# MITIGATION MONITORING, COMPLIANCE AND REPORTING PROGRAM

### 1.0 Introduction

Section 21081.6 of the Public Resource Code requires all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a mitigated negative declaration or an Environmental Impact Report (EIR). The monitoring or reporting program must ensure implementation of the measures to mitigate or avoid the potential for significant adverse environmental impacts identified in a mitigated negative declaration or EIR. (Tracking CEQA Mitigation Measures Under AB1380, Third Edition, March 1996.)

The following Mitigation Monitoring, Compliance and Reporting Program (MMCRP) has been prepared to meet the California Environmental Quality Act (CEQA) requirements for preparing a MMCRP for the Draft EA/IS for the Deep Rose Geothermal Exploration Project. The enforcement responsibilities for each mitigation measure would vary depending upon the agency and issues involved. Enforcement measures may include a written notice of violation, fines levied in exceedances of specified standards, or suspension of activities that may affect endangered species, significant cultural resources or human health and safety.

The Division of Oil Gas and Geothermal Resources (DOGGR) may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as affected jurisdictions and cities, and the California Department of Fish and Game (CDFG). The number of construction monitors assigned to the project will depend on the number of concurrent construction activities and their locations. The California State Lands Commission (SLC) or its designee(s), however, will ensure that each person delegated any duties or responsibilities are qualified to monitor compliance.

Mitigation measures and monitoring are only required for those resource areas for which the potential for significant environmental impacts have been identified within the Draft EA/IS. For the proposed project these resources include: geology/soils, hydrology, biological resources, cultural resources, air quality, noise, and hazardous materials and health & safety, and transportation. For all remaining resources, the proposed project would not result in any associated significant environmental impacts, and therefore do not have any mitigation monitoring requirements.

Table MMCRP-1 summarizes the impacts and mitigation for the Proposed Action. A more detailed discussion of impacts for each resource can be found in the Environmental Consequences section (Chapter 4) of the Deep Rose Geothermal Exploration Project Environmental Assessment/Initial Study/Mitigated Negative Declaration. For the purposes of this MMCRP, each mitigation measure will be referenced as identified in Table MMCRP-1.

# 1.1 Monitoring Authority

Primary monitoring activities for the proposed project will be the responsibility of Environmental Monitors (EMs) who will coordinate closely with personnel form the DOGGR program office and the BLM Ridgecrest Field Office. Both offices have managed similar projects, and have extensive experience in geothermal drilling and environmental management. The BLM would have the primary responsibility of oversight of the access road and waterline, and DOGGR would have primarily responsibility for the well pad site and all exploratory activities on State lands. All documentation generated under this MMCRP will be available for review at either the DOGGR state program office in Sacramento, California or at the BLM Filed Office in Ridgecrest, California.

Several EMs will be on-site throughout project construction and drilling, and routine monitoring will be conducted by DOGGR and BLM personnel. This will constitute the fundamental standard of compliance criteria to ensure proper implementation of ALL proposed mitigation measures, as defined in the Draft EA/IS. Observance of noncompliance will be documented by the EM and forwarded to the construction/drilling contractor for immediate corrective action. The DOGGR or BLM will suspend activities if remedial activities do not comply with the mitigation measures.

The proposed project is also under the regulatory management of the Great Basin Air Pollution Control District (GBAPCD) for air quality issues such as hydrogen sulfide, oxides of nitrogen, and fugitive dust management, as well as the Lahontan Regional Water Quality Control Board (LRWQCB) for groundwater and waste discharge management. Regulatory personnel from these agencies are expected to monitor the project and will provide written reports of noncompliance to the DOGGR/BLM.

#### 1.2 Enforcement Responsibility

For those portions of the Proposed Project which occupy California State Lands, The DOGGR is responsible for enforcing the procedures adopted for monitoring through the environmental monitor assigned to each construction spread. Any assigned environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the SLC or its designee.

# 1.3 Mitigation Compliance Responsibility

The Applicant is responsible for successfully implementing all the mitigation measures in the MMCRP, and is responsible for assuring that these requirements are met by all of its construction contractors and field personnel. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

# 1.4 General Monitoring Procedures

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The DOGGR (on California State Lands) and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the projects daily operations with Deep Rose LLC. In order to oversee the monitoring procedures and to ensure success, the environmental monitor assigned to each construction spread must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

# 1.5 Summary of Environmental Impacts and Mitigation and Monitoring Measures

Table MMCRP-1 summarizes the Deep Rose Geothermal Exploration Project's mitigation measures as required in accordance with the project's Mitigated Negative Declaration, as well as the responsible governing agency overseeing the specific mitigation measure.

