APPENDIX 2
MITIGATION, MONITORING AND REPORTING PROGRAM
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Adopted Project Design Measures and Mitigation Measures

The table that follows presents a compilation of the Project Design Measures and Mitigation Measures adopted by the Bureau of Land Management (BLM), Bishop Field Office, in cooperation with the United States Forest Service (USFS), Inyo National Forest, and the Great Basin Unified Air Pollution Control District (GBUAPCD) for the Casa Diablo IV Geothermal Development Project (CD-IV Project). The table provides a single comprehensive list of the measures that will be implemented to avoid or reduce impacts of the CD-IV Project on the human environment, the timing for their implementation, and the related monitoring and reporting requirements.

ORNI 50, LLC is responsible for adhering to, and implementing, the adopted Project Design Measures and Mitigation Measures that will govern both construction and future operation of the CD-IV Project. All approvals and permits required by ORNI 50, LLC for implementation of the CD-IV Project shall be submitted to the BLM, Inyo National Forest, GBUAPCD, and/or other appropriate regulatory authority as denoted in the table below prior to commencing the activity for which the approval or permit is required.

The BLM will continue to act as the lead federal agency for the CD-IV Project. The Inyo National Forest will continue to act as a cooperating federal agency. The GBUAPCD will continue to act as the lead state agency for the project.

The cooperating agencies are responsible for ensuring compliance with the provisions of this Mitigation, Monitoring and Reporting Program and have the primary responsibility for ensuring conformance to, and implementation of, the adopted Project Design Measures and Mitigation Measures as outlined in the table. In instances where the BLM is identified as the agency responsible for monitoring compliance for measures designed to avoid or reduce impacts to resources for which the Inyo National Forest is the responsible surface management agency, the BLM will coordinate compliance monitoring with the Forest Service.

The BLM, Inyo National Forest, and GBUAPCD may authorize qualified individuals and agencies to perform monitoring activities as deemed necessary. The agencies retain the authority to halt any activity associated with the CD-IV Project if the activity is determined to be a deviation from the approved project or the adopted Project Design Measures and Mitigation Measures listed herein.
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MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

Adopted Project Design Measures and Mitigation Measures

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<th>Implementing Actions</th>
<th>Monitoring/Reporting Requirements</th>
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<td><strong>Air Resources</strong></td>
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<tr>
<td>PDM AQ-1: ORNI 50, LLC will apply water during the construction and utilization of pads and access roads as necessary to control dust. Dust shall not be discharged into the air for a period or periods aggregating more than three minutes in any one-hour that is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
<td>GBUAPCD to monitor compliance. During construction.</td>
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<td>PDM AQ-2: ORNI 50, LLC shall comply with any requirements prescribed by the Great Basin Unified Air Pollution Control District (GBUAPCD) concerning emissions of air pollutants from construction engines or hydrogen sulfide from operating geothermal wells. The drilling rigs shall be registered in the California Air Resources Board (CARB) Portable Engine Registration Program.</td>
<td>ORNI 50, LLC and its contractors to implement and comply with prescribed construction and operation air emissions reduction procedures, and register drilling rigs with the CARB Portable Engine Registration Program.</td>
<td>GBUAPCD to review and approve registered drilling rigs with CARB. Prior to construction.</td>
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<td>PDM AQ-3: ORNI 50, LLC shall utilize best available equipment and design to minimize emissions of n-pentane.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
<td>GBUAPCD to review and approve a summary of proposed equipment and design. At least 30 days prior to start of construction.</td>
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<td><strong>GBUAPCD Requirements for controlling emissions.</strong></td>
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<td>PDM AQ-4: ORNI 50, LLC shall apply for an air permit to construct and operate the wells and power plant. The project shall conform to GBUAPCD requirements for controlling emissions.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
<td>GBUAPCD to monitor compliance. At least 30 days prior to start of construction.</td>
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<td><strong>Mitigation Measure AQ-1:</strong> ORNI 50, LLC shall develop and implement a plan that demonstrates that the mobile off-road equipment (more than 50 horsepower) to be used for the CD-IV Project (i.e., owned, leased, and subcontractor vehicles) shall achieve a project wide fleet-average 20 percent NOx reduction compared to the most recent CARB fleet average. The plan shall be approved by the GBUAPCD prior to the commencement of construction activities. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
<td>GBUAPCD to review and approve submitted plan. Submit plan to GBUAPCD at least 30 days prior to the start of construction, and during construction if modified.</td>
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<td><strong>Mitigation Measure AQ-2:</strong> ORNI 50, LLC shall require that all drill rig engines meet either USEPA and CARB Tier 2 or higher emissions standards for off-road engines. Prior to commencement of drilling, ORNI 50, LLC shall provide documentation to the GBUAPCD that demonstrates that each drill rig shall be equipped with Tier 2 and Tier 3 engines.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
<td>GBUAPCD to review and approve proposed drill rigs. Submit documentation to the GBUAPCD at least 30 days prior to the start of drilling.</td>
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<td><strong>Mitigation Measure AQ-3:</strong> ORNI 50, LLC shall develop a Fugitive Dust Control Plan to be implemented during construction of the CD-IV Project. The plan shall be submitted to the GBUAPCD for review and approval prior to the commencement of construction activities. The plan shall include, but not be limited to, the following dust control measures:</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
<td>GBUAPCD to review and approve fugitive dust control plan. Submit plan to the GBUAPCD at least 30 days prior to the start of construction and during construction if modified.</td>
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<td>• All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized to control dust emissions using water.</td>
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<td>• All ground disturbance, including land clearing, grubbing, scraping, excavation, grading, and cut &amp; fill activities shall effectively control fugitive dust emissions by utilizing application of water or by presoaking.</td>
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<td>• Limit traffic speed on unpaved access roads to 15 miles per hour (mph) and post visible speed limit signs at construction site entrances.</td>
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<td>• Suspend excavation and grading activity when gusts produce wind speeds exceeding 20 mph.</td>
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<td>• Reduce land disturbance activities as much as possible so that natural, stable soil conditions remain.</td>
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<td>• The plan shall include provisions for monitoring fugitive dust based on the requirements of PDM AQ-1, and if the requirements identified in PDM AQ-1 are exceeded, construction activities shall cease until it can be determined that the requirements can be achieved.</td>
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<td><strong>Mitigation Measure AQ-4:</strong> ORNI 50, LLC shall monitor hydrogen sulfide (H2S) concentrations during all well drilling and testing at GBUAPCD-approved locations for each well location. If the well H2S emissions exceed 2.5 kg/hr or the State’s H2S ambient air quality standard for one hour is exceeded, further venting shall be curtailed until an H2S Abatement Plan, approved by the GBUAPCD, is implemented to reduce H2S well emissions below 2.5 kg/hr and the ambient concentrations below the State standard of 0.03 parts per million. The plan shall include (1) a description of the abatement technology, the degree of control expected from such technology, and the test data indicating that such degree of control can be expected in a geothermal well application; and (2) air quality analysis showing that the use of such abatement technology shall not result in any violation of the State ambient air quality standard for H2S.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
<td>GBUAPCD to review H2S concentrations and an H2S abatement plan. Submit monthly monitoring reports to the GBUAPCD. If H2S concentrations exceed 2.5 kg/hr or the State’s H2S ambient air quality standard for one hour, the GBUAPCD must be notified within 24 hours. If an H2S abatement plan is required, construction must halt until approved by the GBUAPCD.</td>
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Air Resources (cont.)

Mitigation Measure AO-5: ORNI 50, LLC shall prepare and implement an Emission Management Plan for review and approval by the GBUAPCD Air Pollution Control Officer, which shall contain the following:

- A description of the method to determine the daily n-pentane volume in the plant.
- An explanation of how to calculate n-pentane loss rates over a given period.
- An action plan for detecting and reporting breakdown events under GBUAPCD Rule 403.B, when n-pentane leaks emit more than 410 pounds per day.
- An action plan for repairing leaks associated with breakdown events. A maintenance plan for routine monitoring and prevention of n-pentane leaks.
- A format for quarterly reports on n-pentane losses and purchases. The Emissions Management Plan shall be updated as necessary in order to ensure compliance with federal, state, and/or district rules and to incorporate management plan improvements if necessary.

Mitigation Measure AO-6: ORNI 50, LLC shall obtain a portable Volatile Organic Compound (VOC) leak detector capable of meeting the performance specifications described in USEPA's Source Test Reference Method 21. This instrument shall be properly maintained, calibrated, and made readily available at all times on the project site. The instrument shall be used at least on a monthly basis to assist ORNI 50, LLC personnel in detecting n-pentane leaks from all flanges, valves, pump seals, safety relief valves, n-pentane accumulator vessels, and turbine gland seals. Whenever a leak is detected that is greater than 10,000 parts per million by volume (ppmv) from any aforementioned equipment, ORNI 50, LLC shall initiate repairs as soon as practical. Once a leak is discovered, ORNI 50, LLC shall tag and log its location, record the leak concentration, record the date, and record the dates of each repair attempt. A report that includes the six-month average daily emission calculations and n-pentane purchases shall be submitted electronically to the GBUAPCD within 30 days from the end of each calendar quarter. A summary record of the leak repairs made shall also be submitted to the GBUAPCD when reporting n-pentane losses.

GBUAPCD to review and approve submitted plan. Submit plan to the GBUAPCD at least 30 days prior to the start of construction and during construction if modified.

Biological Resources

PDM BIO-1: A qualified wildlife biologist shall walk the pipeline route once each year for the first three years following completion of construction to survey for any signs that the pipeline is impeding wildlife movement. If such evidence is found, the USFS may require ORNI 50, LLC to clear one or more areas under the pipeline of at least 16 inches height, or a height sufficient to allow wildlife to pass under the pipeline, at the points where movement is impeded.

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PDM BIO-2: After construction is complete, erosion control measures including revegetation and periodic maintenance activities shall be implemented. Disturbed areas that will not be used after construction shall be revegetated with the proper seed mixture and planting procedures prescribed by the USFS. Any topsoil enriched in organic material stockpiled from previously disturbed areas (see GED-1) may be applied to enhance areas to be reclaimed by revegetation.

