



October 18, 2021

Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Attention: Ms. Kimberly D. Bose, Secretary

Re: Mojave Pipeline Company, L.L.C.;  
Docket No. CP21-495-000,  
Response to Informal Information Request

Dear Ms. Bose:

On October 7, 2021, Mojave Pipeline Company, L.L.C. ("Mojave") received an informal request for additional environmental information from the Office of Energy Projects ("OEP") related to its proposed Oak Creek Delivery Point. Accordingly, Mojave is herein filing with the Federal Energy Regulatory Commission ("Commission") in Docket No. CP21-495-000, responses associated with that request.

### **Description of Proceeding**

On September 13, 2021, Mojave filed a prior notice request pursuant to Sections 157.203, 157.205, and 157.211 of the Commission's regulations under the Natural Gas Act for authorization to construct the Oak Creek Delivery Point located in Kern County, California.

### **Description of Information Being Filed**

Mojave is herein submitting responses to the October 7, 2021 informal request.

### **Filing Information**

Mojave is e-Filing this letter and its responses with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

Respectfully submitted,  
MOJAVE PIPELINE COMPANY, L.L.C.

By \_\_\_\_\_ /s/  
Francisco Tarin  
Director, Regulatory

Enclosures

Cc: Ms. Kimberly Poli, OEP

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

**General**

1. Confirm that Mojave would implement the FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) (2013) during construction, restoration, and operation.

Response:

Mojave confirms that FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) (2013) will be implemented without modifications during construction, restoration, and operation.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
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2. In adherence with Section III.G of FERC Plan, develop and file Project-specific spill prevention and response procedures that meet applicable requirements of state and federal agencies.

Response:

Mojave has attached behind this response, a copy of its *Spill Prevention and Control Plan*.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

October 2021

# Mojave's Oak Creek Delivery Point

## Spill Prevention and Control Plan



Mojave Pipeline  
Company, L.L.C.  
a Kinder Morgan company

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# Abbreviations and Acronyms

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EI	Environmental Inspector
Mojave	Mojave Pipeline Company, L.L.C.
MSDS	Material Safety Data Sheets
Project	Oak Creek Delivery Project
SPCP	Spill Prevention and Control Plan

# Spill Prevention and Control Plan

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## 1.0 Introduction

This Spill Prevention and Control Plan (“SPCP”) describes measures that the Oak Creek Delivery Point project (“Project”) contractor(s) would implement to prevent, control, and minimize impacts from a spill of fuels or other hazardous substances during construction of the Project. The goal of the SPCP is to minimize the potential for a spill of these substances, to contain any spills to the smallest area possible, and to protect the environment. The SPCP specifies spill prevention measures, spill response activities, and spill reporting and notification procedures.

All Project construction work will implement the SPCP measures and procedures. This SPCP does not certify the contractor or other individuals to become licensed waste haulers.

## 1.0 Prevention Measures

The contractor(s) will ensure that all practicable measures are taken to minimize the potential for and consequences of a spill during construction of the Project. The contractor(s) is responsible for complying with applicable environmental and safety laws and regulations, for training construction personnel, and for providing equipment designed to prevent pollution.

The proper use of materials and equipment greatly reduces the potential of contamination. The following is a list of general preventive practices to be implemented during construction of the Project.

- The contractor(s) must supply each construction crew with spill kits containing a sufficient quantity of absorbent and barrier materials to adequately contain and recover potential spills of fuels or lubricating oils. These kits may include, but are not limited to, drip pans, buckets, absorbent pads, straw bales, absorbent clay, sawdust, floor-drying agents, spill containment barriers, heavy plastic sheeting, plastic bags, shovels, and sealable containers. These materials must be readily accessible during all construction activities.
- The contractor(s) will train all personnel who handle fuels and other regulated substances to follow spill prevention procedures and to quickly and effectively contain and clean up spills.
- Fuels and lubricating oils for vehicles or heavy equipment would not be stored within 100 feet of dry washes/ephemeral streams or groundwater well heads.
- Refueling of construction equipment would not occur within 100 feet of dry washes/ephemeral streams or groundwater well heads.
- Authorized personnel shall only dispense fuels during daylight hours. Fuel dispensing operations may not be left unattended.

- On-site vehicles will be monitored for leaks and will receive regular maintenance to reduce the chance of leaks. Vehicle maintenance wastes, including used oils and other fluids, will be handled and managed by personnel trained in the procedures outlined in this plan.
- Storage containers will display labels that identify the contents of the container and whether the contents are hazardous. The contractor shall maintain and provide, on demand, copies of all Material Safety Data Sheets (MSDS).
- Storage containers will be kept locked to prevent any accidental release.
- Site foremen and construction personnel who will be working with hazardous or regulated substances will be trained in the requirements of this plan prior to participation in site work.

## 2.0 Spill Response

Immediately upon learning of the spill of any fuel, oil, hazardous substance, or other regulated substance, the contractor(s) will undertake the following activities.

- Identify the source of a spill and take all necessary measures to prevent further material from being spilled.
- Remove all potential ignition sources if the spilled material is combustible or flammable if it is safe to do so.
- Notify the Chief Inspector and the Environmental Inspector (“EI”).
- Assess the situation and determine subsequent clean-up activities and responsibilities.
- If the spill is beyond the response ability of on-site equipment and personnel, immediately notify the Chief Inspector that an emergency response contractor is needed.

For spills that occur on land, earthen berms will be constructed with available equipment to physically contain spills, if appropriate. Absorbent materials will also be applied to soak up spilled material, and traffic will be minimized on contaminated soils.

In the event that spills occur near the on-site well heads, regardless of size, the following conditions shall apply in addition to the measures described above.

- Trenches will be constructed to contain the spill prior to its entry into the well head. Deployment of booms, skimmers, and sorbent may be necessary if the spill reaches the water.
- Spilled material will be immediately and completely contained and cleaned up if it is safe to do so. The material manufacturer’s methods for spill cleanup will be followed as described on the material MSDS.

All contaminated soils, vegetation, absorbent materials, and other contaminated wastes shall be handled, contained, and disposed of by the contractor(s) in accordance with applicable local, state, and federal regulations.



### 3.0 Reporting Procedures

The contractor(s) is required to report all spills of hazardous substances, regardless of size or location to the EI and Chief Inspector. The contractor(s) is also required to notify the EI and Chief Inspector of any of the following hazardous conditions.

- “Hazardous substance” means any substance or mixture that presents a danger to the public health or safety, including but not limited to: a substance that is toxic, corrosive, or flammable; that is an irritant; or that, in confinement, generates pressure through decomposition, heat, or other means. The following are examples of substances that, in sufficient quantity, may be hazardous: acids; explosive; fertilizers; heavy metals such as chromium, arsenic, mercury, lead, or cadmium; industrial chemicals; paint thinners; paints; pesticides; petroleum products; poisons; radioactive materials; sludges; and organic solvents.
- “Hazardous condition” means any situation involving the actual, imminent, or probable spill, leak, or release of a hazardous substance onto the land or into the atmosphere that, because of its quantity, strength, or toxicity, its mobility in the environment, or its persistence, creates an immediate or potential danger to the public health or safety or to the environment.

Depending on the material spilled and the quantity and location of the spill, notification of appropriate federal and/or state emergency response entities may be required. Mojave’s Environmental Project Manager or Field Environmental Services Specialist shall report any hazardous substance spill or hazardous condition to the National Response Center, which is the sole federal point of contact for reporting oil and chemical spills, and/or the Arizona Emergency Response Hotline if:

- A hazardous substance has the potential to leave the property by flowing over the surface or through sewers, tile lines, culverts, drains, utility lines, or other conduit.
- A hazardous substance has the potential to reach any surface water or groundwater.
- Any hazardous substance has spilled directly into a water of the state.
- A hazardous substance is detected in the air at the boundaries of the construction activities by the senses (sight and smell) or by monitoring equipment.
- There is a hazardous condition that poses a potential threat to the public health and safety.

Reportable quantities of hazardous substances and reportable hazardous conditions include the following:

- A spill of any hazardous substance in a quantity of 5 gallons or greater on land.
- Any amount of substances such as paint, solvents, fertilizer, acids, etc.
- Any spill of solid petroleum product greater than 100 pounds.
- Any spill to a water of the state.