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TABLE MMCRP-1 Deep Rose Geothermal Exploration Project Mitigation, Monitoring, and Reporting Plan Summary of Environmental Impacts, Mitigation, and Monitoring Measures for the Proposed Action.

RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING	RESPONSIBLE
			A BLM Field Representative and Environmental Monitor (EM) would be on-site during construction activities to verify and ensure that mitigation measures to control and direct surface runoff are implemented.	BLM and Brwironmental Monitor
Geology and Soils	Impacts to soils from water erosion, wind erosion, and compaction.		The EM would verify that mitigation is followed.	Environmental Monitor
			The EM would verify that mitigation is followed.	Environmental Monitor
		. ,	Random field inspections by DOGGR inspectors during drilling would verify that mitigation is followed.	DOGGR
		GEO-5: Water pipelines would be inspected daily to eliminate the potential for	The EM would verify that mitigation is followed.	Environmental Monitor

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RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING	RESPONSIBLE
			MEASURES	ENTITY
		soil erosion damage caused by		
		- 1		
		GEO-6: To reduce the risk of soil erosion	Random field inspections	DOGGR
		due to blowouts, routine testing	by DOGGR inspectors	!
		would be conducted on a BOPE in	during drilling would	
*********		accordance with DOGGR	verify that mitigation is	
		requirements.	followed.	
		GEO-7: Up to 4 inches (10 cm) of topsoil	A BLM Field	BLM and
		would be selectively stripped and	Representative and	Environmental
		salvaged from all newly disturbed	Environmental Monitor	Monitor
*******		areas. Topsoil would be stockpiled	(EM) would be on-site	
		in several areas at the Deep Rose	during construction	
	,	project site and retained for	activities to verify and	
Geology and	Increased potential	replacement and revegetation at the	ensure that mitigation	
Soils	for the occurrence of	time of final reclamation. To reduce	measures to ensure	
CAAC	indirect effects to	erosion and sedimentation during	adequate salvage of	
	soils and difficulties	the life of the project, soil stockpiles	topsoil are implemented.	
	with the success of	will be temporarily revegetated with	7	
	reclamation.	noxious weed-free mixed cover		
		vegetation with an emphasis on		
		native species that possess the		
		ability to root quickly.		
		GEO-8: If the resource is proved to be	A BLM Field	BLM and
		unsuccessful, topography will be	Representative and	Environmental
		restored to near pre-existing	Environmental Monitor	Monitor
		contours at the well pad and all	(EM) would be on-site	
	•	upgraded access roads will be	during reclamation to	
		reclaimed to their original width of	ensure the success of	
		approximately six feet (1.8 m).	initial reclamation	
		These areas would ripped to reduce	activities.	
		compaction, covered with topsoil,		
		and reseeded with BLM approved		
		seed mixtures as described in		
	****	Appendix B - Reclamation Plan for		
		ine Deep Kose Geothermal		

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RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING	RESPONSIBLE
		Exploration Project.		
		HYD-1: The reserve pit would be constructed so that a minimum of one-half of the total depth is below the original ground surface on the lowest point	A field inspection by a DOGGR inspector during construction of the well pad and associated	DOGGR
	Potential impacts water resources from reserve pit overflow	within the pit. To prevent seapage of fluids, the reserve pit will be constructed by mechanical	facilities would verify and insure proper construction of the reserve pit.	
	or percolation.	compaction or lined with an impermeable polyethylene liner. If utilized, liners would be of		
		sufficient strength and thickness to withstand normal installation and		
		HYD-2: Deep Rose will develop and implement a Storm Water Pollution	The LRWQCB will verify	LRWQCB
Water		Control Plan (SWPCP) for project	submitted a SWPCP to	
Resources		related storm water runoff as	the Board prior to	
		required by the LRWQCB storm	commencement of	
		water inational Politition Discharge Elimination System (NPDES)	construction activities and has been issued a NPDES	
	7	permit requirements for "Discharges	permit for "Discharges to	
	Limited impacts to surface waters.	to Land with a Low Threat to Water Onality" and State Water Recourses	Land with a Low Threat	
		Control Board Order No. 99-08	State Water Resources	
		DWQ for storm water runoff	Control Board Order No.	
		accounted with construction activity. All conditions and	99-08.	
		stipulations of the permits issued by		
		LRWQCB will be incorporated as		
		standard operating procedures for		
		1		- Andrew Control
	riazard of potential release of liquid	HXD-3: Deep Rose will implement a Spill Prevention. Control. and	The LRWQCB will verify	LRWQCB
	petroleum products to	Countermeasures (SPCC) Plan	prepared and submitted a	

