BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 11.26.12 through 12.2.12

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 (ECMs), 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 11.26.12 through 12.2.12.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by BLM ECMs 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

Access Roads: An ECM observed on 11.28.12, crews completing construction activities associated with the Sunrise Powerlink turning structures accessing the work area via a WECO route that is not approved for use by construction vehicles. The incident was reported to the lead environmental monitor onsite. As a result of the incidents noted above, the lead environmental monitor distributed maps to all construction personnel at the daily morning meeting to ensure all personnel are aware of the WECO routes that are authorized for project use.

Storm Water Pollution Prevention Plan (SWPPP) (MM WATER-9) and Spill Prevention, Control, and Countermeasure Plan (SPP) (MM WATER-10): ECM's reported concrete waste that needed to be cleaned-up in accordance with WM-8 in the SWPPP. ECM's reported the observations to the

construction contractor and lead environmental monitor to ensure the concrete is cleaned-up prior to any restoration activities being completed.

ECM's reported lubricants and fluids being utilized for turbine commissioning and staged at the laydown yard that did not contain adequate secondary containment as required by WM-4 of the SWPPP. ECM's reported the observations to the construction contractor and lead environmental monitor to ensure all materials are placed in secondary containment at the completion of each work day.

Raven Control Plan (MM-Wild-1j): In accordance with Section 4.1 of the Raven Control Plan, all trash onsite must be kept in covered trash receptacles. ECM's reported dumpsters needing cover to the lead environmental monitor. The dumpsters were covered upon notification being provided to the lead environmental monitor.

ECM's observed litter debris from construction crews periodically throughout the reporting period. The observations were reported to the lead environmental monitor and the construction contractor has responded by reminding crews to maintain a clean work site and by designating individuals to pick-up debris at the completion of the work day. In addition, OE LLC has allocated additional workers to ensure that trash is being managed in accordance with the waste management procedures on site.

Construction Activities

Construction activities consisted of turbine deliveries, erecting wind turbines, assembling rotors and blades, electrical work at turbine sites, improvement of access roads, trenching and installation of cables for the collection lines (see photo 1), O&M Building improvements (interior finishes, HVAC, septic tank installation) equipment testing at the 30-acre Substation/Switchyard and installation of the substation protective berm (see photo 2).

To date approximately 101 wind turbine foundations have been excavated and 97 wind turbine foundations concrete pours have been completed. 85 turbines have been erected to date.

With 75 percent of the project's turbines erected and approximately 88 percent of initial ground disturbance complete, OE LLC is also focusing on site reclamation activities in accordance with the plan of development and proscribed mitigation measures (see photo 5). Additionally, ECMs observed progress with the Advanced Biological Observation Command and Control Center (ABOCCC) (see photo 3) at the O&M facility as identified in MM Wild-1p and the associated Avian and Bat Protection Plan (ABPP) (see discussion in the Compliance section below). Work also continued with the SDG&E turning structures to the onsite substation (see photo 4).

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 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 and ensuring that flagging of ESAs remained intact. ECMs also observed archeological monitors and Native American Monitors onsite during initial and non-initial ground disturbing activities, monitoring in accordance with the project requirements.

OE LLC has also contracted with a biological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. The biological consultants submitted monthly reports such as the Common Raven (CORA) Nesting Survey Report (as required by the Raven Control Plan) and the BUOW observation log to the ECM team. As discussed last week, ECMs observed the collapsing of two unoccupied BUOW burrows in accordance with BUOW Mitigation and Monitoring Plan (Wild1n-2a). This week, the biological consulting firm provided a revised approach to siting artificial BUOW burrow locations (2:1 mitigation ratio for burrows) which is currently under review by the BLM, USFWS, and CDFG.

ECMs observed multiple construction activities associated with the O&M facility, including implementation of best management practices identified in the Surface Treatment Plan (MM VR-3) and Screening Plan (MM VR-4). These plans were designed to minimize visual impacts associated with the industrial material used for these facilities through use of color schemes, steel coating, bird deterrent material, etc. and to aid in blending these components into the surrounding desert landscape. ECMS observed construction progress at the ABOCCC as required per the ABPP. The 50' ABOCCC will include a state of the art Merlin radar system onsite for the life of the project and is specifically tiered to collect data to potentially curtail turbines in order to minimize direct impacts to golden eagles. The system will also be used for data collection purposes for general avian and bat species (see photos 3 and 4).

