and water trucks were not identified to be in-route to suppress dust, the construction contractor and lead environmental monitor were contacted by an ECM. Upon notification being provided, excavation activities were suspended and resumed when additional water trucks were mobilized to the area in order to minimize dust emissions from construction activities.

As seen in Weekly Report #21, ECM's observed construction crews exceeding the posted speed limit on 10.3.12. Construction crews were provided reminders of the posted speed limit along

access roads. In addition, speed limit signage has been posted along access roads to notify construction personnel of the speed limit restrictions in accordance with MM-Air-3.

Storm Water Pollution Prevention Plan (SWPPP): As noted in Weekly Report #21, the stabilized construction entrances to a wind turbine access road were observed to be partially buried and not providing adequate track-out prevention. The stabilized construction entrances were established to reduce the potential for track-out along paved roadways in accordance with the Dust Control Plan (MM-Air-1). On 10.5.12, an ECM noted that two access roads were partially eroded and buried and required maintenance. The effects of the maintenance effort will be reported in Weekly Report #23.

Trash Management: In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash on site must be kept in covered trash receptacles with lids that can be securely fastened. Both the environmental monitors and construction crews have been observed covering trash receptacles on a regular basis to meet the intent of MM-Wild-1j. During this reporting period waste bins were observed by ECM's to not be fully covered at the Laydown Yard and at a turbine site on 10.11.12. The waste bins that were observed to be uncovered were reported to the lead environmental monitor and upon the notification being provided the bins were covered by an environmental monitor.

Construction Activities

Construction activities conducted for this period consisted of mobilizing and erecting turbine tower and rotors, constructing and improving wind turbine foundations (excavation, base pour, pedestal pour, installation of rebar, trenching and installing line within the collection line corridors, roadway improvements, interior wall, duct, ceiling tile, fire suppression tank and roof installation at the O&M Building, and installing wiring and testing transformer equipment at the 30-acre Substation/Switchyard. Five turbines were erected during the reporting period. To date approximately 92 wind turbine foundations have been excavated, 82 wind turbine foundations concrete pours have been completed, 42 rotors have been assembled, and 35 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). Stabilized construction entrances have been established and are being maintained at locations where project access roads intersect paved access roads. The stabilized construction entrances consist of rock aprons to minimize track-out from construction equipment along paved access roads and to prevent fugitive dust. See Section titled “Issues/Concerns with Applicable Conditions of Certification” above for a further discussion regarding environmental compliance.

Throughout the reporting period, ECM’s reported observations to ensure good housekeeping practices were being implemented on a day-to-day basis in accordance with the SWPPP and MM Haz-6. Drip pans have been observed beneath construction equipment staged along the ROW to minimize the potential for oil stains.

Construction activities occurring during this reporting period consisted of nighttime work as disclosed in the Plan of Development and EIS. ECM’s were onsite during all nighttime work to ensure the night lighting met the requirements established in MM-VR-2 (see photo 2).

In accordance with MM-Wild-1d, 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 were monitored by a biological monitor during all ground disturbance activities to ensure construction activities remain within the approved work limits and that work limits are properly delineated.

In accordance with the Habitat Revegetation Plan (MM-Veg-2b), the lead environmental monitor was observed relocating Wolf’s Cholla along access roads and turbine pad sites prior to initial ground disturbance (see photo 3).

In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash onsite must be kept in covered trash receptacles. ECM’s and the lead biological monitors completed routine site observations to make sure trash receptacles were covered. With the exception of the instances noted above, trash receptacles were observed being covered along the ROW (see photo 4). Covers consisted of tarps and plastic lids 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.

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 10.15.12 through 10.21.12 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 pedestal pour, and backfill.
- Underground Collection Lines
 - Continue excavation, conductor placement and backfill associated with underground collection lines.
- O&M Facility
 - Interior drywall, insulation, ceiling tile, light, door, mezzanine and electrical conduit installation.
- Switchyard/Substation
 - Control wiring and buss installation, equipment assembly, and transformer testing.
- Turbine Deliveries
 - Deliver the components for eight turbines.
- Turbine Erection
 - Mobilize turbine components to site and erecting turbine towers and rotors. Eight 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: <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	Clearing and grading of the following facilities. <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 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 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	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.	Approved	10.2.12
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.	Approved	10.9.12
25	10.4.12	Re-alignment of an access road between wind turbines 16 and 17 to minimize potential disturbance to environmentally sensitive resources.	Approved	10.10.12
26	10.11.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A
27	10.12.12	Micro-siting a turbine location to accommodate a third party interest group.	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: Construction lighting is oriented downward during nighttime construction work in accordance with MM VR-2.



Photo 3: A construction crew relocates a Wolf's Chollas in accordance with the Habitat Revegetation Plan (MM-Veg-2b).



Photo 4: Waste bins at the laydown yard are covered in accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j).



Photo 5: Crews complete installation of the collection line along County Highway S2.



Photo 6: Construction crews continue installation of above-grade substation components at the 30-acre Substation/Switchyard.



Photo 7: Delivery of wind turbine components were completed throughout the reporting period. Environmental monitors are onsite to ensure all activities associated with wind turbine component deliveries are completed within the approved work limits.



Photo 8: Construction crews completing construction activities at a wind turbine foundation within the approved work limits.