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RESOURCE	IMPACTS	M	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE
	persons and the environment.		in accordance with 40 CFR Part 112, dated December 1973 with	SPCC plan prior to commencement of	
			respect to petroleum hydrocarbon handling and spill prevention and	construction activities.	
			will submit the plan to the LRWQCB prior to the		<del></del>
		7	commencement of construction.		
		B10-1:	All areas to be disturbed will have boundaries flagged prior to	The EM would verify that	Environmental
			construction and all disturbances	merganon is tonowed.	AMOIIILOF
	Impacts to natural		will be confined to the flagged		
	vegetation		areas. All employees will be		
	communities.		instructed that their activities must be confined to locations within the		
			flagged areas. Deep rose will have		
			environmental monitors on-site		
			during construction activities.		
Biological	Increased potential	BIO-2:	All construction equipment will be	The EM would verify that	Environmental
Resources	tor the limited		power washed prior to its arrival at	mitigation is followed.	Monitor
	Invasion and		the project site to prevent the		
	establishment of		transportation and establishment of		
	noxious weed species.		noxious weeds in the project area.		
		BIO-3:	During reclamation, all disturbed	A BLM Field	BI.M and
			areas will be appropriately topsoiled	Representative and EM	Environmental
	Impacts to natural		and seeded with a BLM/DOGGR	would be on-site during	Monitor
	vegetation		approved seed mix per the	reclamation activities to	
	communities.	· · · · · · · · · · · · · · · · · · ·	specifications outlined in Appendix	verify and insure that all	
			b - Keciamation Plan for the Deep	disturbed areas are	
			Kose Geothermal Exploration	appropriately topsoiled	
	Increase in the	PIO 4	rrojeci.	and seeded.	
	potential for illegal	b10-4:	10 avoid the potential for mortality and harassment of wildlife all	The EM would verify that	Environmental
	kill and harassment		firearms and doos will be prohibited	minganon is followed.	Monitor.
	of wildlife.		from the project site and all workers		