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PDM BIO-3: During construction, prior to entering and upon exiting the project area, all trucks and construction equipment that will operate off of previously existing roads shall be washed to remove soil and plant parts. A central washing facility shall be provided for this purpose, either at the ORNI 50, LLC equipment area at Casa Diablo on private land, or at a location approved by the authorized officer.

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PDM BIO-4: All materials used in erosion control and/or rehabilitation efforts (e.g. straw bales, seeds, etc.) on the project shall be certified as being free of noxious weed materials.

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PDM BIO-5: New non-native species introduced as a result of the project shall be eradicated (i.e., 0 percent cover). Where this standard is not met, appropriate weed control measures shall be implemented in order to comply with the standard for a period of three years following project completion.

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PDM BIO-6: With the exception of cheatgrass, all non-native weed species already present in the project area may account for no more than 5 percent total of the relative cover of the disturbed areas, including roadsides at the end of the 3-year evaluation period following completion of revegetation measures. Weed control shall be implemented immediately following implementation of the project, and throughout the project life to meet this standard.

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PDM BIO-7: Cheatgrass is largely absent from the forested portions of the project area. In order to maintain this condition, cheatgrass shall be removed from all areas where ground disturbance occurs west of drill sites 56-25, 57-25 or 58-25. Appropriate weed control measures shall be implemented as necessary, in order to prevent the invasion and spread of cheatgrass, throughout the life of the project, and for a period of three years following project completion.

ORNI 50, LLC and its contractors to implement measure as defined. ORNI 50, LLC and its contractors to implement measure as defined. ORNI 50, LLC and its contractors to implement measure as defined. ORNI 50, LLC and its contractors to implement measure as defined. ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance in coordination with the USFS. BLM to monitor compliance in coordination with the USFS. BLM to monitor compliance in coordination with the USFS. BLM to monitor compliance in coordination with the USFS. BLM to monitor compliance in coordination with the USFS. Throughout the life of the project and for three years following project completion (decommissioning).
MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

Biological Resources (cont.)

Mitigation Measure VEG-1: ORNI 50, LLC shall undertake the following measures to manage the construction site and related facilities in a manner to avoid or minimize impacts to vegetation resources:

1. Limit Disturbance Areas. The boundaries of all disturbed areas (including staging areas, access roads, and sites for temporary placement of spoils) shall be delineated with stakes and flagging prior to construction activities. Spoils and topsoil shall be stockpiled in disturbed areas lacking native vegetation that do not provide habitat for special-status species. The stockpiles shall not be placed in areas with existing weed populations. All disturbances, CD-IV Project vehicles and equipment shall be confined to the flagged areas. All personal vehicles shall be parked off-site or at existing MPLP facilities. All above ground pipelines and transmission lines shall be installed using low pressure tracked equipment to minimize impacts on vegetation. Understory vegetation and surfaces may be trapped during pipeline and transmission line installation but not removed. All Jeffrey pine trees in the installation routes outside of the footprint of the power plant site and the well pad sites shall be preserved where feasible. For construction activities outside of the plant site (transmission line, pipeline alignments, well pad sites) access roads, passing sites, and storage and parking areas shall be designed, installed, and maintained with the goal of minimizing impacts to native plant communities and sensitive biological resources.

2. Minimize Road Impacts. New and existing roads that are planned for construction, widening, or other improvements shall not extend beyond the flagged impact area as described above. All vehicles passing or turning around shall do so within the planned impact area or in previously disturbed areas. Where new access is required outside of existing roads or the construction zone, the route shall be clearly marked (i.e., flagged and/or staked) prior to the onset of construction.

3. Implement Erosion Control Measures. Standard erosion control measures shall be implemented for all phases of construction and operation where sediment run-off from exposed slopes threatens to enter 'Waters of the State'. All disturbed soils and roads within the project site shall be stabilized to reduce erosion potential, both during and following construction. Areas of disturbed soils (access and staging areas) that slope toward a drainage, shall be stabilized to reduce erosion potential. Water used for dust suppression purposes may not come from Casa Diablo power plant geothermal injection fluids.

4. Revegetation of Temporarily Disturbed Areas. Per PDM BIO-2, ORNI 50, LLC shall prepare and implement a Revegetation Plan to restore all areas subject to temporary disturbance to pre-project grade and conditions. The Revegetation Plan may not be implemented until it is approved by an Inyo National Forest botanist who is familiar with the project environment and the District Ranger. Temporarily disturbed areas within the project area include, but are not limited to: the transmission line corridor, construction staging areas for well pad sites, and temporary access roads. The Revegetation Plan shall include a description of topsoil salvage and seeding techniques and a monitoring and reporting plan. The following success standards shall be met at the end of the third growing season following seed application.
   a. Success standards for revegetation in the Jeffrey pine forest are as follows:
      i. At least 1 tree, 1 shrub, and 6 perennial native grasses and/or forbs per 4 square meters shall be established on site.
      ii. Perennial grasses shall account for at least 10 percent of the relative cover.
      iii. All non-native weed species that are already present in the area may account for no more than 5 percent total of the relative cover at the end of a three year evaluation period. New non-native species introduced as a result of the project shall be eradicated (i.e., 0 percent cover).
   b. Success standards for revegetation in the Sagebrush Scrub are as follows:
      i. At least 3 shrubs and 8 perennial native grasses and/or forbs per 4 square meters shall be established on site.
      ii. Perennial grasses shall account for at least 10 percent of the relative cover.
      iii. All non-native weed species that are already present in the area may account for no more than 5 percent total of the relative cover at the end of a three year evaluation period. New non-native species introduced as a result of the project shall be eradicated (i.e., 0 percent cover).

5. Landscaping. Any vegetation planted for landscaping or visual shielding purposes shall be reviewed by USFS personnel prior to installation.

6. Grazing. The USFS shall ensure that grazing in the Sherwin/Deadman Sheep and Goat Allotment avoids active or revegetation monitoring areas in Basalt Canyon and Upper Basalt Canyon, as required by the Revegetation Plan (see Mitigation Measure VEG 1.4, above). Avoid Grazing in Revegetation Areas.
### Biological Resources (cont.)

**Mitigation Measure VEG-2: Weed Management Plan** ORNI 50, LLC shall implement a Weed Management Plan that meets the approval of the USFS. The objective of the Weed Management Plan shall be to prevent the introduction of any new weeds and the spread of existing weeds as a result of project construction, operation, and decommissioning. The Weed Management Plan shall include a minimum of the following information: specific weed management objectives and measures for each target non-native weed species; baseline conditions; a map of existing weed populations; weed risk assessment and measures to prevent the introduction and spread of weeds; monitoring and surveying methods; and reporting requirements. The Weed Management Plan shall include specific implementation requirements for each phase of the project.

The plan shall be consistent with USFS practices and shall be implemented by ORNI 50, LLC to reduce the potential for the introduction of invasive species during construction, operation and maintenance, and decommissioning of the CD-IV Project. The draft plan shall be reviewed and approved by the USFS. The following measures are required in the plan and shall be implemented by ORNI 50, LLC to monitor and control invasive species:

1. **Preventative Measures During Construction.**

   **Equipment Cleaning:** To prevent the spread of weeds into new habitats, prior to entering the project work areas, construction equipment and personal vehicles shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed seeds and the tracks, feet, tires, and undercarriage shall be carefully washed, with special attention paid to axles, frame, cross members, motor mounts, underboots, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g. pickup trucks) and vehicles from different areas of the project that frequently enter and exit the site shall be inspected and washed on an as-needed basis. A vehicle log shall be maintained at the washing facility to document vehicle cleaning.
   - a. All vehicles shall be washed off-site when possible. Should off-site washing prove infeasible, an on-site cleaning station shall be set up to clean equipment before it enters the work area. Either high-pressure water or air shall be used to clean equipment and the cleaning site shall be situated away from any sensitive biological resources. If possible, water used to wash vehicles and equipment shall be collected and re-used. Before re-using the vehicle wash water, any vegetative matter or soil shall be removed.
   - b. Site Soil Management: Ground disturbance shall be limited to the minimum necessary for construction activities, using dust suppressants to minimize the spread of seeds. Disturbed vegetation and topsoil shall be re-deposited at or near the removal area to eliminate the transport of soil-borne noxious weed seeds, roots, or rhizomes. Areas of topsoil removal shall be surveyed for weeds pre-project. If weeds are present, the topsoil may not be re-used for revegetation purposes. Use of BLM-approved dust suppressants (e.g. water) shall be minimized on the site as much as possible, but shall be used during construction to minimize the spread of airborne weed seeds, especially during very windy days.
   - c. Weed-free Products: Any use of hay or straw bales on the project site shall be limited to certified weed-free material. Other products such as gravel, mulch, and soil may also carry weeds and these products, too, shall be certified weed-free. If needed, mulch shall be made from the local, on-site native vegetation cleared from the project area. Soil may not be imported onto the project site from off-site sources.

2. **Containment and Control Measures.**

   When project monitoring (see below) indicates that invasive species are spreading, invasive species shall be removed using mechanical or manual removal methods. During eradication activities, care shall be taken to have the least effect on native plant species. Chemical control is not included as part of these containment and control measures because site specific information on target weed species are not known at this time.

3. **Monitoring.** Baseline weed conditions shall be assessed during the pre-construction phase of the CD-IV Project, during pre-construction surveys and staking and flagging of construction areas. A stratified random sampling technique shall be used to identify and count the extent of weeds on the site.

   Monitoring shall take place each year during construction, and annually for the lifespan of the project following the completion of construction. The purpose of annual monitoring will be to determine if weed populations identified during baseline surveys have increased in density or are spreading as a result of the CD-IV Project. With the exception of cheatgrass, all non-native weed species already present in the project area may account for no more than 5 percent total of the relative cover of the disturbed areas, including roadskides. Control methods shall be implemented when measurable weed increases, or visually verified increases occur that span two or more consecutive years of monitoring results collected at the end of the growing season.