**The appropriate federal and state contacts for the Project are as follows:**

Federal Contact (EPA)

National Response Center (Washington, D.C.)  
Phone: (800) 424-8802 (24 Hours)

California Contact (DTSC)

Department of Toxic Substances Control (DTSC)  
Emergency Response Duty Officer (M-F 8am to 5pm)  
Phone: (800) 260-3972 or (916) 255-6504

(After Hours, weekend or Holidays)

Phone (800) 852-7550 and ask to speak to a DTSC  
Emergency Response Duty Officer

MOJAVE PIPELINE COMPANY, L.L.C.  
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Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

3. Provide a permit table that identifies the status of all required federal and state government permit approvals and consultations. Include the agency and individual contacted, the date Mojave submitted the application (or a timetable for the application's submission), or whether Mojave has received a permit. Be sure to address:
- a) U.S. Army Corps of Engineers determinations (section 404 and 408 of the Clean Water Act and section 10 of the Rivers and Harbors Act);
  - b) National Pollutant Discharge Elimination System permits;
  - c) U.S. Fish and Wildlife Service (FWS)/National Marine Fisheries Service (NMFS) clearances for the Endangered Species Act, Magnuson-Stevens Fisheries Conservation and Management Act, and Marine Mammal Protection Act;
  - d) Water Quality Certificates under section 401 of the Clean Water Act;
  - e) Clean Air Act permits;
  - f) State Historic Preservation Office consultations;
  - g) land management agency approvals;
  - h) state wetland crossing permits; and
  - i) Natural Resources Conservation Service and Farm Service Agency (regarding recommended seed mixes, lands enrolled in the Wetland Reserve Program, Conservation Reserve Program, Agricultural Conservation Easement Programs)

Response:

Mojave has attached behind this response its permit table identifying all required federal and state government permit approvals and consultations.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

AGENCY	PERMIT/APPROVAL/ CONSULTATION	ACTUAL DATE (ANTICIPATED)		AGENCY CONTACT
		SUBMITTAL	APPROVAL/REVIEW RESPONSE	
<b>Federal</b>				
Federal Energy Regulatory Commission	Prior Notice Blanket Permit Blanket Certificate under 18 CFR Section 157 of the Natural Gas Act (Prior Notice)	(September 2021)	(November 2021)	Division of Pipeline Certificates Office of Energy Projects 888 First Street, NE Washington, D.C. 20426
United States Army Corps of Engineers	Clean Water Act, Section 404, Nationwide Permit 12 (Oil or Natural Gas Pipeline Activities)	Not Applicable, Surface Water Resources Avoided	Not Applicable	Stephen Estes LAD Regulatory Division, North Coast Branch, Los Angeles and San Bernardino Counties Section Chief Los Angeles District, U.S. Army Corps of Engineers Regulatory Division 915 Wilshire Blvd., Suite 930 Los Angeles, CA 90017 (213) 452-3425
United States Fish and Wildlife Service	Consultations for impacts on federally listed threatened and endangered species and critical habitat under Section 7 of the Endangered Species Act, the Migratory Bird Treaty Act, the Bald and Gold Eagle Protection Act, and the Fish and Wildlife Coordination Act	June 9, 2021	Finding of no further comments- July 9, 2021	Brian Croft- Division Supervisor Palm Springs Fish and Wildlife Office 777 E. Tahquitz Canyon Way, Suite 208 Palm Springs, CA 92262 (805) 677-3398
California State Historic Preservation Office	National Historic Preservation Act (NHPA), Section 106 Consultation	June 14, 2021	Finding of <i>No Historic Properties Affected</i> received June 22, 2021	Julianne Polanco State Historic Preservation Officer Office of Historic Preservation 1725 23 <sup>rd</sup> Street, Suite 100 Sacramento, CA 95816 Attention: Brenda Greenaway, Associate State Archaeologist (916) 445-7036 Brendon.Greenaway@parks.ca.gov

AGENCY	PERMIT/APPROVAL/ CONSULTATION	ACTUAL DATE (ANTICIPATED)		AGENCY CONTACT
		SUBMITTAL	APPROVAL/RESPONSE	
<b>State (California)</b>				
California Regional Water Quality Control Board (RWQCB) - Lahontan District	Section 402 Clean Water Act, California Pollution Discharge Elimination System	Not Applicable, Resources avoided	Not Applicable	Victorville Branch Office 15095 Amargosa Rd., Bldg 2 - Suite 210 Victorville, CA 92394 (760) 241-6583
California Regional Water Quality Control Board (RWQCB) - Lahontan District	Section 401 Clean Water Act; State Certification of Water Quality	Not Applicable, Resources avoided	Not Applicable	Jan Zimmerman
California Department of Fish and Wildlife Service (DFW)	California Environmental Quality Act	Initially contacted on March 29, 2021 and followed up on July 1, 2021	Pending response	Abimael León, Ph.D. California Department of Fish and Wildlife Central Region (Region 4) FERC Coordinator 1130 East Shaw Avenue Fresno, CA 93710
<b>Local</b>				
Kern County Planning & Natural Resources Department	Statutory CEQA Exemption, Ministerial Permit	June 14, 2021	July 30, 2021 No Permit Required	Jake Rathbun, (661) 862-5016 Kern County, Planning and Natural Resources Department 2700 "M" Street, Suite 100 Bakersfield, CA 93301
Eastern Kern Air Pollution Control District	Fugitive Dust Activity Permit	Not Applicable, Project under size threshold	Not Applicable	Jeremiah Cravens Senior Air Quality Specialist 2700 "M" Street, Suite 302 Bakersfield, CA 93301-2370 (661) 862-5250 cravensj@kerncounty.com

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4. Provide the anticipated construction schedule including the start and end date of the proposed Project.

Response:

Mojave anticipates construction beginning the end of November 2021, in order to place the proposed Oak Creek Delivery Point into service by no later than January 15, 2022.

Response prepared by or under the supervision of:

Caryn Franco  
Mojave Project Manager  
713-420-3506

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**Resource Report 1**

5. Mojave states it would impact 0.66 total acre of land; however, this value does not appear to be inclusive of the two Project access roads. Provide the acreage of land encompassing the two Project access roads and confirm the total Project area.

Response:

Mojave confirms that the east access road is approximately 950-feet long and 10-feet wide (0.218-acre) and the west access road is approximately 1,000-feet long and 25-feet wide (0.574-acre). With the addition of the access roads, the total acres of land affected by Mojave's project will be 1.45 acres.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
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6. Mojave states it would use two existing access roads owned by CalPortland for construction of the Project. Clarify if Mojave proposes to utilize these access roads during operation of the Project. Clarify if modifications or updates would be necessary during construction or operation of the Project, and describe those modifications.

Response:

Mojave confirms that the access roads would continue be used after construction during operation of the Project facilities. No modifications or improvements to the access roads will be required during construction or operation of the Project.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548



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7. The Introduction section of Mojave's Environmental Summary states "the Oak Creek Delivery Point...is the only facility being proposed by Mojave"; however, the Project Description section of Mojave's Environmental Summary states that "Mojave will install electronic gas measurement/gas quality monitoring equipment and a communication antenna within the fenced-in parameters of the future CalPortland meter station." Clarify this apparent discrepancy and provide the following additional information.
- a. Clarify the permitting status and construction timeline for the future CalPortland meter station.
  - b. Clarify the timing of Mojave's installation of gas measurement/monitoring equipment and the communication antenna relative to installation of the new Oak Creek Delivery Point and CalPortland's construction of its meter station.
  - c. Identify the height of the proposed communication antenna.
  - d. Clarify if the area identified on Mojave's Figure 3 as "Meter site Workspace" would be used as temporary workspace for the Project.

Response:

Mojave confirms that the Oak Creek Delivery meter includes the use of an existing tap as well as the installation of electronic gas measurement ("EGM") equipment to be located within the CalPortland Cement Company ("CalPortland") meter station. The EGM will include transmitters, a gas flow computer and the communications equipment.

- 7a. Mojave understands that CalPortland is still in the process of securing the permits necessary to construct its facilities and anticipates beginning construction in late November 2021.
- 7b. As stated in Mojave's response to Data Request No. 4 herein, Mojave anticipates starting construction in late November 2021. At that time, Mojave is planning to conduct minor preparation work to facilitate the interconnection with CalPortland's interconnecting lateral at its existing tap site. Mojave understands that CalPortland will begin construction of its facilities in late November 2021 as well. Depending on the construction progress of CalPortland's facilities, Mojave may install its EGM and communications equipment during December 2021 and January 2022.
- 7c. The communications antenna will be under twenty-five (25) feet tall.
- 7d. The area identified as "Meter site Workspace" was included as part of the biological evaluation section as Figure 3. Mojave clarifies that this area will be used by CalPortland to build its fenced-in meter station. Part of this area will be

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
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used by Mojave as temporary workspace during the installation of its EGM equipment.

Response prepared by or under the supervision of:

Caryn Franco  
Mojave Project Manager  
713-420-3506

MOJAVE PIPELINE COMPANY, L.L.C.  
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**Resource Report 2**

8. Identify the source and anticipated volume of water (gallons) required for Project construction (e.g., fugitive dust control, hydrostatic testing).

Response:

While fugitive dust emissions are anticipated to be minimal, if fugitive dust emissions become an issue, based on the limited footprint of construction activity, Mojave may use up to 200 gallons of water municipally sourced and hauled in by a water truck to spray areas within its project site during construction. Since access roads may be used by Mojave and CalPortland construction crews, Mojave will collaborate with CalPortland to mitigate fugitive dust emissions. Note that hydrostatic testing will not be required for any of Mojave's project-related activities.

Response prepared by or under the supervision of:

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9. Identify the maximum depth of excavation/disturbance required for Project construction, as well as the anticipated depth to shallow groundwater.

Response:

Mojave confirms that the maximum depth of excavation will be four (4) feet or less for the foundation of the monitoring equipment or communications antenna. There is no shallow groundwater in the project area; depth to groundwater is estimated to occur at approximately fifty (50) feet below the surface in the Project area.

Response prepared by or under the supervision of:

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10. Identify all water supply wells, including private, community, irrigation, livestock, and municipal/public wells, and springs within 150 feet of the Project workspace.

Response:

Mojave confirms that there are no water supply wells, including private, community, irrigation, livestock, and municipal/public wells, and springs located within 150 feet of the Project workspace.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
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11. Identify if the Project area overlies wellhead protection areas.

Response:

Mojave confirms that there are no wellhead protection areas in the Project area.

Response prepared by or under the supervision of:

Blake Amos  
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MOJAVE PIPELINE COMPANY, L.L.C.  
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12. Clarify if there are known areas of existing soil or groundwater contamination within 0.25 mile of any Project disturbance. Identify and describe any such sites, as well as the status of remediation efforts, and provide the source of the information. State and local databases should be consulted in addition to U.S. Environmental Protection Agency resources. If there is a potential for the Project to disturb areas of existing contamination, describe how Mojave would minimize impacts and prevent the spread of existing contamination.

