



August 24, 2026

Via Email Only

Sean Curtis, Planning Director
Modoc County Planning Department
203 W 4th St.
Alturas, CA 96101
seancurtis@co.modoc.ca.us

Re: Surprise Valley Geothermal Exploration - Draft Initial Study/Mitigated Negative Declaration (ISMND), SCH# 2026061281

Dear Mr. Curtis,

The California Department of Conservation, Geologic Energy Management Division (CalGEM) thanks you for the opportunity to provide comments and recommendations on the Draft Initial Study/Mitigated Negative Declaration (ISMND) for the Surprise Valley Geothermal Exploration Project (Project).

CalGEM Authority

CalGEM is submitting comments as a Responsible Agency under the California Environmental Quality Act (CEQA). (Public Resources Code [PRC], § 21069; California Code of Regulations [CCR], Title 14, §§ 15096, 15381.) CalGEM, in its capacity as a Responsible Agency, has jurisdiction over the drilling, operation, maintenance and abandonment of geothermal wells. (PRC, § 3714.) Upon the project applicant submitting a Notice of Intent (NOI) seeking from CalGEM permits to drill the proposed wells to implement the proposed project, CalGEM will make its own determination if this ISMND complies with CEQA. Additionally, any person wishing to develop geothermal energy with geothermal wells must comply with requirements stated in Chapter 4 of Division 3 of the PRC and Title 14 of the CCR, including but not limited to bonding, notification, drilling, reworking, operation, abandonment, and permitting requirements.

Project Description Summary

The Surprise Valley Geothermal Exploration Project, as described in the ISMND, will be located within the Surprise Valley region of Modoc County and would disturb approximately 39.5 acres of privately owned land. The project applicant, Ormat Surprise Valley LLC (Ormat), proposes to develop up to eleven geothermal exploratory/test wells on nine well pads southwest of Upper Alkali Lake, 1.85 miles north of Lake City, 11.5 miles south of Fort Bidwell, and 10.25 miles west of the Nevada and

California border, for purposes of characterizing and evaluating the geothermal resource for potential commercial energy generation.

The proposed facilities would be located within the Lake City USGS quadrangle in sections 12, 13, and 24 Township 44 north Range 15 east; on APN 026-080-018; APN: 026-100-004; APN 026-100-014; APN 026-100-006; and APN 026-100-008. The well pads would be sited in areas designated as Prime Farmland, Farmland of Statewide Importance, Farmland of local importance or Grazing land by the California Department of Conservation (DOC).

The Project parcels are zoned as Unclassified; the general land use designation is Exclusive Agriculture or Exclusive Agriculture/ General Agriculture. The following parcels are under the Williamson Act contract: APN 026-100-004-000, APN 026-080-009-000, APN 026-100-014, APN 026-100-008, and APN 032-030-001.

Comments

Mitigation Monitoring and Reporting Program.

The ISMND addresses mitigation measures to environmental resources within their respective environmental analysis resource sections but does not cite the Mitigation Monitoring and Reporting Program (MMRP) throughout the ISMND. There is no mention of the MMRP within the document's text and the document does not list the MMRP as an appendix or attachment within the Table of Contents. Additionally, the document fails to identify whether the mitigations are feasible and imposed as a condition for the approval of the project. (PRC, § 21081.6; CCR, Title 14, §§ 15097, 15370.) All mitigation measures in the MMRP must be fully enforceable. (PRC § 21081.6; CCR, Title 14, §§ 15074, subds. (c)-(d), 15097, subd. (a)(2).) The consistent reference to the MMRP and its enforceability needs to be included in the document so that CalGEM can rely on the final ISMND when the applicant submits an NOI to drill any of the wells in the proposed project.

Rework of Wells

The ISMND does not discuss nor analyze the impacts associated with the reworking of the wells. A situation may occur wherein the operator may decide to reenter and rework an already completed well for purposes of repairing it or enhancing its potential. The discussion and analysis need to be in the documents so that CalGEM can rely on the final ISMND when the applicant applies for an NOI to rework any of the wells in the project.

Page 2-19, Section 2.1 Project Location and Setting; Page 2-29, Section 2.5 Well Testing

The project as proposed does not include injection wells, but rather states "If a well merits further testing, a temporary (up to 3 months) pipeline may be constructed between well pads, with one serving as the test well and the other being a temporary

injection well to return the test fluid/brine back to the geothermal reservoir." If any of the test wells are to be used as injection wells, the analyses and any impacts that may be associated with them need to be discussed in the final ISMND.

Pages 2-20, 2-24, 2-25, Section 2 Project Description; Page 2-24, Table 2.4-1

The project as proposed does not clearly quantify temporary and permanent disturbance. On page 2-20 Section 2.3.1 Geothermal Test Wells, the document states that "test wells and associated facilities would be temporary, and the pads and access roads would be fully reclaimed at the conclusion of the testing phase." A breakdown of the development in acres (ac) is provided in Table 2.4-1. However, on page 2-25 Section 2.4.3 the document states that there will be an estimated 2.1 acres of permanent surface disturbance. This is contrary to section 2.3.1 which states temporary use. This discrepancy should be addressed in the final ISMND.

Page 3-71, Table 3.8-1

In response to "b) Result in substantial soil erosion or the loss of topsoil? None Required." CalGEM disagrees with the "None Required" assertion. The impact should be changed to "Potentially Significant Unless Mitigated" with a mitigation measure that requires silt fencing be constructed to prevent the loss of topsoil due to erosion.

In response to "c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? None Required." CalGEM disagrees with the "None Required" assertion. The impact should be changed to "Potentially Significant Unless Mitigated" with a mitigation measure that geo-technical investigation and soil testing be done before drilling starts, and, based on the results of the study and testing, a subsidence monitoring plan may be needed due to the instability of the soil, and potential landslides and lateral spreading.

In response to "d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risks to life or property? None Required." CalGEM disagrees with the "None Required" assertion. The impact should be changed to "Potentially Significant Unless Mitigated" with a mitigation measure that geo-technical studies be conducted to ensure stable well pads due to the potential for soil expansion.

Conclusion

CalGEM appreciates the opportunity to comment on the draft ISMND to assist Modoc County in identifying and mitigating project impacts on geothermal resources. The comments made in this letter need to be addressed in the final ISMND for CalGEM to make the determination that the ISMND complies with CEQA and can rely on the final ISMND when the applicant submits a NOI to drill any of the wells in the project.

Questions regarding this letter or further coordination should be directed to Jan Perez, CalGEM CEQA Program at Jan.Perez@conservation.ca.gov and Jerry Salera, Geothermal Unit at Jerry.Salera@conservation.ca.gov.

Sincerely,

Krysty Emery

Krysty Emery
CEQA Branch Manager, CalGEM
Krysty.Emery@conservation.ca.gov