   General management and monitoring of the project area shall be conducted by designated site personnel each year during both the germinating and early growing season (November through April) to eliminate new weed individuals prior to seed set. Throughout construction and long-term monitoring, personnel shall be trained to identify weedy and native species and work with a trained vegetation monitor to determine where elimination is necessary.

4. **Reporting.** Results of monitoring and management efforts shall be included in annual reports. Copies of these reports shall be kept on file at the site. Copies of each annual report shall be sent to the BLM and USFS for review and comment. BLM and USFS shall use the results of these reports to determine if any additional monitoring or control measures are necessary.

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**ORNI 50, LLC and its contractors to prepare and implement a Weed Management Plan.** USFS and BLM to review and approve the Weed Management Plan. BLM to monitor compliance in coordination with the USFS. ORNI 50, LLC to submit plan to the USFS and BLM at least 30 days prior to the start of construction and during construction if modified. Annual reports shall be submitted to the USFS and BLM.
Mitigation Measure VEG-2 (cont.): Weed Management Plan

5. Success Criteria. Weed control shall be ongoing on the project site for the life of the CD-IV Project, but plan success will be determined by BLM and USFS after three years of operations monitoring through the reporting and review process. Success criteria shall be defined as the following:

a. Non-native weed species that are already present in the area may account for no more than 5 percent total of the relative cover at the end of a three year evaluation period.

b. New non-native species introduced as a result of the project shall be eradicated (i.e. 0 percent cover).

Mitigation Measure VEG-3: This mitigation measure shall modify PDMs BIO-5, BIO-6, and BIO-7: All weed monitoring and weed control remediation efforts shall commence at the start of construction activities and shall continue for the duration of the permit.

Mitigation Measure WIL-1: Avoid Active Nesting Season. To avoid and minimize impacts to tree and shrub nesting species, the following measures shall be implemented by ORNI 50, LLC according to the timelines shown below:

1. If feasible, conduct all tree and shrub removal and grading activities during the non-breeding season (generally September 1 through January 31).

2. If grading and tree removal activities are scheduled to occur during the breeding and nesting season (February 1 through August 31), pre-construction surveys shall be performed prior to the start of project activities.

Conduct Pre-construction Nesting Bird Surveys. If construction, grading or other project activities are scheduled during the nesting season (February 1 to August 31), pre-construction surveys shall be conducted prior to the initiation of construction by a qualified wildlife biologist to identify active hawk nests within 1/2-mile of proposed construction activities and nests of other species within 500 feet of proposed construction activities. The surveys shall be conducted no less than 14 days and no more than 30 days prior to the beginning of each phase of construction. The results of the survey shall be emailed to the BLM, USFS, CDFW and USFWS at least three days prior to construction. Surveys shall be conducted by a qualified biologist in accordance with the following protocols:

1. Surveys for northern goshawk shall include at least two preconstruction surveys (separated by at least two weeks). Surveys must include both stand search and broadcast acoustical survey methodologies as described in the 2000 USDA Forest Service Protocol for the Northern Goshawk in the Pacific Southwest Region.

2. Surveys for other migratory bird species shall take place no less than 14 days and no more than 30 days prior to the beginning of each phase of construction that would be located within 500 feet of suitable nesting habitat.

If the pre-construction surveys do not identify any nesting raptors or other nesting migratory bird species within areas potentially affected by construction activities, no further mitigation will be required. If the pre-construction surveys do identify nesting raptors or other nesting bird species within areas that may be affected by site construction, the following measures shall be implemented:

Avoid Active Bird Nest Sites. Should active nest sites be discovered within areas that may be affected by construction activities, additional measures shall be implemented as described below, prior to the initiation of construction:

Northern Goshawk and other Migratory Birds: If active nests are found, project-related construction impacts shall be avoided by establishment of appropriate no-work buffers to limit project-related construction activities near the nest site. The size of the no-work buffer zone shall be determined in consultation with the BLM, USFS, CDFW and USFWS although a 500-foot buffer may be used initially prior to agency consultation. For northern goshawk nests, the buffer shall be 1/4 mile. The no-work buffer zone shall be delineated by highly visible temporary construction fencing. In consultation with BLM, USFS, CDFW and USFWS, monitoring of nest activity by a qualified biologist may be required if the project-related construction activity has potential to adversely affect the nest or nesting behavior of the bird. No project-related construction activity shall commence within the no-work buffer area until a qualified biologist and USFS, CDFW and USFWS confirm that the nest is no longer active.

Mitigation Measure WIL-2: Water which may accumulate in geothermal well site basins from precipitation shall be removed to a standing depth of 2 inches or less from the respective basins on a daily basis or as soon as operationally feasible; and liquids deposited into the basins shall either be removed daily to a standing depth of 2 inches or less, or the basins shall be made wildlife-escapeable by creating earthen ramps at slopes of 1:3 or less at intervals of 100 feet apart or less around the perimeter of the standing depth of the liquid stored in the basin. The basins shall be monitored during well drilling to determine if these measures are effective, and monitored during spring months to ensure that water does not accumulate as snow melts. If monitoring determines that these measures are ineffective in preventing wildlife from drowning in the basins, an alternative deterrent or escape structure such as netting shall be implemented. Alternatives for providing equally effective measures which would allow wildlife to escape unharmed from the well site basins may be authorized subject to USFS, USFWS and CDFW approval. If indications of a hazardous materials release such as oils or surface films are observed in basins, netting or screening shall be used when basins are unstaffed to prevent access by birds and other wildlife.

Mitigation Measure BIO-4: Water basins shall either be removed daily to a standing depth of 2 inches or less, or the basins shall be made wildlife-escapeable by creating earthen ramps at slopes of 1:3 or less at intervals of 100 feet apart or less around the perimeter of the standing depth of the liquid stored in the basin. The basins shall be monitored during well drilling to determine if these measures are effective, and monitored during spring months to ensure that water does not accumulate as snow melts. If monitoring determines that these measures are ineffective in preventing wildlife from drowning in the basins, an alternative deterrent or escape structure such as netting shall be implemented. Alternatives for providing equally effective measures which would allow wildlife to escape unharmed from the well site basins may be authorized subject to USFS, USFWS and CDFW approval. If indications of a hazardous materials release such as oils or surface films are observed in basins, netting or screening shall be used when basins are unstaffed to prevent access by birds and other wildlife.
Biological Resources (cont.)

Mitigation Measure WIL-3: Within the Jeffrey pine forest habitat within the project area, retain as many snags, downed logs, coarse woody debris and brush piles as possible, and use cleared trees, woody vegetation, and brush materials to retain existing habitat and provide new Sierra marten hunting and denning opportunities.

ORN1 50, LLC and its contractors to implement measure as defined.

ORNI 50, LLC to summarize retention of Jeffrey pine forest habitat and reuse of woody material in a document for submittal to USFS.

During construction.

Mitigation Measure WIL-4: A new deer crossing shall be constructed over the proposed pipeline running south of the power plant site between the existing substation and the existing MP1 power plant to enhance mule deer and other wildlife movement through the project area. The new crossing shall be designed with input from the CDFW but will resemble the existing crossing at the SCE easement.

ORN1 50, LLC and its contractors to implement measure as defined.

ORNI 50, LLC to submit crossing design to CDFW for input. USFS to monitor compliance in cooperation with CDFW.

Prior to and during construction.

Mitigation Measure WIL-5: The proposed pipelines running parallel to the existing Basalt Canyon pipeline shall be installed underground in alignment with the existing underground sections in order to provide a clear visual corridor for migrating deer. The underground sections shall be a minimum of 30 feet in length. In most cases these segments occur at existing roads, which mule deer habitually use for movement. Segments that are parallel to the existing Basalt Canyon pipeline in areas where there are currently no underground segments shall be installed underground at a prescribed frequency. These underground segments shall be located in areas with obstructed view to avoid disturbing or stratifying herd movement. In addition to these underground segments, underground pipeline segments shall be installed at high frequency through economically valuable mule deer habitat. Underground segments shall be at least 15 feet deep. If used, overhead segments shall be no closer than 50 feet to the pipeline. The underground segments shall be at least 25 feet in length. Only where it is not feasible, shall the underground segments be installed at a height of 50 feet.

ORN1 50, LLC and its contractors to implement measure as defined.

BLM and USFS to review and approve pipeline plans to ensure compliance with this measure. BLM and USFS to monitor compliance.

Prior to and during construction.

Mitigation Measure WIL-6: ORNI 50, LLC shall prepare and implement a Migratory Deer Monitoring Plan that meets the approval of BLM and USFS. The objective of the Migratory Deer Monitoring Plan shall be to monitor the pipeline routes for evidence of movement corridors not currently identified. The migratory deer movement monitoring plan shall be designed to meet the methodology used for the deer track crossing studies performed in 2011 (Paulus 2011a; 2012a; 2012b). The monitoring plan shall include an assessment of the number of domestic deer on the property, the effects of the proposed pipeline on deer movement, and the impact of the proposed pipeline on the migratory movement of deer. The monitoring plan shall also include an assessment of the number of wildlife movements on the property, the effects of the proposed pipeline on wildlife movement, and the impact of the proposed pipeline on the migratory movement of wildlife. The monitoring plan shall also include an assessment of the number of wildlife movements on the property, the effects of the proposed pipeline on wildlife movement, and the impact of the proposed pipeline on the migratory movement of wildlife. The monitoring plan shall also include an assessment of the number of wildlife movements on the property, the effects of the proposed pipeline on wildlife movement, and the impact of the proposed pipeline on the migratory movement of wildlife.

ORN1 50, LLC and its contractors to implement measure as defined.

BLM and USFS shall review and approve Migratory Deer Monitoring Plan. BLM and USFS to monitor compliance.

At least 30 days prior to construction.