Response:

Mojave confirms that the Project site is not located within 0.25 miles of any known areas with existing soil or groundwater contamination. Mojave made this determination using the database resources listed below.

**Sources:**

EDR Database Search Report dated June 10, 2021 and

California Department of Conservation. 2021a. Geologic Energy Management Division (CalGEM, formerly DOGGR) Online Mapping Application, Well Statewide Tracking and Reporting System (WellSTAR) Well Finder. Available at: <https://www.conservation.ca.gov/calgem/Pages/Wellfinder.aspx>. Accessed June 2021.

———. 2021b. Mines Online. Available at: <https://maps.conservation.ca.gov/mol/index.html>. Accessed June 2021.

California Department of Toxic Substances Control. 2021. EnviroStor website. Available at: <http://www.envirostor.dtsc.ca.gov/public/>. Accessed June 2021.

California Department of Water Resources. 2021. Well Completion Report Map Application. Available at: <https://dwr.maps.arcgis.com/apps/webappviewer/index.html?id=181078580a214c0986e2da28f8623b37>. Accessed June 2021.

California State Water Resources Control Board. 2021. GeoTracker website. Available at: <http://geotracker.waterboards.ca.gov/>. Accessed June 2021.

Pipeline Safety Trust. 2021. Pipeline Failures, Incident Maps by State. Available at: <http://pstrust.org/maps/index.php>. Accessed June 2021.

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U.S. Department of Transportation. 2021. Pipeline and Hazardous Materials Safety Administration, National Pipeline Mapping System (NPMS) Public Viewer. Available at: <https://pvnpm.phmsa.dot.gov/PublicViewer/>. Accessed June 2021.

Response prepared by or under the supervision of:

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**Resource Report 3**

13. Provide quantitative impacts on vegetation affected by construction and operation of the Project.

Response:

There will be no vegetation affected by the activation of Mojave's delivery tap since all the work for the tap will occur within an existing graveled fenced-in location. Since installation of the EGM and communication antenna equipment will be installed within a meter station site to be constructed by CalPortland, Mojave will not be disturbing any vegetation.

Response prepared by or under the supervision of:

Blake Amos  
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14. Appendix B California Natural Diversity Database and California Native Society Database search discusses occurrence potential for special-status plants and wildlife in the Project area. Provide copies of correspondence with the State of California regarding state-listed endangered and threatened species in the vicinity of the proposed Project area.

Response:

Mojave initiated consultation with the California Department of Fish and Wildlife (“CDFW”) on March 29, 2021 regarding the Mojave ground squirrel. On July 6, 2021, Mojave contacted CDFW regarding review of all other state-listed endangered and threatened species in the vicinity of the proposed Project area. To date, the CDFW has not responded to Mojave’s consultation request. Mojave has attached behind this response a summary of correspondence with CDFW and copies of correspondence with the CDFW.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

## CDFW Correspondence Regarding Oak Creek Project

### Mojave Ground Squirrel Correspondence

Initial correspondence was via phone in March 2021 between Mojave Ground Squirrel (MGS) Biological Kathryn Simon and Jaimie Marquez at CDFW to confirm trapping for MGS was not required for the project and that there would be no impact to the species. Email correspondence was as followed in March 2021:

- March 29, 2021 CDFW (Jaimie Marquez) confirms the project falls outside the 5 mile barrier of range map for MGS
- March 30, 2021 Kathryn Simon confirms no trapping for MGS is required for the project
- April 1, 2021 CDFW (Jaimie Marquez) requests confirmation of assessment for MGS at the site
  - Kathryn Simon responds with assessment
  - CDFW (Jaimie Marquez) responds with thank you and good luck

### Project Correspondence

Renewed correspondence was initiated with CDFW regarding overall approval of project measures on July 1, 2021 via email with biological report attached to Jaime Marquez. Email replies to and from CDFW were sent to remind and continue to request review of project on:

- July 6, 2021 email to CDFW (Jaimie Marquez) asking to confirm receipt of request
- July 7, 2021 reply received from CDFW (Jaimie Marquez) stating the request was received
- July 26, 2021 email to CDFW (Jaimie Marquez) asking if there were questions or concerns regarding project
- August 9, 2021 email to CDFW (Jaimie Marquez) asking again if there were any question or concerns
  - Email received from CDFW (Jaimie Marquez) apologizing and asking for maps/documents
  - Email sent to CDFW (Jaimie Marquez) reattaching the biological report
  - Email from CDFW (Jaimie Marquez) stating comments would be sent by August 13, 2021
- August 23, 2021 email to CDFW (Jaimie Marquez) asking after the comments requested
  - Email from CDFW (Jaimie Marquez) stating there has not been enough time and that the project would be discussed with a supervisor
- August 30, 2021 email to CDFW (Jaimie Marquez) stating that SWCA would be submitting the project to FERC on September 1, 2021 and asking for comments by then.
- October 7, 2021 email to CDFW (Jaimie Marquez) stating that FERC is now asking that we confirm CDFW has no objection to the project
- October 8, 2021 email from CDFW (Jaimie Marquez) apologizing and stating that Jaimie Marquez is looking into it and would have a response soon.
  - Email from Abimael Leon (CDFW FERC Coordinator) stating that the project had been presented to them as FERC and that they would be the coordinator. A project description and scope of work was requested
  - An email was sent to CDFW (Abimael Leon) with biological report attachment.

## Heather Huerta

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**Subject:** RE: MGS Question

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**From:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>

**Date:** Friday, April 2, 2021 at 10:25 AM

**To:** Kathryn Simon <[kebsimon@outlook.com](mailto:kebsimon@outlook.com)>

**Subject:** RE: MGS Question

Thank you and I wish you all luck on your project!

-Jaime

---

**From:** Kathryn Simon <[kebsimon@outlook.com](mailto:kebsimon@outlook.com)>

**Sent:** Thursday, April 1, 2021 5:31 PM

**To:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>

**Subject:** Re: MGS Question

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Thanks Jaime and here's my assessment, based on 30 years of experience with the species.

The Oak Creek Delivery Meter Station Project is less than 5 acres in total area and includes the installation of a new natural gas interconnection facility and associated auxiliary staging areas in Kern County, California. My professional assessment is that the likelihood of Mohave ground squirrel (MGS) presence at this project site is near zero based on:

1. The site is greater than 5 miles from the range boundary presented in the Department's 2019 Conservation Strategy for Mohave Ground Squirrel;
2. No individuals of the species having been found within 10 miles of the site either in recent trapping efforts or historically, despite frequent trapping in the area over the past 10-15 years; and
3. The elevation and position of the site mean that a significant amount of snow is present at the site in most years, a deterrent for a species extremely dependent on warm temperatures.

Just so you have my official opinion for your records!

**Kathryn Simon (she/her)**  
**Principal Biologist and Owner**  
**Sunrise Consulting LLC**

Mailing Address: PO Box 1985, Big Bear Lake, CA 92315

Physical Address: 1653 West Cypress Avenue, Redlands, CA 92373

(909) 289-4649

[kebsimon@outlook.com](mailto:kebsimon@outlook.com)



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**From:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Date:** Thursday, April 1, 2021 at 3:33 PM  
**To:** Kathryn Simon <[kebsimon@outlook.com](mailto:kebsimon@outlook.com)>  
**Subject:** RE: MGS Question

Hi Kathryn

Generally, those are the recommendations for MGS. And yes, the 5-mile buffer from the species distribution map in the Conservation Strategy applies in both cases you summarize. Having not visited the site for this particular project, I will defer to your knowledge of the site and species. In your evaluation, is there potential for the species to be present?

With regard to conducting biological due diligence at any project site, CDFW generally recommends that habitat within and adjacent to a particular project site be evaluated to determine whether or not it is suitable to support a particular species (i.e. habitat assessment). If suitable habitat is present, CDFW then recommends protocol-level surveys be conducted to demonstrate absence or determine presence. If presence is determined and impacts to the species cannot be avoided during project implementation, an Incidental Take Permit is recommended to comply with the California Endangered Species Act.

-Jaime

---

**From:** Kathryn Simon <[kebsimon@outlook.com](mailto:kebsimon@outlook.com)>  
**Sent:** Thursday, April 1, 2021 11:30 AM  
**To:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Subject:** Re: MGS Question

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Good morning Jaime and I sincerely appreciate your help since I know it's hard to track down the right people. At least it is for me!

Let me see if I got the gist of what maybe we could call the "general MGS recommendations" for Kern County – please correct any mistakes I made!

If the project is less than 180 acres or 5 miles linear, trapping required in all appropriate habitat within 5 miles of the CDFW range boundary in the 2019 MGS Conservation Strategy (and of course inside the range boundary). If over 5 miles, trapping recommended if there's appropriate habitat, but not required.

If the project is more than 180 acres or 5 miles linear, then submit a modified trapping protocol for review. I am unclear if the 5 miles from the range limit applies in this case. But I don't have a project like this right now so not too big an issue.

This would be a huge help to know what to do in each case and also probably waste less time on the CDFW side with all the questions from all of us!

Lastly, if this is all correct, can you confirm the following statement in blue since the client for my little project would just feel better knowing this applies directly to them? I am also attaching the map I have of their project in case that helps to get more specific on area since last time I was on the road when we talked.