ECMs observed activities related to site restoration this week, including re-vegetation activities at turbine pad sites in accordance with MM Veg-2b and the associated Habitat Restoration/Re-vegetation Plan (HRRP) (see photo 5). Re-vegetation activities included de-compacting and replacing topsoil in areas where construction activities are complete and where no further construction traffic is anticipated to occur at the turbine sites. Construction crews were made aware of active re-vegetation activities on the project site and were provided protocols for avoidance.

ECMs continued to observe biologists completing routine inspections at potential wildlife pitfall locations, ensuring that these pitfalls included wildlife escape ramps and/or were covered per MM-Wild-1b.

Water pulls were observed pre-watering access roads and areas under active construction in order to minimize dust in accordance with the Dust Control Plan and MM Air-1 and watering excavation pits. Also in accordance with MM Air-1 and the SWPPP, ECMs noticed diligence with minimization and cleaning of track out along Highway S2 and Mine Road and observed preventative track-out measures such as stabilized construction entrances/ rock aprons in good condition (see photo 6).

ECMs observed diligence with multiple signage requirements, including designation of access roads and avoidance areas for OWEF construction crews in order to control unauthorized access (see photo 7). Access control signage has been posted to driveway locations to new project roads off HWY S2 in accordance with MM CUL-11, and associated Access Control Plan.

ECMs observed marking of jurisdictional waterways in accordance with MM WATER-1 and associated Streambed Alteration Agreement with CDFG (see photo 8). Flagging these areas identifies the limits of construction grading and the areas that may need additional surveys performed by the qualified biologist on site.

Based on the ECMs 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. WEAP Training continues to occur on the project site twice 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 12.3.12 through 12.9.12 includes:

- Access Improvements (south of I- 8)
- Wind Turbine Foundation excavation (south of I-8)
- Continue wind turbine foundation construction consisting of two foundation base pours
- O&M Facility
    - Interior finishes, HVAC, Septic Tank installation, Erect steel for observation tower
- Switchyard/Substation
    - Energization Testing
- Turbine Deliveries
- Turbine Erection
    - Crews mobilizing turbine components to site and erecting turbine towers and rotors. Nine turbines are anticipated to be erected.
- Site Reclamation

Potential Delays to the Online Date of the Project

- 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
3	11.27.12	Full commercial operations for 112 wind turbines and all associated project facilities.	Pending

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.	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.	Pending	n/a
35	11.21.12	Work space modifications at wind turbine pad sites.	Pending	n/a
36	11.27.12	Micro-siting a turbine location to mitigate geotechnical siting considerations.	Pending	n/a

Photographs from Week

Photo 1: ECMs observed biological, cultural, and Native American monitors performing roles and responsibilities as outlined in the ECCMP during initial ground disturbance.

Photo 2: ECMS observed construction crews placing rip-rap around the substation for flood protection. Water wagons were being utilized to keep dust suppressed in accordance with MM Air-1.

Photo 3: ECMs observed crews constructing the avian lookout tower as required per the ABPP. The lookout tower is adjacent to the O&M facility, which consists of "buff" colored masonry in order to minimize visual impacts in accordance with the Surface Treatment Plan.

Photo 4: Crews were observed erecting steel lattice towers associated with the turning structures that will provide a connection from the onsite substation to the Sunrise Powerlink.

	
Photo 5: Topsoil staged onsite from initial ground disturbance is utilized to restore a wind turbine pad site in accordance with MM-Veg 2b.	**Photo 6:** ECMs observed rock aprons being maintained to minimize trac-out along Old Mining Road in accordance with the SWPPP and MM Air-1.
	
Photo 7: Signage has been posted where WECO routes intersect wind turbine access roads to notify construction workers where WECO route use is not permitted in accordance with the Access Control Plan (MM-CUL-11).	**Photo 8:** ECMs observed marking of jurisdictional waterways in accordance with the Streambed Alteration Agreement (MM WATER-1).