Mitigation Measure WIL-7: The following measures are required to protect mule deer and general wildlife:

a) No lighting, noise, or odor-generating construction activities on project linear corridors shall be conducted after 10:00 PM, and all temporary lighting, noise, or odor generating shall be turned off by 11:00 PM. All temporary lighting, noise, or odor generating shall be removed from site by 6:00 AM. Light fixtures shall be designed to reduce the intensity of light at the ground level. Construction-related activities that may affect wildlife shall be conducted between sunrise and sunset, with the following exceptions: (1) grading on construction sites shall be limited to daylight hours; and (2) construction activities associated with project access and operations shall be limited to daylight hours.

b) To the maximum extent feasible, all noise-generating construction activities on project linear corridors shall be limited to daylight hours.

c) During construction and decommissioning, solid waste materials (trash) shall be stored in containers that are inaccessible to wildlife.

d) Suitably designed, temporary fencing shall be used to protect riparian areas that provide critical habitat for mule deer, coyote, and other wildlife species.

e) A shareable MSA between the existing substation and the existing MP I power plant to enhance mule deer and other wildlife movement through the project area. The new crossing shall be designed with input from the CDFW but will resemble the existing crossing at the SCE easement.

ORN1 50, LLC and its contractors to implement measure as defined.

USFS to review and approve safety lighting and monitor compliance with all safety lighting, noise, and waste requirements. BLM will also monitor during construction.

During construction and operation.

Mitigation Measure WIL-8: Conduct Pre-construction Bat Surveys. If construction, grading or other project-related activities are scheduled during the breeding season of native bat species (April 1 to August 31), pre-construction surveys shall be conducted prior to the initiation of construction by a qualified biologist to determine whether active roosts are present on site or within 50 feet of project activities. Field surveys shall be conducted early in the breeding season before any construction activities begin, when bats are establishing maternity roosts but before pregnant females give birth (April through early May). If no roosting bats are found, then no further mitigation is required. If roosting bats are found, then disturbance of the maternity roosts shall be avoided by halting construction until the end of the breeding season or a qualified bat biologist removes and relocates the roosting bats in consultation with CDFW.

ORN1 50, LLC and its contractors shall ensure the completion of required surveys to CDFW protocol standards.

CDFW to review and approve surveys, if necessary.

Prior to construction.
MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

### Biological Resources (cont.)

**Mitigation Measure WIL-9**: Conform to Avian Power Line Interaction Committee Guidelines. Electric distribution poles or towers being modified or integrated with the project shall be compliant with measures defined by the Avian Power Line Interaction Committee (APLIC).

- ORNI 50, LLC and its contractors shall ensure that APLIC Guidelines are incorporated into construction plans, details, shop drawings and specifications.
- USFS to review and approve all construction plans, details, shop drawings and specifications to ensure compliance.
- Prior to and during construction.

**Mitigation Measure WIL-10**: Prior to commercial production or injection of geothermal resources, the applicant shall develop and implement an Owens Tui Chub Population and Habitat Monitoring Plan and amend the existing Remedial Action Plan. In coordination with the BLM and USFS, CDFW and USFWS will be invited to participate in the development and implementation of the plan. The Population and Habitat Monitoring Plan and amendment to the Remedial Action Plan shall be approved by BLM, CDFW, and USFWS prior to implementation. The plans are intended to identify and quantify potential changes to fish habitat and populations at AB and CD springs and Little Hot Creek Pond. The plans shall include the following measures:
  a. Conduct baseline (year zero) and ongoing fish surveys using CDFW and USFWS approved survey methods in portions of the AB/CD springs, and Little Hot Creek Pond where water quality changes could potentially affect Owens tui chub habitat or populations.
  b. Collect baseline (year zero) benthic macroinvertebrate (BMI) samples at the same sampling sites and dates as the fish surveys described above, and periodically concurrent with fish surveys after the initial collection.
  c. Conduct a baseline (year zero) and periodic stream habitat assessments in accordance with agency-approved survey protocols. These assessments shall include a quantitative evaluation of physical stream characteristics, and aquatic and riparian vegetation.
  d. Incorporate the collected population and habitat data into an analysis and discussion of water quality data collected in AB and CD springs, and Little Hot Creek Pond such as field measurements for air and water temperature, conductivity, dissolved oxygen (concentration and percent saturation), flow, turbidity, and hydrogen ion concentration (pH). Additional parameters may include, but are not limited to, sampling for total suspended solids (TSS), hardness, aluminum, and chromium to be collected, preserved, and sent to a certified analytical laboratory for analysis.
  e. Prepare an annual data report summarizing the current year’s survey and sampling results, including analyses of trends and conditions. A draft report shall be made available for BLM review by December 31 of each year. The summary report shall include an analysis and discussion of water quality data. The report will be provided to CDFW and USFWS for review.
  f. Amend the existing Remedial Action Program to include measures specific to changes in Owens tui chub populations and primary constituent elements, such as aquatic vegetation, water quality, and an adequate insect prey base.

**Climate Change**

**Mitigation Measure GHG-1**: ORNI 50, LLC shall put forth a good-faith effort to obtain and install hermetically sealed circuit breakers and gas insulated switches for all sulfur hexafluoride (SF₆) containing equipment associated with the CD-IV Project.

- ORNI 50, LLC and its contractors to implement measure as defined.
- ORNI 50, LLC to submit a summary of SF₆ containing equipment to GBUAPCD for review and approval. Where hermetically sealed equipment is not proposed include a detailed explanation of why not.
- Prior to and during construction.

**Cultural Resources**

**PDM CUL-1**: All grading and site construction activities shall avoid, to the extent possible, all cultural resource sites identified in the cultural resource survey report prepared for the project area. If identified cultural resource sites cannot be avoided, ORNI 50, LLC shall comply with all requirements of the BLM, USFS and California State Office of Historic Preservation (SHPO) prior to any grading or site construction activities which may affect the cultural resources.

- ORNI 50, LLC and its contractors to implement measure as defined.
- USFS and BLM to monitor compliance.
- Prior to and during construction.

**PDM CUL-2**: If buried cultural deposits are discovered during site construction activities which were not identified in earlier cultural resource surveys for the project, grading and site construction activities in the vicinity of the cultural deposit will be evaluated by the Inyo National Forest archaeologist, or by a cultural resource specialist pursuant to the requirements of Memorandum of Agreement (MOA) with the SHPO.

- ORNI 50, LLC and its contractors to implement measure as defined and to notify the Inyo National Forest and SHPO as required.
- USFS and BLM to monitor compliance.
- During construction.

**PDM CUL-3**: ORNI 50, LLC employees, contractors, and suppliers shall be informed about the sensitivity of the cultural resources in the project area and reminded that all cultural resources are protected and, if uncovered, shall be left in place and reported to the ORNI 50, LLC representative and/or their supervisor.

- ORNI 50, LLC and its contractors to implement measure as defined.
- USFS and BLM to monitor compliance.
- Prior to and during construction.
MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

Cultural Resources (cont.)

Mitigation Measure CUL-1: A Memorandum of Agreement (MOA) shall be prepared and shall detail: 1) procedures to resolve adverse effects under Section 106 of the National Historic Preservation Act; 2) coordination between the CEQA process and Section 106 compliance; 3) procedures for treatment of inadvertent discoveries; 4) procedures for determining treatment and disposition of human remains; 5) compliance monitoring; 6) dispute resolution; 7) development of an Historic Properties Avoidance Plan; and 8) Tribal consultation and participation.

ORNI 50, LLC and its contractors to prepare the MOA. USFS and BLM to review and approve the MOA. At least 90 days prior to construction.

Mitigation Measure CUL-2: On the basis of preliminary National Register eligibility assessments made under the MOA, particularly concerning contributing resources to the Casa Diablo Obsidian Quarry District, the BLM and USFS may require the relocation of project components to avoid or reduce damage to cultural resource values. Where operationally feasible, potentially National Register-eligible resources shall be protected from direct project impacts by project redesign within previously surveyed and analyzed areas.

ORNI 50, LLC and its contractors to comply with project component relocation requirements. USFS and BLM to require the relocation of project components as needed. At least 90 days prior to construction.

Mitigation Measure CUL-3: The CD-IV Project Alternative 3 design of September 19, 2012, was in part developed to avoid historic properties. Where the USFS and BLM decide that National Register-eligible or listed cultural resources cannot be protected from direct impacts by project redesign, ORNI 50, LLC shall comply with appropriate mitigative treatment(s) that will be detailed in the MOA.

ORNI 50, LLC and its contractors to implement measure as defined. USFS and BLM to ensure compliance with the MOA. At least 90 days prior to and during construction.

Mitigation Measure CUL-4: A Historic Properties Avoidance Plan shall be developed and included in the MOA that defines and maps all known cultural resources within 150 feet of the project APE. That plan shall also detail how resources will be marked and protected as Environmentally Sensitive Areas during construction. The plan shall detail provisions for monitoring construction in locations deemed to be high-sensitivity areas for buried cultural resources currently without surface manifestations. It shall also detail procedures for halting construction, making appropriate notifications to agencies, officials, and Native Americans, and assessing register-eligibility in the event that unknown cultural resources are discovered during construction. For all unanticipated cultural resource discoveries, the Historic Properties Avoidance Plan shall detail the methods, consultation procedures, and timelines for assessing register-eligibility, formulating a mitigation plan, and implementing treatment. Mitigation and treatment plans for unanticipated discoveries shall be approved by the USFS, BLM, and the SHPO prior to implementation.

ORNI 50, LLC and its contractors to implement measure as defined. USFS, BLM, and the SHPO shall review and approve plan. At least 90 days prior to construction.

Mitigation Measure CUL-5: Archaeological monitoring shall be conducted by a qualified archaeologist familiar with the types of historic and prehistoric resources that could be encountered within the APE, under direct supervision of a principal archaeologist. All cultural resources personnel shall be approved by the BLM and USFS. A Native American monitor may be required at culturally sensitive locations identified by the USFS following government-to-government consultation with Indian tribes. The Historic Properties Avoidance Plan shall indicate the locations where Native American monitors will be required and shall specify the tribal affiliation of the required Native American monitor for each location. ORNI 50, LLC shall retain and schedule all required Native American monitors.