The Oak Creek Delivery Meter Station Project is less than 5 acres in total area and includes the installation of a new natural gas interconnection facility and associated auxiliary staging areas in Kern County, California. For this project, CDFW recommends trapping for MGS is appropriate habitat exists for this species, but trapping is not required as the project is greater than 5 miles from the range boundary presented in the Department's 2019 Conservation Strategy for Mohave Ground Squirrel.

Again my incredibly sincere thanks –

**Kathryn Simon (she/her)**  
**Principal Biologist and Owner**  
**Sunrise Consulting LLC**

Mailing Address: PO Box 1985, Big Bear Lake, CA 92315  
Physical Address: 1653 West Cypress Avenue, Redlands, CA 92373  
(909) 289-4649  
kebsimon@outlook.com



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**From:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Date:** Tuesday, March 30, 2021 at 10:27 AM  
**To:** Kathryn Simon <[kebsimon@outlook.com](mailto:kebsimon@outlook.com)>  
**Subject:** RE: MGS Question

Of course, also forgot to mention we would also recommend the surveys and if the project area is less than 180 acres or 5 miles in length. If it is larger than those specifications then we would recommend you submit a modified trapping protocol for our review.

Have a great day,  
-Jaime Marquez

---

**From:** Kathryn Simon <[kebsimon@outlook.com](mailto:kebsimon@outlook.com)>  
**Sent:** Monday, March 29, 2021 2:28 PM  
**To:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Subject:** Re: MGS Question

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Thanks so much Jaime – I super appreciate you getting back to me so quickly and talking to me earlier!

**Kathryn Simon (she/her)**  
**Principal Biologist and Owner**  
**Sunrise Consulting LLC**

Mailing Address: PO Box 1985, Big Bear Lake, CA 92315  
Physical Address: 1653 West Cypress Avenue, Redlands, CA 92373  
(909) 289-4649



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**From:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>

**Date:** Monday, March 29, 2021 at 5:26 PM

**To:** [kebsimon@outlook.com](mailto:kebsimon@outlook.com) <[kebsimon@outlook.com](mailto:kebsimon@outlook.com)>

**Subject:** MGS Question

Hello Kathryn,

According to the information we received the project falls outside the 5 mile barrier of the range map for MGS. With this in mind it is not required but if the area has suitable shrub land habitat then it is recommended that surveys be done according to the MGS survey guidelines available on our website.

Thank you for your questions, feel free to contact me in the future if you have any more.

-Jaime Marquez

## Heather Huerta

---

**From:** Marquez, Jaime@Wildlife <Jaime.Marquez@Wildlife.ca.gov>  
**Sent:** Monday, August 23, 2021 11:01 AM  
**To:** Heather Huerta  
**Subject:** RE: Oak Creek Meter Project

**EXTERNAL: This email originated from outside SWCA. Please use caution when replying.**

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Hello Heather,

I apologize for not reaching out, I have not been able to make time to review your document. I will discuss it with my supervisor and ill reach out and let you know what we decide.

-Jaime

---

**From:** Heather Huerta <HHuerta@swca.com>  
**Sent:** Monday, August 23, 2021 10:48 AM  
**To:** Marquez, Jaime@Wildlife <Jaime.Marquez@Wildlife.ca.gov>  
**Subject:** RE: Oak Creek Meter Project

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Good morning Jaime!

Just checking in on this! 😊

Thanks!

**Heather Huerta**  
Natural Resources Team Lead

**SWCA Environmental Consultants**  
51 W Dayton Street  
Pasadena, CA 91105  
P 626.240.0587 ext. 6615 | F 626.240.0607  
C 559.392-8276

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**From:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Sent:** Monday, August 9, 2021 11:32 AM  
**To:** Heather Huerta <[HHuerta@swca.com](mailto:HHuerta@swca.com)>  
**Subject:** RE: Oak Creek Meter Project

**EXTERNAL: This email originated from outside SWCA. Please use caution when replying.**



Hello Heather,

That would be my bad then, thank you for sending it along again. I will endeavor to comment by the end of the week.

Thank you,  
-Jaime Marquez

---

**From:** Heather Huerta <[HHuerta@swca.com](mailto:HHuerta@swca.com)>  
**Sent:** Monday, August 9, 2021 11:30 AM  
**To:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Subject:** RE: Oak Creek Meter Project

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Hi Jaime,

Yep! I attached it with the first email but that was a while ago 😊 Please see attached again!

Thanks!

**Heather Huerta**  
Natural Resources Team Lead

**SWCA Environmental Consultants**  
51 W Dayton Street  
Pasadena, CA 91105  
P 626.240.0587 ext. 6615 | F 626.240.0607  
C 559.392-8276

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**From:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Sent:** Monday, August 9, 2021 11:27 AM  
**To:** Heather Huerta <[HHuerta@swca.com](mailto:HHuerta@swca.com)>  
**Subject:** RE: Oak Creek Meter Project

**EXTERNAL: This email originated from outside SWCA. Please use caution when replying.**

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Hello Heather,

I apologize for the delayed response. I would be glad to take a look into the project but without any maps or documents I cannot make a substantive comment. Does the Project have a CEQA document associated with it? If there is if you could send it and any maps over I would be glad to look at them and provide comments.

-Jaime

---

**From:** Heather Huerta <[HHuerta@swca.com](mailto:HHuerta@swca.com)>  
**Sent:** Monday, August 9, 2021 11:10 AM  
**To:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>  
**Subject:** RE: Oak Creek Meter Project

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Hi Jaime,

I just wanted to check and see if ended up having any questions or comments?

Thanks!

**Heather Huerta**

Natural Resources Team Lead

**SWCA Environmental Consultants**

51 W Dayton Street

Pasadena, CA 91105

P 626.240.0587 ext. 6615 | F 626.240.0607

C 559.392-8276

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**From:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>

**Sent:** Wednesday, July 7, 2021 9:16 AM

**To:** Heather Huerta <[HHuerta@swca.com](mailto:HHuerta@swca.com)>

**Subject:** RE: Oak Creek Meter Project

**EXTERNAL: This email originated from outside SWCA. Please use caution when replying.**

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Hello Heather,

Thank you and yes I have now received this message. I will let you know if I have questions.

-Jaime Marquez

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**From:** Heather Huerta <[HHuerta@swca.com](mailto:HHuerta@swca.com)>

**Sent:** Tuesday, July 6, 2021 8:21 PM

**To:** Marquez, Jaime@Wildlife <[Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)>

**Subject:** RE: Oak Creek Meter Project

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hi Jaime,

Just confirming you received this email!

Thanks!

**Heather Huerta**

Natural Resources Team Lead

**SWCA Environmental Consultants**

51 W Dayton Street

Pasadena, CA 91105

P 626.240.0587 ext. 6615 | F 626.240.0607

**From:** Heather Huerta  
**Sent:** Thursday, July 1, 2021 9:01 AM  
**To:** [Jaime.Marquez@Wildlife.ca.gov](mailto:Jaime.Marquez@Wildlife.ca.gov)  
**Subject:** Oak Creek Meter Project

Hi Jaime Marquez,

I believe you've been in communication with my colleague Kathryn Simon regarding Oak Creek Delivery Meter Station Project and the likelihood of MGS presence on site. We really appreciated your response! I wanted to make sure that CDFW was informed about the project as a whole.

We have been coordinating with Kern County as the lead agency to obtain an Oil and Gas Permit. After review, the County determined that since this is a minor project adding to an existing pipeline, no permit was required. Since this project will be approved under FERC, we wanted to make sure all agencies, including CDFW, were alerted to the Oak Creek scope of work as well as our review of the project area.

Please let us know if you need any information or have any questions. Please let us know that you have received this message!

Thanks!

**Heather Huerta**  
Natural Resources Team Lead

**SWCA Environmental Consultants**  
51 W Dayton Street  
Pasadena, CA 91105  
P 626.240.0587 ext. 6615 | F 626.240.0607  
C 559.392-8276

## Heather Huerta

---

**From:** Heather Huerta  
**Sent:** Friday, October 8, 2021 2:10 PM  
**To:** Leon, Abimael@Wildlife  
**Subject:** RE: Inquiry Re - Oak Creek Delivery Meter Project  
**Attachments:** Oak Creek Meter Project Biological Technical Report\_June 2021.pdf

Good afternoon Abimael,

Please see attached for our bio technical report which outlines the project description and scope of work for this project!

Thanks!

**Heather Huerta**  
Natural Resources Team Lead

**SWCA Environmental Consultants**  
51 W Dayton Street  
Pasadena, CA 91105  
P 626.240.0587 ext. 6615 | F 626.240.0607  
C 559.392-8276

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**From:** Leon, Abimael@Wildlife <Abimael.Leon@wildlife.ca.gov>  
**Sent:** Friday, October 8, 2021 12:46 PM  
**To:** Heather Huerta <HHuerta@swca.com>  
**Subject:** Inquiry Re - Oak Creek Delivery Meter Project

**EXTERNAL: This email originated from outside SWCA. Please use caution when replying.**

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Good afternoon, Heather Huerta.

It was brought to my attention that you have been corresponding with our Department regarding the Oak Creek Delivery Meter Station Project. This project was presented to me as a FERC project, and I serve as the FERC Coordinator for CDFW-Region 4. I understand that you indicated that FERC requested confirmation that CDFW has no objection to the project for all CA listed species. I write to ask if you could provide me with a project description and/or scope of work that could help me evaluate your request and determine if CDFW concurs with your biological review.