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The EM would verify that Envi mitigation is followed. Mon mitigation is followed. Mon mitigation is followed. Mon mitigation is followed. Mon mitigation to the start of construction to locate potential areas that would be suitable for guzzler development.  Prior to any ground disturbing activities, CDFG will issue an Incidental Take Permit for	RESOURCE	IMPACTS	M	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
Potential to foster an unatural increase in opportunistic predators in the normal increase in opportunistic predators in the project area.  Project area.  Project area.  BIO-6: A maximum speed limit of 25 miles per week). This effort will reduce the attractiveness of the area to opportunistic predators such as coyotes, kit foxes, and common ravens.  BIO-6: A maximum speed limit of 25 miles per hour, miles otherwise posted, will be maintained while traveling on unpaved access roads on the potential for direct and indirect development of some wildlife species and wild horses in particular.  BIO-7: Prior to the onset of construction, be suitable for guzzlers in the project area as a south of a stand of development of one or more displacement of some source of water for wildlife (and in wild horses in particular, wild horses in the implementation of finis effort a fighting activities, will a squirect compensatory lands at a cube displacement of some wild a squire compensatory lands at a cube aguirer.  BIO-8: Under the project area as a potential areas that would come from either the water line or water storage trucks.  BIO-8: Under the project section of this effort of the start of development of one or more displacement of some source of water storage trucks.  BIO-8: Under the proposed CDFG Section into a squirred.  BIO-8: Under the proposed CDFG Section into a squirred.  BIO-8: Under the proposed CDFG Section into a squirred.  BIO-8: Under the proposed CDFG Section into a squirred.  BIO-8: Under the proposed CDFG Section into a squirred.  BIO-9: The propertial for the squirre compensatory lands at a construction of the squirred squirred.  BIO-9: The propertial for the squirred compensatory lands at a construction of the squirred squirred.  BIO-9: The propertial for the squirred compensatory lands at a construction of the squirred squirred.  BIO-9: The squirred compensatory lands at a construction of the squirred compensatory lands at a construction of the squirred compensatory lands at a construction of the squir				will be required to check under their vehicles prior to departing the project site.		
attractiveness of the area to opportunistic predators such as coyotes, kit foxes, and common ravens.  BIO-6: A maximum speed limit of 25 miles posted, will be maintained while traveling on unpaved access roads on the potential for whiche-wildlife related collisions.  BIO-7: Prior to the onset of construction, Deep Rose and the BLM will examine the potential for the construction to locate displacement of some guzzlers in the project area as a potential areas that would wildlife species and wild horses in particular.  BIO-8: Under the proposed CDFG Section impacts to the mignife compensatory lands at a squirrel.  BIO-8: Under the proposed CDFG Section impacts to the wild require compensatory lands at a squirrel.  BIO-8: Under the proposed CDFG Section stquirrel.  BIO-8: Under the proposed CDFG Section squirter.		Potential to foster an un-natural increase in opportunistic predators in the project area.	BIO-5:	Trash and food items will be disposed of promptly in predatorproof containers with resealable lids. Trash containers will be removed regularly (at least once per week). This effort will reduce the	The EM would verify that mitigation is followed.	Environmental Monitor
Potential for direct mortality to wildlife.  Potential for direct mortality to wildlife.  Potential for direct mortality to wildlife.  BIO-7: Prior to the onset of construction, and infigate and indirect displacement of some wild horses in particular.  Direct and indirect  BIO-8: Under the proposed CDFG Section impacts to the implementation of this effort water for disturbing activities, will acquire compensatory lands at a squirrel.  BIO-6: A maximum speed limit of 25 miles  mitigation is followed.  mitigation is followed.  mitigation is followed.  mitigation is followed.  Melbored will reduce the project strayeling access roads on the project strayeling access roads on the project area as a potential areas that would be construction of this effort would come from either the water line or water storage trucks.  BIO-7: Prior to the onset of construction, A BLM Field construction to the start of development of one or more and the propential for the construction to locate potential areas that would be source of water for wildlife (and in persistent of one or more from either the water line or water storage trucks.  BIO-7: Prior to the onset of construction, A BLM Field construction to force or more and the propertial for the start of development. The implementation of this effort would come from either the water line or water storage trucks.  BIO-8: Under the proposed CDFG Section disturbing activities, will acquire compensatory lands at a squirrel.  3:1 ratio within twelve months of Incidental Take Permit for any ground disturbing activities.				attractiveness of the area to opportunistic predators such as coyotes, kit foxes, and common ravens.		
Potential for direct  mortality to wildlife.  BIO-7: Prior to the onset of construction, and indirect displacement of some wild horses in particular.  Potential for direct and indirect  MIO-8: Under the proposed CDFG Section impacts to the implementation of this effort wild a squirrel.  BIO-8: Under the proposed CDFG Section in the project Applicant squirrel.  Would come from either the water for wild issue an squirrel.  Mojave ground source of water for wild in twelve months of force and squirrel.  Would come from either the water for disturbing activities, will acquire compensatory lands at a squirrel.  Will be maintained while traveling on the project strate on the project strate of construction to locate development of wild horses). Water for wildlife (and in particular, would come from either the water line or water storage trucks.  BIO-8: Under the proposed CDFG Section disturbing activities, will acquire compensatory lands at a squirrel.  SI Tatio within twelve months of force are accounted access to the squirrel.  Will be maintained while traveling access to the squirrel.  Will be maintained while traveling access to the start of construction to locate protect and indirect in the proposed CDFG Section development.  A BLM Field Representative would be on-site prior to the start of construction to locate protect and as a source of water for wild horses). Water for development.  BIO-8: Under the proposed CDFG Section distributing activities, will acquire compensatory lands at a first owill issue an access to the squirrel.			BIO-6:	A maximum speed limit of 25 miles per hour, unless otherwise posted.	The EM would verify that mitigation is followed	Environmental Monitor