ORNI 50, LLC to retain a qualified archaeologist as defined. BLM and USFS to approve cultural resources personnel and review monitoring results. Prior to and during construction.

Mitigation Measure CUL-6: Prior to construction, the BLM shall ensure that the boundaries of historic properties for which project facilities appear to overlap are clearly marked on the ground with wood tachy and flagging set no more than 10 meters apart. Historic properties planned for avoidance and protection shall be designated as Environmentally Sensitive Areas (ESAs). Historic properties that are within 20 meters (65 feet) of the Direct APE will be identified and labeled as ESAs on engineering plans. ORNI 50, LLC shall retain a qualified archaeologist to conduct mandatory cultural sensitivity training for all project staff and contractors prior to construction activities associated with this undertaking.

ORNI 50, LLC and its contractors to implement measure as defined. USFS and BLM to monitor compliance. Prior to construction.

Mitigation Measure CUL-7: In the event of inadvertent discoveries during construction, operation and maintenance, or decommissioning, procedures outlined in the MOA and the HPTP shall be adhered to. At a minimum this shall include: 1) stop work orders in the vicinity of the find; 2) recordation and evaluation of the find by a qualified archaeologist; 3) notification of the find to BLM and USFS; 4) and implementation of appropriate treatment measures, such as avoidance or data recovery.

ORNI 50, LLC and its contractors to implement measure as defined. USFS and BLM to monitor compliance. During construction, operation, and decommissioning.

Mitigation Measure CUL-8: Following language developed in the MOA, the BLM shall continue to consult with Indian tribes to identify sacred sites, properties of traditional religious and cultural importance, and traditional use areas that might be affected by the CD-IV Project. In such places are identified, the BLM shall consult further with tribes to resolve access impediments or other identified impacts.

BLM to continue consultation with Indian tribes as described. USFS and BLM to monitor compliance. Prior to and during construction.

Geothermal Resources

PDM HYD-8: The well bores shall be cased with steel casing to prevent interzonal migration of the fluids, protect groundwater, and reduce the possibility of uncontrolled well flow (“blowouts”).

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. Prior to and during construction.

PDM HYD-9: Containment basins/sumps constructed at each drill site for the containment and temporary storage of all drilling fluid, drilling mud and cuttings and stormwater runoff shall be constructed to meet RWQCB requirements. Upon completion of drilling activities, the solids remaining in the pit will be dried and tested in accordance with the requirements of the SWRCB Water Quality Order No. 2003-0003 - Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality or the project-specific requirements of the LRWQCB, if authorized by the Regional Water Quality Control Board, USFS and BLM, buried in the pit.

ORNI 50, LLC and its contractors to implement measure as defined. BLM, USFS, and RWQCB to monitor compliance. Prior to, during, and after construction.
MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

Geothermal Resources (cont.)

PDM HYD-10: The power plant site shall be constructed to prevent offsite discharge from accidental spills of geothermal fluid, binary working fluid, or other materials stored or used on the site. The plant and well pads shall be designed so that spills shall be contained on site.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. Prior to and during construction.

PDM HYD-11: Isolation valves shall be located within the pipeline to prevent any backflow of geothermal fluid, should a pipeline rupture or major leak occur.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. Prior to and during construction.

PDM HYD-12: In-line sensing equipment and automatic shutdown controls shall be installed to detect pipeline leaks or ruptures and shut in the wells in the event of an electric failure or detected sudden drop in pipeline pressure.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. During construction.

PDM HYD-13: ORNI 50, LLC shall prepare and implement a "Spill or Discharge Contingency Plan" and "Well Blowout Contingency Plan" to prevent, control, contain, clean up and mitigate the impacts of any large spills of geothermal fluid.

Prepare and implement a Spill or Discharge Contingency Plan and Well Blowout Contingency Plan BLM and USFS to review and approve the "Spill or Discharge Contingency Plan" and "Well Blowout Contingency Plan". BLM to monitor compliance. Prior to and during construction.

Geologic, Soil and Mineral Resources

PDM GEO-1: Topsoil shall be salvaged, as feasible, and stockpiled (no more than two feet high) for use during subsequent reclamation of the disturbed areas.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. During construction.

PDM GEO-2: Subsoils shall be de-compacted as part of reclamation prior to the replacement of topsoil.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. During construction.

PDM GEO-3: ORNI 50, LLC shall construct the project in conformance with recommendations by the geotechnical engineer.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. Prior to and during construction.

PDM GEO-4: ORNI 50, LLC commits to continuing to operate the existing geothermal projects in conformance with the Plans of Operation, Injection and Utilization, approved by the BLM and USFS, as well as in conformance with monitoring through the Long Valley Hydrologic Advisory Committee, and remedial action programs, which are designed to prevent, or mitigate, potential hydrothermal impacts to Owens tui chub critical habitat, the Hot Creek Hatchery and Hot Creek Gorge springs from geothermal operations conducted on federal geothermal leases in the Mono-Long Valley area. ORNI 50, LLC also commits to operating the project in conformance with these requirements.

ORNI 50, LLC and its contractors to implement measure as defined. BLM and USFS to monitor compliance. Prior to and during operation.

PDM GEO-5: The CD-IV plant shall be constructed to handle the maximum credible earthquake in the project area. The power plant and all project construction shall comply with Seismic Zone D standards, the most stringent under the International Building Code.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. Prior to and during construction.

PDM GEO-6: The CD-IV power plant and pipelines shall be designed and constructed to reasonably minimize the potential for failure or rupture in the event of fault offset in these zones.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. Prior to and during construction.

PDM GEO-7: The Emergency Contingency Plans shall include actions to be taken in the event responsible agencies declare a volcanic hazard warning or alert, or in the event of a volcanic eruption.

ORNI 50, LLC and its contractors to implement measure as defined. BLM to monitor compliance. Prior to construction.

Mitigation Measure GEO-1: Soil Erosion Control Plan Review and Approval, PDM HYD-1, HYD-3, and HYD-5 shall be reviewed and approved by a USFS watershed specialist before implementation. Erosion control and drainage plans for new and existing roads to be utilized for the project shall be designed at the greatest extent feasible the soil quality objectives contained in the USFS Pacific Southwest Region (Region 5) Watershed and Air Management Manual (Supplement R5-2500-55-2012-1). In developing the plan, ORNI 50, LLC and its contractor shall consult with the USFS to determine the appropriate soil quality objective(s) to be met following construction (for temporary construction disturbances), and following decommissioning (for the site restoration). As part of the erosion control and drainage plans, ORNI 50, LLC and its contractor shall implement an appropriate combination of BMPs, selected from the USFS Water Quality Management Handbook (R5 FSH 2509.22, Chapter 10, Amendment 2509.22-2011-1), that are necessary to meet or exceed the applicable soil quality objective(s) (i.e., maintain or enhance soil quality and function).

ORNI 50, LLC and its contractors to prepare and implement an erosion control and drainage plan. BLM and USFS to review and approve submitted plan. BLM to monitor compliance. At least 30 days prior to construction.

Mitigation Measure GEO-2: Soils and Geotechnical Investigation, Prior to issuance of a grading permit or use permit, a qualified geotechnical engineer shall prepare and submit to the BLM and USFS a final geotechnical investigation that provides recommendations to address seismic safety, including determination of the appropriate IBC Seismic Performance Category for the site, and design requirements for foundations, retaining walls and excavation. The scope of the geotechnical report shall include the plant site as well as the pipeline route and well sites. The geotechnical investigation shall identify and evaluate the presence of expansive, compressible or liquefiable soils and, if present, shall make recommendations for site preparation or design necessary to avoid or reduce adverse structural impacts. Structural foundations shall not be founded on engineered fill, nor on native soil, unless it is demonstrated that the soils will be adequate to support the foundation. A California-licensed geotechnical engineer shall be retained by ORNI 50, LLC to be present on the project site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the geotechnical investigation. When needed, the geotechnical engineer shall provide structure-specific geologic and geotechnical recommendations that shall be documented in a report approved by the permitting agency.

ORNI 50, LLC shall retain a qualified California-licensed geotechnical engineer to prepare a final geotechnical investigation, as described. BLM to review and approve the final geotechnical investigation, and monitor compliance. At least 30 days prior to construction.
### Mitigation, Monitoring and Reporting Program for the Casa Diablo IV Project

#### Geologic, Soil and Mineral Resources (cont.)

| Mitigation Measure GEO-3: Subsidence Monitoring and Mitigation | USGS and LVHAC to review the existing subsidence monitoring program. The existing program will be expanded to include additional monitoring, as appropriate and necessary. | BLM to monitor compliance. | At least 30 days prior to construction. |
| Mitigation Measure GEO-4: Surface Fault Rupture Hazard Investigation | ORNI 50, LLC shall include in PDM GEO-7 a requirement to provide the BLM and USFS the results and findings of the surface fault rupture hazard investigation and demonstrate that such findings have been incorporated where necessary into the final layout and design of the project. The Surface Fault Rupture Hazard Investigation shall conform to California Geological Survey Note 49, Guidelines for Evaluating the Hazard of Surface Fault Rupture (CGS, 2002) and shall be prepared and certified by a California-licensed geotechnical engineer. | BLM to review the surface fault rupture hazard investigation and approve, if adequate, the applicant’s demonstration that findings were incorporated into the final layout and design of the CD-I Project. | At least 30 days prior to construction. |

#### Grazing, Wild Horses and Burros

| Mitigation Measure GRZ-1: To facilitate livestock management, upon submission of the Utilization Plan, the USFS Authorized Officer shall review the affected grazing allotments and recommend appropriate locations for additional under-crossings, if any, in any continuous segment of above-ground pipeline extending one-half mile or longer. | ORNI 50, LLC and its contractors to prepare a Utilization Plan. | BLMT and USFS to review and approve, if adequate, the Utilization Plan. | Prior to construction. |
| Mitigation Measure GRZ-2: The USFS may seek reimbursement from the geothermal lessee for the permanent loss of 15.3 acres of grazing habitat and for the costs of implementing the livestock escape management plan if it is demonstrated that the lessee’s project operations directly result in stray livestock. The USFS Authorized Officer shall coordinate with the Term Grazing Permits to mitigate the loss. | USFS to monitor livestock for stray animals. | USFS to determine if a livestock escape management plan and/or reimbursement is required. | During construction and operation. |