Sincerely,

--

**Abimael** (Abi) **León**, Ph.D.

--

Senior Environmental Scientist (Specialist)  
California Department of Fish and Wildlife  
Central Region (Region 4) FERC Coordinator  
Ecosystem Conservation Division  
Habitat Conservation Planning Branch  
Environmental Planning and Review  
1130 East Shaw Avenue,

Fresno, CA 93710

E-mail: [Abimael.Leon@wildlife.ca.gov](mailto:Abimael.Leon@wildlife.ca.gov)

Mobile: 559-580-3199

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MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

15. Section 3.2. states non-native species and/or noxious weed species were observed in the Project area. Clarify preventative measures Mojave would take to mitigate distribution and spread of invasive species.

Response:

Mojave will ensure that all vehicles and equipment brought on site for Mojave's project will be inspected, cleaned (if needed), and certified to be weed-free.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

16. Section 5.1. states Section 1 of the Interim Empty Nest Policy of the FWS, Region 2, states that if an active nest is observed before or during construction, “measures” should be taken to protect the nest from destruction and to avoid a possible violation of the Migratory Bird Treaty Act (MBTA). ***Clarify the measures Mojave would take if an active nest is observed.***

Response:

Should an active nest be observed before or during construction, Mojave will cease construction activities in the area of the nest until the young have fledged and left the nest or the nest becomes inactive. Mojave notes that no nests have been observed in or near the proposed project site.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

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Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

17. Clarify if there are trees present in the Project area that would be impacted by construction of the Project or in the vicinity of the Project area.

Response:

While there are Joshua Trees, a California protected succulent plant species, in the vicinity of the Project area, Mojave confirms that there are no Joshua Trees located in the Project area and no Joshua Trees will be impacted by Mojave's project-related activities.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548



MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

**Resource Report 6**

18. Identify any active and historic surface and subsurface mines within 0.25 mile of the proposed workspace. Include the type of resource mined, the method of extraction (e.g., long-wall, strip mining), and the distance from the nearest Project workspace to the edge of the mine.

Response:

Mojave confirms that there are no hard rock mines within 0.25 mile of the Project area. CalPortland operates a sand and gravel and limestone extraction operation as part of its facilities located approximately 0.39 mile south of the Project area.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

19. If mines are identified within 0.25 mile of the Project, discuss the impacts, if any, on Project components from blasting at mines in the Project vicinity. Provide any mitigation measures that would be used by Mojave.

Response:

Mojave confirms that there is no mining activity using blasting within 0.25 miles of the Project.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

20. Describe existing and potential geological hazards that could affect the Project during construction and operation, including: the seismic hazard potential for the Project area; proximity to active faults and faults with surface expression; Project susceptibility to soil liquefaction; karst terrain and areas of potential ground failure; and regional subsidence from groundwater extraction.

Response:

General and site-specific impacts and mitigation for the Project site are provided under the following categories:

**Volcanism** - No volcanic hazards have been identified, and no impacts on Project facilities from volcanic activity are expected.

**Earthquakes and Active Faults** - The Project site is not in an area of high risk of an earthquake hazard zone based on fault rupture, liquefaction, or earthquake-induced landslides (California Department of Conservation 2021).

**Slope Stability/Landslides** - Topographic relief within the Project area is low, with a maximum slope of less than 2 percent. No areas susceptible to landslides are present in the project area.

**Regional Subsidence from Groundwater Extraction** - Groundwater withdrawal has not caused ground subsidence near the project area. The project is not likely to be affected by subsidence events or increase the likelihood of subsidence events.

**Karst Terrain and Areas of Potential Ground Failure** - There are no karst features or karst topography near the project area. Therefore, there is no potential for ground failure from karst terrain.

**Soil Liquefaction** - The Project station site is in an area with very low potential for liquefaction. Project area soils are excessively well-drained; water-saturated sediments are unlikely to be present; and the potential for seismically induced ground motion is low; therefore, impacts associated with soil liquefaction are not anticipated.

**Expansive Soils** - The NRCS Web Soil Survey suggests expansive soils will not be encountered within the project area.

**Flooding** - The Project is in an area of minimal flood risk, identified as Zone X by FEMA. The Project design will conform with planning ordinances and best management practices in structure construction, installation of electrical components, installation of operational equipment, and anchorage of components. No impacts from high-velocity flows, or debris, are anticipated.

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Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

**Other Hazards** - Extreme weather conditions associated with climate change are unlikely to present a direct hazard to the Project, with the possible exception of wildfire. Fire risk will be mitigated by maintaining a cleared area around the proposed facilities.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

21. Identify the location, date, and magnitude for earthquakes within 10 miles of the Project area.

Response:

Mojave confirms that several small (magnitude less than 5.0) earthquakes have occurred within 100 miles of the Project site in the last 365 days (Earthquake Track 2021). No large (magnitude 5.0 or greater) earthquakes have occurred within 100 miles of the Project site in the last 365 days (Earthquake Track 2021)

Based on historical records, Mojave, California, has had a total of 2,508 measurable earthquakes since 1931 (Homefacts 2021). The largest earthquake recorded in the region (magnitude 5.3) was the 1992 California City Earthquake. The epicenter of the 1992 earthquake was 25 miles east of the Project site.

**Source:**

Homefacts. 2021. Website: Earthquake Information for Mojave California. Available at: <https://www.homefacts.com/earthquakes/California/Kern-County/Mojave.html>. Accessed August 2021

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

22. Describe how the Project has been sited or designed to avoid or minimize adverse impacts from geologic hazards, including any monitoring that Mojave would conduct before, during, and after construction.

Response:

Mojave confirms that the Project site is not in a high risk earthquake hazard zone based on fault rupture, liquefaction, or earthquake-induced landslides (California Department of Conservation 2021). Therefore, no construction or operation impacts are anticipated from seismic events. Mojave notes that earthquake hazards were not a controlling factor in its facility design. Further, Mojave is not planning any seismic monitoring before, during or after construction of its project.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

23. Describe if blasting is anticipated to be required for Project construction, and if so, file Project-specific blasting procedures in accordance with the FERC Plan at section III.F.4.

Response:

Mojave confirms that blasting will not be required for Project construction.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

**Resource Report 7**

24. Describe any consultations with state or local soil conservation authorities with regard to recommendations for seed mixes, seeding dates, erosion controls, invasive controls, etc.

Response:

Given the limited scope of Mojave's required project-related activities, i.e., work within an existing tap location and construction within CalPortland's meter station site, re-seeding, erosion controls, or invasive controls beyond those described in response to Question 15 will not be required. Mojave's existing fenced-in area for its new delivery point will be graveled. Similarly, Mojave understands that the CalPortland meter station site will be graveled as well. Based on this, Mojave did not consult with state or local soil conservation authorities with regard to recommendations for seed mixes, seeding dates, erosion controls, invasive controls, etc.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548



MOJAVE PIPELINE COMPANY, L.L.C.  
 Response to OEP Data Request  
 Dated October 7, 2021 in Docket No. CP21-495-000  
 Oak Creek Delivery Point

**Resource Report 8**

25. Provide land use impacts and project acreages that would be affected by construction and operation of the Project as generally discussed under Resource Report 8. Characterize and quantify affected land and discuss special construction techniques or other forms of mitigation that would be used to reduce impact during construction and operation of the facilities.

Response:

CalPortland currently owns the parcel of land on which the Project is proposed to be located. As noted in Mojave’s Data Request Response No. 5, with the addition of the access roads, the total acres of land affected by construction and operation of the Project is up to a maximum of 1.45 acres of land. Disturbance acreages for construction (temporary and permanent) and operational (permanent) land requirements for the Project are summarized by proposed action, along with approximate dimensions, in Table 1. Land requirements for operations and maintenance activities of Project constructed features are anticipated to remain within the existing footprint of CalPortland’s private property. Access to the construction work areas will be via an existing paved public road (Oak Creek Road), a graveled private road, and an existing dirt road; no modifications to the existing public or private roads are expected.

**SUMMARY TABLE OF LAND REQUIREMENTS BY ACREAGE**

PROJECT COMPONENT	ACREAGE TEMPORARILY AFFECTED BY CONSTRUCTION (ACRE)	ACREAGE PERMANENTLY AFFECTED BY OPERATIONS (ACRE) OF THE MODIFICATIONS
Contractor staging and workspace	0.50	0.0
New and modified facilities	0.16	0.16
Existing tap facilities	0.00* (80 square feet)	0.00* (80 square feet)
Access Roads	0.00** (0.79)	0.0
<b>Total Area</b>	<b>0.66</b>	<b>0.16</b>

\*The existing tap facility is located in a 10 foot by 8 foot fenced area.

\*\*The existing access roads have not been included in acreage affected by construction because no modifications to these roads will be undertaken by Mojave.

**1 Existing Land Use**

Land use described in this section includes land cover types derived from the National Land Cover Database (“NLCD”), and observations made from aerial

MOJAVE PIPELINE COMPANY, L.L.C.  
Response to OEP Data Request  
Dated October 7, 2021 in Docket No. CP21-495-000  
Oak Creek Delivery Point

imagery, GIS technology, and ground-truthing during biological and cultural resource surveys.

There are no designated Coastal Zone Management Areas, registered national natural landmarks (National Park Service 2021a), designated Wilderness Areas (Wilderness Connect 2021), Wild and Scenic Rivers (National Wild and Scenic Rivers System 2021), or designated National Trails (National Park Service 2021b) within 0.25 mile of planned Project activities.