mortality to wildlife.  mortality to wildlife.  mortality to wildlife.  project site. This effort will reduce the potential for vehicle-wildlife related collisions.  BIO-7: Prior to the onset of construction, Potential for direct and indirect and indirect some wild horses in particular, wild horses in particular, would come from either the water for particular, would come from either the water for impacts to the Mojave ground squirrel.  BIO-8: Under the proposed CDFG Section indirect and indirect will acquire compensatory lands at a squirrel.  BIO-8: Under the project Applicant disturbing activities, will acquire compensatory lands at a squirrel.  BIO-8: Under the project Applicant disturbing activities, will acquire compensatory lands at a squirrel.  BIO-8: Latio within twelve months of incidental Take Permit for	Biological   Resources	Potential for direct		will be maintained while traveling		MACHICAL
the potential for vehicle-wildlife related collisions.  BIO-7: Prior to the onset of construction, Deep Rose and the BLM will Representative would be examine the potential for the development of one or more ment of some species and species and source of water for wildlife (and in particular, wild horses). Water for the implementation of this effort would come from either the water line or water storage trucks.  BIO-8: Under the proposed CDFG Section 2081 permit, the Project Applicant to the will acquire compensatory lands at a 3:1 ratio within twelve months of incidental Take Permit for	w	mortality to wildlife.		project site. This effort will reduce		
I for direct  The formula of some examine the potential for the construction, and indirect  BIO-7: Prior to the onset of construction, and indirect  BIO-8: Under the project area as a ses in the implementation of this effort would come from either the water for wild not seed to the implementation of this effort would come from either the water for wild not seed to the project Applicant to the will acquire compensatory lands at a serial prior to the project Applicant for the project for the project Applicant				the potential for vehicle-wildlife related collisions.		
l for direct examine the potential for the examine the potential for the examine the potential for the development of one or more development of one or more guzzlers in the project area as a species and source of water for wildlife (and in particular, wild horses). Water for the implementation of this effort would come from either the water line or water storage trucks.  BIO-8: Under the proposed CDFG Section disturbing activities, will acquire compensatory lands at a ground 3:1 ratio within twelve months of incidental Take Permit for		The state of the s	BIO-7:	Prior to the onset of construction,	A BLM Field	BLM
ses in the implementation of this effort would come from either the water line or water storage trucks.  BIO-8: Under the project Applicant to the start of the implementation of this effort will acquire compensatory lands at a son-suite prior to the start of the project area as a construction to locate potential areas that would be suitable for guzzler development.  BIO-8: Under the proposed CDFG Section disturbing activities, will acquire compensatory lands at a strong and start of the locate months of locidental Take Permit for		Dotential for direct		Deep Rose and the BLM will	Representative would be	
species and source of water for wildlife (and in persistent of water for wildlife (and in persistent of water for wild horses). Water for the implementation of this effort would come from either the water line or water storage trucks.  BIO-8: Under the proposed CDFG Section 2081 permit, the Project Applicant to the will acquire compensatory lands at a ground 3:1 ratio within twelve months of incidental Take Permit for		and indirect		examine ure potential for the development of one or more	on-site prior to the start of construction to locate	
ses in particular, wild horses). Water for development.  the implementation of this effort would come from either the water line or water storage trucks.  BIO-8: Under the proposed CDFG Section at indirect 2081 permit, the Project Applicant disturbing activities, will acquire compensatory lands at a storage trucks.  BIO-8: Under the proposed CDFG Section disturbing activities, will acquire compensatory lands at a storage an 3:1 ratio within twelve months of incidental Take Permit for		displacement of some		guzzlers in the project area as a	potential areas that would	
the implementation of this effort  would come from either the water line or water storage trucks.  BIO-8: Under the proposed CDFG Section to the  will acquire compensatory lands at a ground 3:1 ratio within twelve months of incidental Take Permit for		wildlife species and wild horses in		source of water for wildlife (and in particular, wild horses). Water for	be suitable for guzzler develonment	
Iline or water storage trucks.  BIO-8: Under the proposed CDFG Section to the will acquire compensatory lands at a ground 3:1 ratio within twelve months of Incidental Take Permit for		particular.		the implementation of this effort would come from either the water		
nd indirect  Date the proposed CDFG Section		***************************************		line or water storage trucks.		
to the will acquire compensatory lands at a ground 3:1 ratio within twelve months of		Direct and indirect	BIO-8:	Under the proposed CDFG Section	Prior to any ground	CDFG
3:1 ratio within twelve months of		impacts to the Moiave ground		2001 perinit, the Project Applicant will acquire compensatory lands at a	disturbing activities, CDFG will issue an	
		squirrel.		3:1 ratio within twelve months of	Incidental Take Permit for	

