



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 12.24.12 through 12.30.12

Summary

The Bureau of Land Management is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement for the Ocotillo Wind Energy Facility Project. The Bureau of Land Management has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the Final Environmental Impact Statement 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 Bureau of Land Management's third-party Environmental Compliance Monitors (ECMs), the compliance status of mitigation measures required by the Environmental and Construction Compliance Monitoring Plan, and anticipated construction activities for the following week. This weekly report covers construction activities for the reporting period of 12.24.12 through 12.30.12.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by the Bureau of Land Management Environmental Compliance Monitors during daily site observations. The 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

Hydraulic Fluid Leak (Mitigation Measure Water-10): On December 27, 2012 a hydraulic fluid leak was observed in the hub section (nacelle) of a wind turbine. The leak was isolated to a connection in the hydraulic system in the hub. There was a small amount of residual fluid in the blades (less than five gallons) that was released to the ground below. The stained soil was located within the disturbed area around the wind turbine and the majority was within 30 feet of the turbine tower base.

In accordance with the Spill Prevention, Control, and Countermeasure (SPCC) Plan, the spill that occurred was classified as a "minor". ECMs observed the turbine manufacturer repairing and

cleaning the hub section of the wind turbine along with construction crews cleaning and removing the stained soil in accordance with the SPCC (see photo 1). As a result of this spill, the ROW holder is completing inspections of the hydraulic system in the hub (nacelle) for all turbines to minimize the potential for any future hydraulic leaks.

Standing Water (MM PHS-9): On December 26, ECMs observed instances of standing water in secondary containment receptacles and at the concrete washout adjacent to a turbine pad site. In accordance with MM PHS-9, construction activities shall not be allowed to accumulate water to avoid attracting wildlife and eliminate the risk of generating disease. The lead ECMs communicated the concern to the construction manager and the issue was remediated

Construction Activities

Activities during this reporting period consisted of site restoration, Operations & Maintenance building improvements, and installation of the Substation/Switchyard protective berm and Phase II Grading. Construction activities associated with turbine foundation pours, foundation backfills, trenching and installation of cables for the collection lines, turbine deliveries, and turbine erection are complete for the 2012 calendar year.

To date approximately 101 wind turbine foundations have been excavated and 101 wind turbine foundations concrete pours have been completed.

Compliance

ECMs 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 preconstruction plans have been completed as indicated in Notice to Proceed #1 thru #3.

Ocotillo Express LLC has contracted with a biological consulting firm approved by the Bureau of Land Management to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. During this reporting period, biological monitors were observed conducting surveys during ground disturbance activities associated with site restoration in accordance with Mitigation Measure Wild-1b and during all other ground disturbance activities (see photo 2). Re-vegetation activities continued at turbine pad sites in accordance with Mitigation Measure Veg-2b and the associated Habitat Re-vegetation Plan. Re-vegetation activities included placement of vertical mulch (see photo 3) and de-compacting and replacing topsoil in areas where construction activities are complete and where no further construction traffic is anticipated to occur.

Construction activities continued during this reporting period associated with completing the berm installation around the SDG&E substation for flood control purposes. In addition, grading activities continued at phase II of the substation. ECMs observed water trucks suppressing potential fugitive dust associated with these activities in accordance with MM Air-1 and the affiliated Fugitive Dust Control Plan (see photo 4).

Based on the ECMs observations, all crew members working on the project site have completed the Worker Environmental Awareness Program. Upon completing of the Worker Environmental Awareness Program attendees are provided a sticker for their hard hat indicating they have completed required Worker Environmental Awareness Program training. Trainings continue to occur on the project site once a week.

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 12.31.12 through 1.7.13 includes:

- O&M Facility
 - Paint exterior structural steel, complete bird deterrent install on observation tower, roof installation, parking lot grading
- Substation/Switchyard: Continued berm work and phase II grading
- Complete Site Reclamation/Re-vegetation (vertical mulch and re-planting)
- No work is anticipated for 1.1.13.

Potential Delays to the Online Date of the Project

- None identified at this time.

Notice to Proceed (NTP)

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/Switchyard. Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at Substation/Switchyard. Structure installation at the SDG&E energy switchyard.	Yes
3	12.21.12	Full commercial operations for 112 wind turbines and all associated project facilities.	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 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 Requests

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.	Approved	10.15.12
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.	Approved	11.14.12
27	10.12.12	Micro-siting a turbine location to accommodate a third party interest group.	Approved	10.22.12
28	10.16.12	Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.19.12
29	10.16.12	Re-alignment of an access road and shifting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.26.12
30	10.17.12	Re-alignment of an access road and micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.25.12
31	10.17.12	Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.25.12
32	10.19.12	Re-alignment of an access road and underground collection line corridor.	Approved	10.25.12
33	10.20.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Approved	10.24.12
34	11.1.12	Shifting turbine locations to accommodate a third party interest group, re-alignment of an access road to minimize potential disturbances, and removal of an approved equipment laydown area.	Approved	12.6.12
35	11.21.12	Work space modifications at wind turbine pad sites.	Approved	12.7.12
36	11.27.12	Micro-siting a turbine location to mitigate geotechnical siting considerations.	Approved	12.19.12

Photographs from Week



Photo 1: Soil removed from the nacelle where hydraulic fluid had been observed is contained prior to being removed offsite for proper disposal in accordance with the SPCC.



Photo 2: ECMs observed grading activities associated with the phase II substation. Both a biological and archeological monitor was present during initial ground disturbance in accordance with the ECCMP.



Photo 3: ECMs observed planting of vertical mulch in accordance with Mitigation Measure Veg-2b and the associated Habitat Re-vegetation Plan



Photo 4: Water trucks apply water during grading activities in accordance with the Fugitive Dust Control Plan (MM Air-1).