The vegetation community within the project area is best described as California juniper woodland (*Juniperus californica* Woodland Alliance) and California buckwheat scrub (*Eriogonum fasciculatum* Shrubland Alliance). The dominant plant species in the Project site are California buckwheat (*Eriogonum fasciculatum*) and brittlebush (*Encelia farinosa*), which were interspersed with patches of California juniper (*Juniperus californica*). The topography consists of varying slopes at approximately 5 to 10 degree inclines. The soils were predominantly hard-packed sandy loam interspersed with gravel. The project area is highly disturbed with numerous roads crisscrossing throughout the terrain. All paved and unpaved (graded) roads and infrastructure within the Project are classified as developed land cover.

The primary NLCD land cover type for the Project site (Multi-Resolution Land Characteristics Consortium 2021) is classified as mostly “Shrub/scrub”.

A review of Kern County Maps (Kern County 2021) and recent aerial imagery confirmed that there are no orchards, nurseries, specialty crops, conservation lands, lands held in trust, operating mines, remnant prairies, or old-growth forests within 0.25 mile of the Project site. There are no hazardous waste sites or landfills located within 0.25 mile of the Project site (Kern County 2021).

The Project site is located within the Alta Wind Energy Center footprint with wind turbines as close as 188 feet from the project area. Other notable infrastructure in the Project vicinity includes the CalPortland Mojave Plant, a cement plant located approximately 0.36 mile to the south, overhead electric transmission lines, and the Windhub Substation located approximately 1.64 miles to the southeast.

Prior to Mojave’s installation of EGM equipment and antenna, CalPortland will clear and grade the Project site and install its new meter and connection pipe..

## **2 Impacts and Mitigation**

Project-related construction and operational activities (see Table 8-1) would occur at the Project site. This section details Project-related impacts to land use

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during Project construction and operation, as well as planned measures intended to mitigate adverse impacts.

Mojave's construction activities would occur within the planned CalPortland disturbance limits. Therefore, no new temporary land use impacts would occur as a result of Project activities.

Construction of the new delivery point would be located adjacent to an existing inactive tap location on Mojave's system. Because all temporary and permanent project-related activities would occur in areas already permanently converted disturbed land, no measurable impacts would occur to NLCD land cover types from this Project.

### **3 Mitigation**

Although project activities are not anticipated to disturb native vegetation or disturb previously undisturbed areas, Mojave will implement best management practices to avoid, minimize, or mitigate potential impacts to land use and vegetative land cover during construction and operations and maintenance activities. A summary of BMPs that Mojave intends to implement to reduce impacts is given below.

- Work areas will be identified prior to construction to limit impacts to vegetation.
- Temporary erosion controls will be installed prior to and during construction activities.

### **4 Recreation and Public Interest Areas**

Publicly available aerial imagery and GIS data sources, as well as online databases maintained by state, local, and federal agencies, was reviewed to determine the presence of, and potential impacts to, recreational and public interest areas within 0.25 mile of the Project. There are no State- or locally designated trails, nature preserves, national or state forests, national or state parks, golf courses, public or private hunting areas, designated recreational areas, or lands included in or designated for study for inclusion in the National Trails System located within 0.25 mile of the Project site (California Department of Parks and Recreation 2021). Project construction and operational activities would not result in impacts to recreation or public interest areas.

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26. Include a discussion on potential visual impacts and mitigation measures for construction and operation of the Project.

Response:

A discussion on potential visual impacts and mitigation measures for construction and operation of the Project are provided under the following categories:

**1. Existing Visual Character**

Publicly available aerial imagery, local, state, and federal online databases were reviewed to determine the presence of visually sensitive resources in or near the Project site. No wild and scenic rivers, designated scenic areas, designated scenic routes or byways, churches, public parks or recreation areas occur within 0.25 mile of the Project site (California Department of Parks and Rec 2021; Federal Highway Administration 2021; National Wild and Scenic Rivers System 2021). Visual impacts to historic districts, historic properties, or cultural resources sites listed on or eligible for listing in the National Register of Historic Places would not occur and are addressed in detail in Resource Report 4 – Cultural Resources.

The Project is located within the Alta Wind Energy Center footprint with wind turbines as close as 188 feet from the project area. Other notable infrastructure in the Project vicinity includes the CalPortland Mojave Plant, a cement plant located approximately 0.36 mile to the south, overhead electric transmission lines and the Windhub Substation located approximately 1.64 miles to the southeast. There are no residences within 1 mile of the project site and no major highway.

**2. Impacts and Mitigation**

Because Mohave's activities would consist of very few new visually observable components on the Project site, changes in visual character are anticipated to be negligible at the Project site.

The Project would result in short-term impacts to visual character such as views of equipment use and staging, and materials stockpiling. However, these temporary construction activities would be partially hidden from view by existing vegetation. The nearest portion of publicly accessible roadway, where visual impacts could occur, is Oak Creek Road south of the Project site. The only locations along this segment of Oak Creek Road include the CalPortland Mojave Cement Facility and the Windhub Substation. There are no public destinations or recreation opportunities in the nearby area that would draw vehicle or pedestrian traffic. Therefore, localized visual impacts are not anticipated.

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**2.1 Mitigation**

Mojave will implement best management practices at the Project site to avoid, minimize, or mitigate potential negative effects on visual character during construction and operation. These BMPs will include, but are not limited to:

- maintaining the existing vegetative buffer along the Project site boundaries to the extent feasible.
- painting equipment to blend into the existing natural environment as needed.

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**Resource Report 9**

27. Provide quantified emissions of criteria pollutants (NO<sub>x</sub>, VOC, CO, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>), total hazardous air pollutants (HAP) and greenhouse gases (GHG) in tons per year from all construction activities including site grading, excavation, trenching, filling, delivery vehicles, fugitive dust, clean/pigging activities, and tailpipe emissions from all construction equipment. Provide a break-down of the emissions by calendar year demonstrating when the construction emissions would likely occur. Include supporting calculations, emission factors, fuel consumption rates, vehicle power ratings, utilization rates, and hours of operation.

Response:

**1 Construction Emissions**

Air emissions associated with construction of the Project will include emissions from fossil-fueled construction equipment and fugitive emissions such as dust.

Construction-related emissions of criteria pollutants and greenhouse gases have been estimated for the Project. Table 2 provides a summary of estimated emissions from construction activities. Mojave is also providing detailed construction emissions calculations along with the methodology and emissions factors, as Appendix A, behind this response.

Construction activities for the Project will result in emissions of fugitive dust from vehicular traffic and soil disturbance, and combustion emissions from diesel and gasoline fired construction equipment and vehicles used by construction workers to commute to and from work sites during construction.

Construction of the proposed Project is anticipated to begin in late November 2021 and persist for a total of approximately two (2) months with operational commissioning the beginning of 2022. Construction activities would be conducted in accordance with EKAPCD Rule rules and regulations to prevent the occurrence of unwarranted fugitive dust emissions and public nuisances.

All air pollutant emissions associated with construction activities would cease upon completion of the project, and its implementation would not introduce a long-term source of air pollutant emissions to the project area.

Air quality impacts from the Project construction will generally be temporary, localized, and not substantial. Construction equipment and other mobile sources may be powered by diesel or gasoline engines and are sources of combustion-related emissions including NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, GHG, and small quantities of HAPs. Nevertheless, the estimated air emissions from

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construction of the Project are expected to be transient in nature, with negligible impact on the regional air quality.

The emission calculations use emission factors for construction and maintenance equipment that were developed by California's South Coast Air Quality Management District (SCAQMD) to calculate construction worker commute and on-road construction equipment emissions (South Coast Air Quality Management District 2007a; 2007b). For off-road equipment, the appropriate emission factor, equipment type, quantity of equipment needed, and duration of use during construction of the project were used in determining emissions from construction equipment. The estimated maximum number of construction workers were assumed to commute from within eastern Kern County, an average of 9 miles (one-way) to the project area. Construction activities for the Project are anticipated to require a small workforce of approximately 8 people, or 16 total daily trips. The material and equipment were assumed to be sourced from Mojave, California, with an average driving distance 9 miles from the project site.

The emissions of PM10 and PM2.5 estimated include emissions from on-road vehicle and off-road equipment exhaust in addition to fugitive dust. Mojave will not clear vegetation or grade the site of the bus stop or the conduit for the electrical connection to the meter as CalPortland will complete this work during its installation of the meter. Therefore, construction does not include any earthmoving activities.

**TABLE 2 NON-ROAD, ON-ROAD, AND FUGITIVE DUST CONSTRUCTION EMISSIONS OF CRITERIA POLLUTANTS, HAPS, & GHG (TPY)**

SOURCE	TOTAL PROJECT EMISSIONS (TONS PER YEAR)							
	CO	NO <sub>x</sub>	VOC	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2e</sub> *	HAPs
Construction Equipment (Off-Road)	0.12	0.08	0.02	<0.01	<0.01	<0.01	26	<0.01
Worker and On-Road Construction Equipment Commuting	0.02	0.02	<0.01	<0.01	0.04	0.01	8	<0.01
<b>Total</b>	<b>0.14</b>	<b>0.09</b>	<b>0.02</b>	<b>&lt;0.00</b>	<b>0.04</b>	<b>0.01</b>	<b>35</b>	<b>&lt;0.00</b>
EKAPCD Air Quality Significance Thresholds**	<b>NA</b>	<b>25</b>	<b>25</b>	<b>27</b>	<b>15</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>

\*CO<sub>2e</sub> is calculated with CO<sub>2</sub>, Methane, and Nitrous Oxide multiplied by the high-end 100-year Global warming potential values from IPCC's Fifth Assessment Report. GWP values used are 1 for CO<sub>2</sub>, 28 for Methane, and 265 for N<sub>2</sub>O to determine the emissions

\*\*The EKAPCD has not established Air Quality Significance Thresholds for CO, PM<sub>2.5</sub>, CO<sub>2e</sub> or HAPs