#### Land Use

| PDM LU-1: Geothermal exploration and development projects shall be carried out with the fewest visual intrusions reasonably possible (consistent with Mono County Conservation/Open Space Element, Goal I, Objective F). | ORNI 50, LLC and its contractors to implement measure as defined. | USFS and BLM to monitor compliance. | Prior to and during construction. |
| PDM LU-2: Prior to operation of the project, ORNI 50, LLC shall prepare a Site Abandonment-Reclamation Plan in conformance with BLM and USFS requirements. When project operations are complete, ORNI 50, LLC shall restore the site to approximate pre-Project land uses according to the plan requirements. | ORNI 50, LLC and its contractors to implement measure as defined. | USFS and BLM to monitor compliance. | Prior to decommissioning. |

#### Noise

| PDM NOI-1: Mufflers shall be used on all drilling rig engines. | ORNI 50, LLC and its contractors to implement measure as defined. | BLM to monitor compliance. | During construction. |
| PDM NOI-2: Construction noise shall be minimized through operational practices which avoid or minimize those practices which may typically generate greater noise levels, or generate distinctive impact noise. | ORNI 50, LLC and its contractors to implement measure as defined. | BLM to monitor compliance. | During construction. |
| PDM NOI-3: Prior to commencing any construction activity associated with the project, ORNI 50, LLC shall submit, and secure the approval of the BLM and USFS, a program designed to adequately respond to noise complaints. As part of the program, ORNI 50, LLC shall publish a telephone number for use by individuals for filing of complaints or inquiries regarding the level of noise from construction operations. A designated representative of the permittee shall be available 24 hours a day to receive any filed complaints or inquiries, and ORNI 50, LLC shall make reasonable efforts to investigate and respond to any such complaint or inquiry within 24 hours of the complaint or inquiry. ORNI 50, LLC shall record each filed complaint or inquiry, and the results of its investigation and response, on a form, a copy of which shall be delivered to the BLM and USFS staff designated to receive these forms within 24 hours of the complaint or inquiry. | ORNI 50, LLC and its contractors to implement measure as defined. | USFS and BLM to review and approve noise complaint response program. | ORNI 50, LLC to ensure compliance. | Prior to and during construction. Submit copy of complaint/inquiry to USFS and BLM within 24 hours of receipt of complaint/inquiry. |

#### Mitigation Measure NO-1: ORNI 50, LLC shall prepare and implement a Noise Management Plan to ensure that operational noise levels associated with CD-I Project well pumps do not increase ambient noise levels at Shady Rest Park by more than 3 dBA. The plan shall be submitted to the BLM and USFS for review and approval prior to the commencement of well pump operations. The plan shall include a proposal designed by an acoustical engineer to perform baseline noise measurements at Shady Rest Park at locations developed through consultation with USFS and the Town of Mammoth Lakes. The plan shall include a requirement for an acoustical engineer to collect additional measurements at the same locations as the baseline survey once the well pumps are operational to verify that well pump noise levels do not increase ambient noise levels by more than 3 dBA. | ORNI 50, LLC to prepare and implement a Noise Management Plan as described. | BLM and USFS to review and approve Noise Management Plan, and monitor compliance. | Within 30 days of operation commencing. |
## MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

### Noise (cont.)

**Mitigation Measure NO-1 (cont.):** The plan shall identify specific acoustical engineer-recommended measures to be implemented by ORNI 50, LLC in order to reduce noise levels to within 3 dBA of baseline conditions if the measurements that include pump operations exceed the baseline measurements by more than 3 dBA. Noise control techniques may include, but be limited to: locating the well pump within an enclosed concrete building, use of noise walls or equivalent sound attenuation structures, and the use of pumps and equipment with special noise control specifications designed to specifically achieve the desired noise reductions. The plan shall require an acoustical engineer to take additional noise measurements after the noise reduction improvements are implemented to ensure the required noise level is met. In the event that the measured noise levels still exceed the baseline level by more than 3 dBA, additional noise control techniques shall be initiated to correct the violation.

### Population and Housing

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### Public Safety, Hazardous Materials and Fire

#### PDM HAZ-1:
ORNi 50, LLC shall comply with all local, state, and federal regulations regarding the use, transport, storage, and disposal of hazardous materials and wastes. Its Hazardous Materials Business Plan shall be updated to incorporate the new power plant.

<table>
<thead>
<tr>
<th>Measure</th>
<th>Action</th>
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<tbody>
<tr>
<td>ORNi 50, LLC and its contractors</td>
<td>to implement measure as defined.</td>
</tr>
<tr>
<td>BLM and USFS</td>
<td>to review the Hazardous Materials Business Plan and monitor compliance.</td>
</tr>
<tr>
<td>During construction and operation.</td>
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#### PDM HAZ-2:
N-pentane usage and storage at the CD-IV facility shall be incorporated into ORNi 50, LLC’s Risk Management Plan and Process Safety Management program.

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<tr>
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<td>Prior to operation.</td>
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#### PDM HAZ-3:
All construction equipment shall be equipped with spark arresters. All vehicles shall be equipped with fire extinguishers and shovels.

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<td>Prior to and during construction.</td>
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#### PDM HAZ-4:
Fire extinguishers shall be available during all construction activities. Water that is used for construction and dust control shall be available for fire fighting.

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#### PDM HAZ-5:
The power plant shall have an emergency fire pump to provide water for fire suppression.

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#### PDM HAZ-6:
Cooking, campfires, or fires of any kind shall not be allowed.

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#### PDM HAZ-7:
Personnel shall be allowed to smoke only in designated areas, and they shall be required to follow applicable Inyo National Forest regulations regarding smoking.

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#### PDM HAZ-8:
Any special permits required for welding or other similar activities shall be applied for through, and received from, the District Ranger before these operations are conducted.

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#### PDM HAZ-9:
ORNi 50, LLC shall prepare an Emergency Plan to provide guidance to field personnel and management in the event of an uncontrolled well flow, pipeline break or other field-related emergency. The plan shall address the various hazards or problems that might be encountered and it will specify appropriate preventive or anticipatory actions, equipment requirements, as well as specific responses, notifications and follow-up procedures in the event of such a field emergency. The plan shall include emergencies such as accidents and injuries.

<table>
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<tr>
<th>Measure</th>
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<tbody>
<tr>
<td>ORNi 50, LLC</td>
<td>to prepare and implement an emergency plan.</td>
</tr>
<tr>
<td>BLM and USFS</td>
<td>to review and approve the emergency plan.</td>
</tr>
<tr>
<td>BLM</td>
<td>to monitor compliance.</td>
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<tr>
<td>Prior to construction.</td>
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</table>

#### PDM HAZ-10:
ORNi 50, LLC and/or its contractors shall conduct daily routine visual inspections of the construction areas during construction to identify and correct any operational problems that could lead to a hazardous materials release. ORNi 50, LLC operators stationed at the Casa Diablo operations center shall continuously monitor the well and pipeline operations through the data transmitted to the center by the well and pipeline monitoring sensor. In addition, these operators shall also conduct regular, routine visual inspections of the well sites and pipeline.

<table>
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<tr>
<td>ORNi 50, LLC and its contractors</td>
<td>to implement measure as defined.</td>
</tr>
<tr>
<td>ORNi 50, LLC</td>
<td>to submit bi-monthly report to BLM and USFS for review.</td>
</tr>
<tr>
<td>During construction and operation.</td>
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</table>

#### PDM PSU-1:
Solid waste materials generated during project construction shall either be collected by a licensed waste hauler or transported by ORNi 50, LLC and deposited at a facility authorized to receive and dispose of these materials. Portable chemical sanitary facilities shall be used by all personnel. These facilities shall be maintained by a local contractor.

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</table>
### Mitigation, Monitoring and Reporting Program for the Casa Diablo IV Project

#### Public Safety, Hazardous Materials and Fire (cont.)

| Mitigation Measure PHS-1: ORNI 50, LLC shall prepare emergency contingency plans, including a Spill or Discharge Contingency Plan, a Hazardous Gas Contingency Plan, and an Injury Contingency Plan, and submit these plans for technical review to the USFS, the BLM, the LVFPD, and the MLFPD prior to construction. The Spill or Discharge Contingency Plan shall be designed to apply to spills or other releases at all project facilities where potential water quality pollutants shall be utilized or stored, including geothermal fluid pipelines, the power plant, the substation, and other facilities where fuels, oils, and other chemicals may be stored or utilized. In consultation with the local agencies, the BLM and USFS shall determine any additional measures that shall be included in the emergency contingency plans and these measures shall be implemented by ORNI 50, LLC. The emergency contingency plans shall include, but not be limited to, the following: 1. Identification of blowout prevention equipment and emergency containment equipment that shall be maintained and readily accessible at all times. Equipment could include construction equipment, water trucks, tankers, and absorbents. 2. Specific procedures to shut in or control the flow, and appropriate control procedures if the means to control the flow is lost. 3. Specific procedures and equipment to construct sumps, dikes and contain flow, spills or leaks of geothermal fluid, drilling mud, and petroleum products. 4. Hazardous gas monitoring, action levels, and emergency procedures. 5. Identification of emergency response providers and appropriate regulatory agencies to be notified in the event of an emergency. 6. Training of all site personnel and construction workers in emergency contingency procedures described in the plans and maintenance of records of worker training. | ORNI 50, LLC shall prepare and implement an emergency contingency plans. | ORNI 50, LLC to submit emergency contingency plans to the USFS, BLM, LVFPD, and the MLFPD for review and approval. | Prior to construction. |

| Mitigation Measure PHS-2: ORNI 50, LLC shall prepare a Fire Protection and Prevention Plan for construction, operation, and maintenance activities. The Fire Protection and Prevention Plan must be submitted to and approved by the Inyo National Forest, the LVFPD, and the MLFPD prior to construction. In consultation with the local agencies, the USFS shall determine any additional BMPs that shall be implemented. The Fire Protection and Prevention Plan shall include, but not be limited to, the following: 1. A requirement for the number and size of water trucks equipped with 50 feet of fast response hose with fog nozzles that shall be maintained on-site during construction for immediate response to fire incidents. 2. Training of all construction workers on fire prevention methods, the proper use of firefighting equipment and procedures to be followed in the event of a fire. 3. Maintenance of fire extinguishers and fire-fighting equipment at each construction site sufficient to extinguish small fires. 4. Definition of appropriate defensible spaces that shall be maintained around permanent structures for acceptable wildland fire protection. | ORNI 50, LLC and its contractors to implement measure as defined. | USFS, the LVFPD, and the MLFPD to review and approve submitted plan. | Prior to construction. |