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RESOURCE	IMPACTS	MII	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
			Project site. The Project Applicant will acquire a maximum 40 acres (16 ha) of offsite lands suitable for Mohave ground squirrel, and will provide funding to CDFG for implementation and enhancement activities for habitat acquired, and to perform long-term management of the acquired habitat in perpetuity for the Mohave ground squirrel. The location and conservation management of the identified compensatory lands shall be approved by the California Department of Fish and Game (CDFG) pursuant to Section 2081 of the California Fish and Game Code.	with Deep Rose on the acquisition of an appropriate amount of off-site compensation lands for the Mojave ground squirrel.	
Biological Resources	Overall impacts to biological resources.	BIO-9:	A brief Worker Environmental Awareness Program (WEAP) will be implemented for construction and drilling crews prior to the commencement of project activities. Training materials and briefings will include but not be limited to, discussion of the Federal and State ESAs, the consequences of noncompliance with these acts, identification and values of wildlife and natural plant communities, hazardous substance spill prevention and containment measures, and review of all required and review of all required and	The EM would verify that mitigation is followed.	Environmental Monitor
Cultural Resources	Impacts to potentially significant	CUL-1:	If the evaluation program determines that one or more of the	BLM will verify Deep Rose's compliance with	ВГМ

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RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
	archaeological resources	sites are eligible for inclusion in the National Register, a treatment plan will be developed by Deep Rose and BLM and/or the California State Lands Commission (SLC) (depending on the site's location) in consultation with the State Historic Preservation Office (SHPO), and will be implemented prior to the start of construction.	development and implementation of an approved treatment plan for cultural resources.	
Cultural Resources	Impacts to potentially significant archaeological resources		BLM and DOGGR would verify that mitigation is followed.	Environmental Monitor, DOGGR, and BLM
		CUL-3: In the unlikely event that personnel discover human remains, all work in the vicinity of the discovery would be stopped and the BLM AO notified immediately. The BLM AO would then notify the Inyo County Coroner, the SHPO and local Native American tribal representatives.	BLM would verify that mitigation is followed	ВГМ

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RESPONSIBLE ENTITY	Monitor	that Environmental Monitor	that Environmental Monitor	GBUAPCD
MONITORING MEASURES	mitigation is followed.	The EM would verify that mitigation is followed.	The EM would verify that mitigation is followed.	Verify with the GBUAPCD that BACT control measures have been implemented to reduce exhaust emissions from the drill rig.
MITIGATION MEASURES	and vendors would be required to sign an acknowledgement that they have been apprised of the regulations prohibiting the illegal collection of artifacts or disturbance of archaeological sites, and of the mitigation measures contained herein. Deep Rose will retain copies of these signed acknowledgments until completion of the project.		Well pad and sump construction would be accomplished in as short a time as possible in order to reduce fugitive dust created by construction. If traffic-induced dust becomes a problem, road watering would be increased and/or workers would be required to further coordinate trips and carpools.	If exhaust emissions of oxides of nitrogen from the drilling rig exceeds 250 lbs/day (GBUAPCD Rule 209A), the drilling contractor would be required to use BACT control measures, which may include one or more of the following options:  Retard timing by 4 degrees of standard
M		AIR-1:	AIR-2:	AIR-3:
IMPACTS			Impacts from fugitive dust	Impacts from NOx emissions
RESOURCE			Air Quality	

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RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING MEASURES	RESPONSIBLE ENTITY
Air Ouality		Meet applicable EPA/CARB     Off Road Compression Ignition     Engine Air Pollutant     Emission Standards,     BACT selective catalytic     reduction devices, or     Other BACT control measures     as proposed by the drilling     contractor and acceptable to     GBUAPCD.  AIR-4: The contractor will be allowed to	The GBUAPCD will	GRIIAPCD
	Impacts from H <sub>2</sub> S		verify that Deep Rose and/or the drilling contractor has submitted an H2S abatement plan to the Board prior to the commencement of drilling activities.	GDAVCD
Visual Resources	None	No Additional Mitigation Measures are Recommended		
Noise	Increases in noise associated with well drilling, testing, and	NOI-1: Well flow testing would be through a well field silencer.	A field inspection by an Inyo County representative during well	Inyo County