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**Oak Creek Delivery Meter Station Project  
Air Resources  
Emission Calculations  
Construction and Operational Emissions Summary**

**Annual Construction Emissions Summary**

Construction Emission Source	Emissions, tpy							CO <sub>2</sub> e Emissions, mtpy	
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	HAPs	(100-year)	(20-year)
Construction Equipment (Off-Road)	0.12	0.08	0.00	0.00	0.00	0.02	0.00	26	26
Worker and On-Road Construction Equipment Commuting	0.02	0.02	0.00	0.04	0.01	0.00	0.00	8	8
<b>Total:</b>	<b>0.14</b>	<b>0.09</b>	<b>0.00</b>	<b>0.04</b>	<b>0.01</b>	<b>0.02</b>	<b>0.00</b>	<b>35</b>	<b>35</b>

**Annual Operational Emissions Summary**

Operational Emission Source	Emissions, tpy							CO <sub>2</sub> e Emissions, mtpy	
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	HAPs	(100-year)	(20-year)
Maintenance/Inspection Activities	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.2	0.2
<b>Total:</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.2</b>	<b>0.2</b>



**Oak Creek Delivery Meter Station Project  
Air Resources  
Emission Calculations  
County Emission Inventory Comparison to Proposed Action Emissions**

**Construction Emissions - Percent of County Inventory**

Emissions Source	Emissions, tpy							CO <sub>2</sub> e Emissions, mtpy	
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	HAPs	(100-year)	(20-year)
Construction Emissions	0.14	0.09	0.00	0.04	0.01	0.02	0.00	35	35
EKAPCD Air Quality Significance Thresholds*	N/A	25.00	27.00	15.00	N/A	25.00	N/A	N/A	

\*The EKAPCD has not established Air Quality Significance Thresholds for CO, PM<sub>2.5</sub>, CO<sub>2</sub>e or HAPs

**Operational Emissions - Percent of County Inventory**

Emissions Source	Emissions, tpy							CO <sub>2</sub> e Emissions, mtpy	
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	HAPs	(100-year)	(20-year)
Operational Emissions	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.2	0.2
EKAPCD Air Quality Significance Thresholds*	N/A	25.00	27.00	15.00	N/A	25.00	N/A	N/A	

**Oak Creek Delivery Meter Station Project**  
**Air Resources**  
**Emission Calculations**  
**Construction Emissions: Equipment Emissions**

**South Coast Air Quality Management District - Off-Road Model Mobile Source Emission Factors - 2022 Fleet Average (pounds/hour)**

Equipment	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM / PM <sub>10</sub>	ROG / VOC	CH <sub>4</sub>	CO <sub>2</sub>
Aerial Lifts Composite	0.1667	0.1619	0.0004	0.0071	0.0222	0.0020	34.7
Air Compressors Composite	0.3041	0.2677	0.0007	0.0138	0.0414	0.0037	63.6
Bore/Drill Rigs Composite	0.5007	0.3059	0.0017	0.0048	0.0446	0.0040	165
Cement and Mortar Mixers Composite	0.0414	0.0535	0.0001	0.0021	0.0085	0.0008	7.2
Concrete/Industrial Saws Composite	0.3743	0.2962	0.0007	0.0148	0.0411	0.0037	58.5
Cranes Composite	0.3822	0.5505	0.0014	0.0203	0.0798	0.0072	129
Crawler Tractors Composite	0.5163	0.5746	0.0013	0.0310	0.0931	0.0084	114
Crushing/Proc. Equipment Composite	0.6208	0.4911	0.0015	0.0234	0.0820	0.0074	132
Dumpers/Tenders Composite	0.0314	0.0581	0.0001	0.0022	0.0092	0.0008	7.6
Excavators Composite	0.5104	0.3171	0.0013	0.0136	0.0648	0.0059	120
Forklifts Composite	0.2146	0.1265	0.0006	0.0044	0.0274	0.0025	54.4
Generator Sets Composite	0.2694	0.2783	0.0007	0.0117	0.0340	0.0031	61.0
Graders Composite	0.5732	0.4657	0.0015	0.0218	0.0807	0.0073	133
Off-Highway Tractors Composite	0.6320	0.9188	0.0017	0.0424	0.1322	0.0119	151
Off-Highway Trucks Composite	0.5447	0.6574	0.0027	0.0216	0.1303	0.0118	260
Other Construction Equipment Composite	0.3488	0.2785	0.0013	0.0106	0.0507	0.0046	123
Other General Industrial Equipment Composite	0.4464	0.5301	0.0016	0.0199	0.0867	0.0078	152
Other Material Handling Equipment Composite	0.4378	0.5158	0.0015	0.0191	0.0813	0.0073	141
Pavers Composite	0.4840	0.4750	0.0009	0.0296	0.0870	0.0078	77.9
Paving Equipment Composite	0.4042	0.4137	0.0008	0.0261	0.0666	0.0060	68.9
Plate Compactors Composite	0.0263	0.0314	0.0001	0.0012	0.0050	0.0005	4.3
Pressure Washers Composite	0.0539	0.0606	0.0001	0.0024	0.0075	0.0007	9.4
Pumps Composite	0.2640	0.2467	0.0006	0.0114	0.0322	0.0029	49.6
Rollers Composite	0.3799	0.3198	0.0008	0.0181	0.0500	0.0045	67.0
Rough Terrain Forklifts Composite	0.4445	0.2924	0.0008	0.0148	0.0467	0.0042	70.3
Rubber Tired Dozers Composite	0.7353	1.3612	0.0025	0.0536	0.1919	0.0173	239
Rubber Tired Loaders Composite	0.4359	0.3849	0.0012	0.0181	0.0661	0.0060	109
Scrapers Composite	0.7579	1.1177	0.0027	0.0447	0.1724	0.0156	262
Signal Boards Composite	0.0910	0.0818	0.0002	0.0036	0.0121	0.0011	16.7
Skid Steer Loaders Composite	0.2114	0.1485	0.0004	0.0034	0.0204	0.0018	30.3
Surfacing Equipment Composite	0.3778	0.5368	0.0017	0.0195	0.0739	0.0067	166
Sweepers/Scrubbers Composite	0.4867	0.2947	0.0009	0.0124	0.0498	0.0045	78.5
Tractors/Loaders/Backhoes Composite	0.3599	0.2302	0.0008	0.0095	0.0384	0.0035	66.8
Trenchers Composite	0.4186	0.4094	0.0007	0.0284	0.0819	0.0074	58.7
Welders Composite	0.1773	0.1557	0.0003	0.0078	0.0260	0.0023	25.6

Global Warming Potentials	100-year	20-year
CO <sub>2</sub>	1	1
CH <sub>4</sub>	28	84
N <sub>2</sub> O	265	264

Global warming potentials are based on Box 3.2 from the IPCC AR5 Climate Change 2014 Summary Report. Available online at: [https://www.ipcc.ch/site/assets/uploads/2018/02/SYR\\_AR5\\_FINAL\\_full.pdf](https://www.ipcc.ch/site/assets/uploads/2018/02/SYR_AR5_FINAL_full.pdf). Accessed 6/7/2021.

Note: Available at <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors>. All PM is assumed to be equal to PM<sub>10</sub>. All ROG is assumed to be equal to all VOC.

**Oak Creek Delivery Meter Station Project  
Air Resources  
Emission Calculations  
Construction Emissions: Equipment Emissions**

**Off-Road Mobile Source Emissions**

Construction Timeframe	Equipment Type	Mapped SCAQMD Equipment Category	Quantity	Hours per Day	Days of Use	Total Cumulative Hours of Use	Emissions, tpy								CO <sub>2</sub> e Emissions, mtpy		
							CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	HAPs	CH <sub>4</sub>	CO <sub>2</sub>	(100-year)	(20-year)
Construction	Excavator	Excavators Composite	1	10	48	480	0.12	0.08	0.00	0.00	0.00	0.02	0.00	0.00	28.70	26.07	26.14
<b>Total:</b>							<b>0.12</b>	<b>0.08</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.02</b>	<b>0.00</b>	<b>0.00</b>	<b>28.70</b>	<b>26.07</b>	<b>26.14</b>

Note: The Equipment Type is 'mapped' to the appropriate SCAQMD equipment category in order to determine the emission factor for estimating emissions. PM<sub>2.5</sub> is assumed to be equal to 89% of PM<sub>10</sub> emissions (SCAQMD derived default ratio for estimating PM<sub>2.5</sub>). HAPs are assumed to be equal to 10% of VOC emissions. Emissions of CO<sub>2</sub>e include CH<sub>4</sub> and CO<sub>2</sub> emissions; they are not in addition to those emissions.

Note: Assumed a 6-day work week.