### Recreation

| Mitigation Measure REC-1: Sections of the pipeline route not located next to existing roads shall be monitored for evidence of use by off-highway vehicles (OHVs). If such evidence is found, ORNI 50, LLC shall notify the USFS and comply with its requirements for funding or implementation of actions to prevent use by OHVs, such as the posting of signs and the physical blocking of access. | ORNI 50, LLC and its contractors to implement measure as defined and notify USFS if evidence of OHV use is observed in areas where the pipeline route is not located adjacent to existing roads. | USFS to review and approve informational materials. | During construction and operation. |

| Mitigation Measure REC-2: ORNI 50, LLC shall prepare and implement a Winter Access Contingency Plan in accordance with the requirements of the USFS. The plan shall be designed to ensure that there is at least one location along Sawmill Road which is maintained to provide a safe and easy crossing by cross-country skiers. | ORNI 50, LLC and its contractors to prepare and implement a winter access contingency plan upon USFS approval. | USFS to review and approve submitted plan. | Prior to construction. |

| Mitigation Measure REC-3: For public safety, an appropriate temporary fence shall be constructed around each drilling sump/pit when the associated drill site is not continuously staffed by personnel and until the pit is backfilled. See also TR-6. | ORNI 50, LLC and its contractors to implement measure as defined. | BLM to monitor compliance. | During construction. |

### Mitigation Measure REC-1: ORNI 50, LLC shall post informational materials about the CD-IV Project at, but not limited to: nearby recreation sites/campgrounds, access points, the Mammoth Lakes Trail System website, and the Mammoth Welcome Center. This material shall include construction schedules and safety information regarding trucks and other heavy equipment use on local roads and NFSRs, and identify route closures. Signage shall be designed to function during winter and non-winter conditions, and shall be consistent with USFS and Town of Mammoth signage requirements, as appropriate. In addition, construction vehicle speed shall be limited to 15 miles per hour, with temporary signage warning construction vehicles to reduce speeds in areas with blind corners, narrow roads, or hills. | ORNI 50, LLC and its contractors to prepare and distribute interpretive materials upon USFS review and approval. | USFS and Town of Mammoth Lakes to review and approve informational materials. | Prior to and during construction. |
MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

Recreation (cont.)

Mitigation Measure REC-2: ORNI 50, LLC shall monitor all pipeline routes for evidence of OHV use and if such use is identified, further
OHV use shall be prevented through posting of signs and the physical blocking of access, or other restriction measures. ORNI 50, LLC shall also monitor revegetation of pipeline alignments and replant vegetation if necessary.

Mitigation Measure REC-3: ORNI 50, LLC shall provide information regarding pipeline crossing locations and road closures at, but not limited to: nearby recreation sites/campsgrounds, access points, the Mammoth Lakes Trail System website, and the Mammoth Lakes Visitor Center. Signage shall be designed to function during winter and non-winter conditions, and shall be consistent with USFS and Town of Mammoth signage requirements, as appropriate. In addition, operational vehicle speed shall be limited to 15 miles per hour and road and signage shall be installed, consistent with USFS and County requirements. ORNI 50, LLC shall also coordinate with the Town of Mammoth Lakes and the USFS to ensure that a Shady Rest CVS staging area and access to the staging area is plowed to provide winter access. In addition, banks formed by road plowing shall be shaped such that crossing grade changes are gradual in areas where cross country use is prevalent.

In addition, implement Mitigation Measures VIS-1 through VIS-3.

Socioeconomics and Environmental Justice

Traffic/Access/Circulation

PDM TR-1: ORNI 50, LLC shall meet Caltrans' encroachment permit requirements in order to construct the pipeline under U.S. Highway 395.

PDM TR-2: project vehicles shall not block Sawmill Road (03S25) or Sawmill Cutoff Road (03S08) by either waiting or parking on either road.

PDM TR-3: Where the pipeline shall be constructed under existing roads by open trench construction and restricting public access, appropriate traffic control measures shall be established to warn traffic of temporary road closures.

PDM TR-4: For those sections of the pipeline not immediately adjacent to an access road, pipeline construction equipment shall “catwalk” over the top of the existing vegetation without removing it to avoid the need to grade the pipeline route or an access road and minimize both ground disturbance and visual impact. Vehicle access to these off road construction areas shall be limited to that specifically necessary for construction. No vehicles shall be allowed to turn or drive in any area beyond a 20 foot wide temporary construction corridor along the pipeline route.

PDM TR-5: ORNI 50, LLC shall attempt to work with the Town of Mammoth Lakes and the USFS to plow the road to and the parking lot at Shady Rest Park in the winter to better accommodate recreational traffic and parking for cross-country skiers and snowmobilers. This plan shall provide the majority of the winter access for the new well pads for the project.

PDM TR-6: At vehicle traffic shall be restricted to designated access roads. project-related vehicles shall be restricted to travelling no faster than 25 mph on Sawmill Cutoff Road (03S08) and on other unimproved roads in the project area.

Mitigation Measure TRA-1: Prior to construction and/or decommissioning, ORNI 50, LLC shall develop a Coordinated Transportation Management Plan and work with Mono County to prepare and implement a transportation management plan for roadways adjacent to and directly affected by the planned CD-IV Project facilities, and to address the transportation impact of the overlapping construction projects within the vicinity of the CD-IV Project in the region. The transportation management plan shall include, but not be limited to, the following requirements:
1. Coordination of individual traffic control plans for the project and nearby projects.
2. Coordination between the contractor and Mono County in developing circulation and detour plans that include safety features (e.g., signage and flaggers). The circulation and detour plans shall address:
   a. Full and partial roadways closures.
   b. Circulation and detour plans to include the use of signage and flagging to guide vehicles through and/or around the construction zone, as well as any temporary traffic control device.
   c. Bicycle/Pedestrian detour plans, where applicable.
   d. Parking along public roadways.
<table>
<thead>
<tr>
<th>Traffic/Access/Circulation (cont.)</th>
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<tr>
<td>Mitigation Measure TRA-1 (cont.):</td>
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<tr>
<td>e. Haul routes for construction trucks and staging areas for instances when multiple trucks arrive at the work sites.</td>
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<tr>
<td>f. Repairing and restoring affected roadway rights-of-way to their original condition or better after construction and decommissioning are completed, where applicable.</td>
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<tr>
<td>Protocols for updating the transportation management plan to account for delays or changes in the schedules of individual projects.</td>
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<th>Utilities and Public Services</th>
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<tr>
<td>No Mitigation Measures</td>
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<thead>
<tr>
<th>Visual/Aesthetics</th>
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<tr>
<td>PDM VIS-1: Any pipeline route selected within the pipeline corridor shall be located at least 300 feet from the developed portions of Shady Rest Park or substantially screened from view from the developed portions of the park by topography or vegetation.</td>
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<tr>
<td>ORNI 50, LLC and its contractors to integrate mitigation into the construction plans, details, drawings and specifications.</td>
</tr>
<tr>
<td>USFS to monitor compliance.</td>
</tr>
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| PDM VIS-2: In sections of the project area with a USFS Visual Quality Objective (VQO) of "partial retention," ORNI 50, LLC shall, with the approval of the USFS, locate the pipeline so that it is not immediately adjacent to existing roads where possible, and takes advantage of existing vegetation or terrain screening opportunities to reduce the visibility of the pipeline from these roads. |
| ORNI 50, LLC and its contractors to integrate USFS VQO of "partial retention" and topographical mapping into construction plans, details, drawings and specifications to identify screening opportunities. ORNI 50, LLC to implement measure upon USFS approval. |
| USFS to review and approve pipeline alignment. |
| Prior to construction. |

| PDM VIS-3: The pipeline segments to be constructed (a) in areas with a VQO of "retention" in the vicinity of Sawmill Cutoff Road, and (b) in Inyo National Forest managed-land in areas with the VQO of "retention" and visible from State Route 203 and/or U.S. Highway 395 shall use texture and color or colors (approved by the authorized officer) selected to blend with the color and texture of the characteristic landscape. |
| ORNI 50, LLC and its contractors to integrate USFS VQO of "retention" into the construction plans, details, drawings and specifications to identify pipeline segments at which this measure will be implemented. ORNI 50, LLC to implement measure upon USFS approval. |
| USFS to approve of texture and color(s) to be used for pipeline segments in areas identified in the measure. |
| Prior to construction. |

| PDM VIS-4: All power plant and well pad facilities shall be painted a neutral color to blend in with the environment, using a color that was approved and used for the existing Basalt Canyon facilities and/or another color scheme approved by the USFS. |
| Use USFS-approved paint on all power plant and well pad facilities. ORNI 50, LLC to implement measure upon USFS approval. |
| USFS to confirm paint color. ORNI 50, LLC to implement measure upon USFS approval. |
| During construction and operation. |

| Mitigation Measure VIS-1: Landscape Plan. Prior to construction, ORNI 50, LLC shall prepare, submit for approval by the USFS, and implement a landscape plan that includes planting of native trees and shrub vegetation at select locations to further screen well site facilities and the geothermal pipeline from view from Sawmill Cutoff Road (NFSR 03S30), Sawmill Road (03S25), Shady Rest Park, U.S. Highway 395, SR 203, and the Knolls Loop. The landscape plan shall be coordinated with the revegetation plan (refer to Mitigation Measure VEG-1) including a monitoring and reporting plan. Permanent fencing shall be precluded to reduce potential barriers to wildlife. To minimize adverse visual effects from the above mentioned roads and park, ORNI 50, LLC shall landscape the following areas such that direct views and corners of the well facilities and pipeline are at least 65% obstructed from any location within a ten-year period. Monitoring at the end of the third growing season shall be conducted to determine if success standards are being met. If it is determined that success standards are not being met, ORNI 50, LLC shall take immediate action to re-implement the Landscape Plan to ensure compliance by the tenth year period. A landscape plan. ORNI 50, LLC to implement measure upon USFS approval. USFS to review and approve submitted plan. USFS to confirm paint color. ORNI 50, LLC to implement measure upon USFS approval. |
| ORNI 50, LLC to prepare and implement a Landscape plan. ORNI 50, LLC to implement measure upon USFS approval. |
| USFS to review and approve submitted plan. USFS to confirm paint color. ORNI 50, LLC to implement measure upon USFS approval. |
| Prior to and after construction. |
MITIGATION, MONITORING AND REPORTING PROGRAM FOR THE CASA DIABLO IV PROJECT

Visual/Aesthetics (cont.)