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RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING	RESPONSIBLE
	monitoring		MEASURES	ENIIIY
	inomination.		tiow testing would verify	
			the use of a well field	
		NOI-2: Workers would be provided with	Periodic field inspections	CAT /OSHA
		proper ear protection and be	by OSHA representatives	
		required to use it during	would insure compliance	
		construction, drilling, and well	with all project related	
		- 1	safety measures.	
Noise	Increases in noise	NOI-3: All equipment will be equipped with	A field inspection by an	Invo County
	associated with well	manufacture's standard noise	Inyo County	
	drilling, testing, and	control devices (i.e. mufflers,	representative would	
	monitoring.	acoustical lagging, and/or engine	verify compliance with	
		enclosures), which will normally	recommended noise	
		achieve compliance with the	limits.	
_		recommended noise limits in most		
		areas.		
		NOI-4: If blasting becomes necessary,	The EM would verify that	Environmental
		efforts will be made to restrict the	mitigation is followed.	Monitor
		peak overpressures to less than 120	· · · · · ·	
		dB at the source to minimize effects		
		to surrounding areas.		
Recreation	None	No Additional Mitigation Measures are		
		HAZ-1: The contractor would provide the	Danicdie Geld in	7.1.00/ 1.40
		aris contractor would provide the	renodic neid inspections	CAL/OSHA
		equipment and necessary safety	by OSHA representatives	
		equipment to miniment protective	would insure compilance	
Hozardone	Dotontial based to	equipinent to minimize worker	with all project related	
Mazaruous	r Otential Hazard to		safety measures.	
Materials and	persons from the	HAZ-2: During construction and upon	Periodic field inspections	CAL/OSHA
Health & Safety	improper nanding	commencement of drilling	by OSHA representatives	
	and use of nazardous	operations, the contractor will have	would insure compliance	
	Substances	chemical or hazardous substance	with all project related	
		inventory for all such items that may	safety measures.	
		be at the site. The contractor will		
		institute a Hazard Communication		

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ING RESPONSIBLE ES ENTITY	·	ill verify LRWQCB as 2 plan ement trivities.	pections CAL/OSHA ntatives ppliance
MONITORING MEASURES		The LRWQCB will verify that Deep Rose has submitted a SPCC plan prior to commencement of construction activities.	Periodic field inspections by OSHA representatives would insure compliance
MITIGATION MEASURES	Program (HCP) for their employees and will require subcontractor programs in accordance with OSHA 29 CFR 1910.1200. These programs are designed to educate and protect the employees and subcontractors with respect to any chemicals or hazardous substances that may be present in the work place. It will be required that as every chemical or hazardous imaterial is brought on location, a Material Safety Data Sheet (MSDS) will accompany that material and will become part of the file kept at the field office as required by 29 CFR 1910.1200. All employees will receive the proper training in storage, handling, and disposal of hazardous substances.		HAZ-4: Hydrogen sulfide (H <sub>2</sub> S) monitors and emergency escape equipment would be available at the drilling rig
IMPACTS	Potential hazard to persons from the improper handling and use of hazardous substances		
RESOURCE	Hazardous Materials and Health & Safety		

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RESOURCE	IMPACTS	MITIGATION MEASURES	MONITORING	RESPONSIBLE
		CONTRACTOR OF THE PROPERTY OF	MEASURES	ENTITY
		instructed in the correct usage of this equipment.		
		HAZ-5: All project activities would be	Inyo County would	Inyo County
		conducted in accordance with all	review OSHA logs and	
		applicable CAL/OSHA regulations.		
			compliance with OSHA	
	A potential impact on	TRA-1: Coordinate project construction	The Invo County of	1
	localized traffic slow-			Inyo County
	downs or congestion	prainting scrictures to avoid ourer		
	downs of congestion	possible permitted uses or to reduce		
	along U.S. 395 and	the potential for localized traffic	ensure that there are no	
	Coso/Gill Station	slow-downs or congestion.	project related conflicts to	
	IXOZIQ.		existing traffic levels.	
		TRA-2: Proper road signs would be	The Inyo County of	Inyo County
		prominently placed near the	Public Works Department	•
{		intersection of U.S. 395 and	representative would meet	
Transportation		Coso/Gill Station Road and the	with Deep Rose to	
	Increased notential	intersection of Coso/Gill Station and		
	for hazards to	Pumice Mine roads or other	road sign(s).	
	motorists due to a	locations to encourage motorists to		
	localized increase in	exercise caution when approaching	gr	
	traffic.	these areas. In the event that		
		signing does not meet safety		·
		standards, appropriate modifications	suo	
		to intersections would be considered	red	
		in order to improve site visibility.	٠	
Town Tree	7.0	7 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -		
Land Use and	None	No Additional Mitigation Measures are		
Socioeconomics		Kecommended		

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