Example Calculation: [ Emission Factor, lb/hour ] \* [ Total vehicle hours used per day, hours/day ] \* [ Total days of construction, days/project ] \* [ 1 ton / 2000 lb ] = Tons of pollutant for duration of project

**Oak Creek Delivery Meter Station Project**  
**Air Resources**  
**Emission Calculations**  
**On-Road Vehicle Emissions: Construction Worker Commuting and Equipment/Material Delivery**

**Total Project On-Road Vehicle Emissions**

Construction Timeframe	Vehicle Type	Class	Quantity	Days Used	Commuting/Material Delivery Miles			Commuting/Material Delivery Miles		
					Paved			Unpaved		
					Commuting Miles (Round Trip)	Total Miles per Day	Total Miles for Project	Commuting Miles (Round Trip)	Total Miles per Day	Total Miles for Project
Construction - Workers	Worker Pickup	Passenger	8	48	17.78	142	6,828	0.22	1.76	84
Construction - Hydrovac Truck	Hydrovac Truck	HHDT	1	48	17.78	18	853	0.22	0.22	11
Construction - Delivery Truck for Bus Stop	Delivery Truck	Delivery	1	48	17.78	18	853	0.22	0.22	11
Construction - Concrete Truck	Concrete Truck	Concrete	1	48	17.78	18	853	0.22	0.22	11

Notes: Workers were assumed to commute from Mojave, CA, 1 person per vehicle. Estimated 8.89 paved miles from Mojave, CA on Oak Creek Road and 0.11 unpaved miles from paved Oak Creek Road to staging area. Construction vehicles were assumed to commute from Mojave, CA. Distances to the project site estimated using Google Maps. 6-day work week

**SCAQMD EMFAC 2007 On-Road Emission Factors (lb./mile)**

2022	CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>	CH <sub>4</sub>
Passenger	0.00397866	0.00035150	0.00048658	0.00001072	0.00009661	0.00006389	1.11019931	0.00004121
HHDT	0.00478830	0.01098794	0.00096142	0.00004106	0.00096827	0.00080404	4.21520828	0.00004448

Note: SCAQMD EMFAC 2007 (v2.3) Emission Factors can be found at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-\(v2-3\)-emission-factors-\(on-road\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road)). SCAQMD EMFAC 2007 (v2.3) Emission Factors for scenario year 2022 (all vehicle model years in the range from 1978 to 2022) were used. Emissions from the concrete truck, delivery truck and hydrovac truck used the HHDT emission factors.

**Emission Factors for Fugitive Dust from Roads, lb/VMT**

Source	PM <sub>10</sub>	PM <sub>2.5</sub>
Unpaved Roads Emission Factors for Passenger Vehicles	0.24	0.02
Unpaved Roads Emission Factors for Delivery Vehicles	0.49	0.05
Unpaved Roads Emission Factors for HHDT Vehicles	0.68	0.07
Unpaved Roads Emission Factors for Concrete Trucks	0.81	0.08
Paved Roads Emission Factors for Passenger Vehicles	0.00	0.00
Paved Roads Emission Factors for Delivery Vehicles	0.00	0.00
Paved Roads Emission Factors for HHDT Vehicles	0.01	0.00
Paved Roads Emission Factors for Concrete Trucks	0.01	0.00

**On-Road Vehicle Emissions - Annual**

Type	Vehicle Type	Total Miles	Emissions, tpy								CO <sub>2</sub> e Emission (100-year)	
			CO	NO <sub>x</sub>	ROG	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>	CH <sub>4</sub>		
Construction Worker Commute	Passenger	6,912	0.01	0.00	0.00	0.00	0.00	0.00	0.00	3.84	0.00	3.48
Fugitive Dust From Paved Roads	Passenger	6,828	-	-	-	-	0.00	0.00	0.00	-	-	-
Fugitive Dust From Unpaved Roads	Passenger	84	-	-	-	-	0.01	0.00	0.00	-	-	-
Hydrovac Vehicle	HHDT	864	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.82	0.00	1.65
Fugitive Dust From Paved Roads	HHDT	853	-	-	-	-	0.00	0.00	0.00	-	-	-
Fugitive Dust From Unpaved Roads	HHDT	11	-	-	-	-	0.00	0.00	0.00	-	-	-
Delivery Truck Vehicles	Delivery	864	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.82	0.00	1.65
Fugitive Dust From Paved Roads	Delivery	853	-	-	-	-	0.00	0.00	0.00	-	-	-
Fugitive Dust From Unpaved Roads	Delivery	11	-	-	-	-	0.00	0.00	0.00	-	-	-
Concrete Truck	Concrete	864	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.82	0.00	1.65
Fugitive Dust From Paved Roads	Concrete	853	-	-	-	-	0.01	0.00	0.00	-	-	-
Fugitive Dust From Unpaved Roads	Concrete	11	-	-	-	-	0.00	0.00	0.00	-	-	-
<b>Total:</b>			<b>0.02</b>	<b>0.02</b>	<b>0.00</b>	<b>0.00</b>	<b>0.04</b>	<b>0.01</b>	<b>0.01</b>	<b>9.30</b>	<b>0.00</b>	<b>8.44</b>

**Oak Creek Delivery Meter Station Project**  
**Air Resources**  
**Emission Calculations**  
**Operational Emissions: Inspection and Maintenance Emissions**

**Emission Factors for On-Road Passenger Vehicles, in Pounds per Mile**

Vehicle Type	On-Road SCAQMD Emission Factors								Fugitive Dust from Unpaved Roads		Fugitive Dust from Paved Roads	
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	CH <sub>4</sub>	CO <sub>2</sub>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>
Passenger Vehicles	0.00397866	0.00035150	0.00001072	0.00009661	0.00006389	0.00048658	0.00004121	1.11019931	0.24	0.02	0.00	0.00

Note: SCAQMD EMFAC 2007 (v2.3) Emission Factors can be found at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-\(v2-3\)-emission-factors-\(on-road\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road)). SCAQMD EMFAC 2007 (v2.3) Emission Factors for scenario year 2022 (all vehicle model years in the range from 1978 to 2022) was used).

<sup>1</sup> Fugitive dust from paved and unpaved road emission factors estimated using AP-42 Section 13.2.1 & Section 13.2.2. Mean vehicle weight was conservatively estimated at 2 tons for passenger vehicles.

**Inspection and Maintenance Activity Assumptions**

Parameter	Value	Source / Notes
Number of Site Visits per Year	12	<i>Estimated</i>
Total On-Road Miles, Round-Trip	18	<i>Anticipated commute distance from Mojave, CA is 9 miles one-way, 0.11 miles of which are unpaved.</i>
Total On-Road Miles, Round-Trip, Per Year	216	<i>Number of Site Visits per Year x Total On-Road Miles, Round-Trip</i>
Off-Road Distance Traveled Round-Trip	7	<i>Estimated</i>
Total Off-Road Miles Traveled per Year	84	<i>Off-Road Distance Traveled Round-Trip x Number of Site Visits per Year = Total Off-Road Miles Traveled per Year</i>
Total On- and Off-Road Vehicle Miles Traveled per Round-Trip	25	<i>Total On-Road Miles, Round-Trip + Off-Road Distance Traveled Round-Trip</i>
Total On- and Off-Road Vehicle Miles Traveled per Year	300	<i>Total On-Road Miles, Round-Trip, Per Year + Total Off-Road Miles Traveled per Year</i>

**Annual Emissions From Inspection and Maintenance Activities using On-Road Passenger Vehicles, in Tons per Year**

Vehicle Type	Emissions, tpy									CO <sub>2</sub> e Emissions, mtpy	
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	HAPs	CH <sub>4</sub>	CO <sub>2</sub>	(100-year)	(20-year)
On-Road Passenger Vehicles	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.17	0.15	0.15
Fugitive Dust from Paved Roads	-	-	-	0.00	0.00	-	-	-	-	-	-
Fugitive Dust from Unpaved Roads	-	-	-	0.01	0.00	-	-	-	-	-	-
<b>Total Inspection and Maintenance Activity Emissions</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.17</b>	<b>0.15</b>	<b>0.15</b>

Example Calculation: [ Emission Factor, lb/mile ] \* [ Total vehicle miles traveled per year, miles/year ] \* [ 1 ton / 2,000 lb ] = Tons of pollutant per year

Note: HAPs are assumed to be equal to 10% of VOC emissions.

MOJAVE PIPELINE COMPANY, L.L.C.  
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28. Indicate any equipment, procedures, or measures that Mojave would commit to implement to mitigate exhaust emissions from construction equipment. These may include: idling restrictions, use of low-sulfur fuel, commitment to use newer tier equipment, installation of controls on temporary stationary equipment, etc.

Response:

Table 2 (depicted in the previous response), shows that construction of the proposed Project would not exceed applicable annual or daily EKAPCD significance thresholds, respectively. Therefore, the proposed Project would result in a less-than-significant impacted related to construction's conflict with or obstruct implementation of air quality plans. Given the minor nature of its project, Mojave will encourage its contractors to limit idling of diesel powered equipment.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

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29. Identify any procedures which Mojave would use to mitigate fugitive dust emissions.

Response:

Fugitive dust emissions are anticipated to be minimal resulting from Mojave's minor work at the existing fenced in tap site and the installation of electronic gas measurement/gas quality monitoring equipment and a communication antenna within the fenced-in parameters of the future CalPortland meter station. Mojave notes that the project area is below the size threshold for a Kern County Fugitive Dust Control Permit. Mojave will monitor fugitive dust emissions and mitigate as needed by using water trucks, limiting the speed of vehicles at the construction site, and properly maintaining construction equipment to reduce emissions.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548

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30. Provide the anticipated construction schedule and identify the typical hours and days of construction (example: 7:00 am to 7:00 pm, Monday-Friday). Indicate if construction would take place on weekends and federal holidays. Additionally, provide a detailed list of all activities that may occur during any nighttime construction.

Response:

Mojave anticipates that construction activities would occur up to ten (10) hours per day (7:00 am to 5:00 pm), six (6) days per week for approximately two (2) months. Barring any unforeseen circumstances, Mojave is not planning any nighttime construction activities.

Response prepared by or under the supervision of:

Blake Amos  
Mojave Environmental Project Manager  
205-325-3548



## Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing documents to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 18<sup>th</sup> day of October 2021.

/s/

\_\_\_\_\_  
Francisco Tarin

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