Mitigation Measure VIS-2: Pipeline Crossovers and Expansion Loops. At locations where one pipeline crosses over another adjacent to Sawmill Road (03S25) and Pole Line Road (NFSR 03S125) (near well facility sites 56-29,66-25, 77-25, 81-36, 12A-31, 23-31, 35-31, and 55-31) and where the terrain is not a constraining factor, ORNI 50, LLC shall reduce the height of crossovers and expansion loops by:

a. Lowering the existing pipeline or new pipeline (whichever is easiest) belowground or within a 3-foot deep trench and design the pipeline crossover with pairs of 30, 45 or 90 degree ells to ensure that the overall height of the crossover is at or below 5.5 feet aboveground.

b. All expansion loops shall be horizontal to minimize overall height of installed pipelines to less than 5.5 feet aboveground.

Mitigation Measure VIS-3: Power Plant Landscape Plan. Prior to construction, ORNI 50, LLC shall prepare, submit for approval by the USFS, and implement a landscape plan that includes planting of native trees, shrubs, and perennial vegetation to screen views from Antelope Springs Road (03S95). The landscape plan shall be coordinated with the revegetation plan (refer to Mitigation Measure VEG-1) including a monitoring and reporting plan. ORNI50, LLC shall landscape the area immediately adjacent to Antelope Springs Road and at select locations such that direct views and corners of the power plant are at least 65% obstructed from any location within a ten-year period. Monitoring shall be conducted at the end of the fifth growing season to determine whether success standards are being met. If it is determined that success standards are not being met, ORNI 50, LLC shall take immediate action to re-implement the landscape plan to ensure compliance by the tenth-year period.

Water Resources

PDM HYD-1: Appropriate erosion control measures shall be used to control all offsite discharges, and the project shall adopt any relevant Lahontan Regional Water Quality Control Board (LRWQCB) and USFS best management practices to prevent soil erosion, including the preparation of a Storm Water Pollution Prevention Plan.

PDM HYD-2: To the extent possible, the pipeline route and any access roadways shall be located outside of any riparian conservation areas (RCAs) delineated by the USFS.

PDM HYD-3: Existing roads shall be evaluated and properly graded and repaired in areas that show evidence of enhanced erosion.

PDM HYD-4: Exposed, disturbed soils in construction areas shall be watered to minimize wind erosion and dust. Topsoil piles shall be covered to minimize erosion during wind storms. See also AQ-1.

PDM HYD-5: A site drainage and runoff management plan shall be prepared. All new access roads shall comply with the plan to minimize erosion and off-site sedimentation. Off-site stormwater shall be intercepted in ditches and channeled around the well sites to energy dissipators as necessary to minimize erosion.

PDM HYD-6: The pipeline route shall not be cleared or graded to minimize soil disturbance.

PDM HYD-7: The project shall obtain coverage under, and comply with, the California Construction General Storm Water Permit.

Mitigation Measure SW-1: Comprehensive Site Drainage and Runoff Management Plan (Drainage Plan). According to PDM HYD-5, the applicant shall prepare a Drainage Plan. Additionally, the applicant shall ensure that the prepared plan adheres to the following:

The applicant shall prepare and submit to the LRWQCB, BLM and USFS for review a Drainage Plan that shall encompasses all project facilities. The Drainage Plan shall evaluate potential changes in stormwater flow that may result from implementation of the project, to the extent required to determine implementation of appropriate measures to minimize, avoid, retain, or otherwise prevent increases in stormwater runoff from leaving the site, and minimize potential for associated erosion or sedimentation. The Drainage Plan shall also delineate the location and sizing for stormwater retention facilities, on-site drainages, and other required facilities as warranted to ensure that stormwater facilities are sized appropriately. All stormwater and drainage facilities shall be sized to ensure that the implementation of the project shall result in no net increase in stormwater discharge from the site during at least a 20-year, 24-hour storm event. With respect to decommissioning, a Drainage Plan shall be included in the reclamation plan, which shall be submitted to relevant agencies for approval prior to the initiation of the decommissioning process. This shall ensure that final post-decommissioning grading reflects natural site contours and minimizes potential for concentration of stormwater flows, erosion, and sedimentation. All facilities shall comply with the all aspects of the Drainage Plan as indicated here and in PDM HYD-5, including existing and new access roads and roads that shall be plowed during the winter due to project operations.

Blas Vásquez
Director of Environmental Affairs

Date: August 2013

ORNI 50, LLC and contractor to integrate measures into the construction plans, details and specifications to identify locations of pipeline crossovers. ORNI 50, LLC to implement measure as defined.

USFS to review plans and specifications of pipeline crossovers. Prior to construction.

ORNI 50, LLC to prepare and implement a landscape plan for the power plant. Upon USFS approval, ORNI 50, LLC to implement measure. If landscaping does not meet success standards by the end of the third growing season, ORNI 50, LLC to re-implement measure.

USFS to review and ensure landscape plan is consistent with Mitigation Measure VEG-1. USFS to monitor landscaped areas to determine success of measure at the end of the third growing season.

Prior to construction and after construction.

BLM and USFS to monitor compliance. Prior to and during construction.

BLM and USFS to monitor compliance. Prior to and during construction.

BLM and USFS to monitor compliance. During construction.

BLM and USFS to monitor compliance. During construction.

BLM and USFS to monitor compliance. Prior to construction.

BLM and USFS to monitor compliance. During construction.

BLM and USFS to monitor compliance. Prior to construction.
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<tr>
<th>Water Resources (cont.)</th>
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<td><strong>Mitigation Measure SW-2:</strong> To ensure that sediment and other pollutants contained in well construction period containment basins/sumps shall not be released into downstream waters, the applicant shall ensure that all containment basins/sumps are constructed so as to be able to contain anticipated drill cuttings, drilling mud, other drilling liquids, and on-site flows anticipated from a 100-year event with at least one foot of freeboard to prevent overtopping. Upon completion of drilling activities and disposal of drill cuttings, all containment basins/sumps shall be backfilled and graded to match natural topography.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
</tr>
<tr>
<td><strong>Mitigation Measure SW-3:</strong> Following well completion, in the event that coverage under the Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality cannot be acquired in support of disposal of drill cuttings, the applicant shall remove all drill cuttings from each well site where on-site disposal is not available. Removed drill cuttings shall be disposed of in a landfill or other facility approved to accept hazardous wastes (or in accordance with classification of drill-cutting waste from the site), in accordance with local and state law. Remaining pits on-site shall be filled and graded to match natural conditions.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
</tr>
<tr>
<td><strong>Mitigation Measure SW-4:</strong> During well testing, the applicant shall ensure that all storage tanks and piping for geothermal fluid storage and conveyance at the well pad site shall be contained within a temporary facility that would contain spilled fluid on-site. Containment structures may include berms, containment basins, sumps, or other structures with sufficient capacity to contain the maximum volume of geothermal fluid stored on-site, with sufficient freeboard to prevent accidental release.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
</tr>
<tr>
<td><strong>Mitigation Measure SW-5:</strong> Prior to the initiation of operations, the applicant shall ensure that spill containment facilities at the power plant site incorporate measures to prevent the infiltration to groundwater of spilled fluids at the plant site, including geothermal fluid and n-pentane. In accordance with the Mono County General Plan, the capacity of containment facilities shall be equal to at least twice the volume of the entire fluid contents of the power plant facility, including pipeline capacity and the amount that would flow onto the site until automatic shutdown devices would stop the flow. Spill containment facility design shall be reviewed by the USFS and BLM prior to the initiation of construction activities for the power plant.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
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<td><strong>Mitigation Measure SW-6:</strong> During project operation, the applicant shall ensure that equipment and vehicles are routinely inspected for fluid leaks. Equipment and vehicles shall be maintained so as to prevent equipment leaks from infiltrating into soils or being washed off-site during storm events. When discovered, the applicant shall repair fluid leaks prior to use on the project site. If fluids to leak onto the project site, contaminated soil shall be removed immediately and disposed of at an approved facility, in accordance with federal, state, and local requirements.</td>
<td>ORNI 50, LLC and its contractors shall routinely inspect equipment and vehicles for fluid leaks for fluid leaks.</td>
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<td><strong>Mitigation Measure SW-7:</strong> This mitigation measure shall modify PDM HYD-2: To the extent feasible, the pipeline route and any access roads shall avoid RCAs. Any additional action, requirements, and/or designations with respect to RCAs shall be based upon guidance from USFS staff and consistent with the relevant USFS policy.</td>
<td>ORNI 50, LLC and its contractors to implement measure as defined.</td>
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