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Cecil D. Sterling
Permitting Manager

101 Ash Street
San Diego, CA 92101-3017

Tel: 619.696.2940
Fax: 619.696.2911

csterling@sempra-res.com

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April 17, 2000

Ms Deborah Scott
Director, Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Re: Amendment to our Application for a Certificate of Environmental Compatibility
for the Mesquite Generating Station; Docket # L-000005-00-0101

Dear Ms. Scott:

Due to a printing error, pages 11 and 12 of our application contain the same information. As a remedy, we are transmitting an original and 25 copies of the corrected pages to replace those now included. Please request that the recipients of copies of the application remove pages 11 and 12 and replace them with the new pages provided.

We apologize for the inconvenience, and appreciate your help with correcting the error.

Sincerely,

Cecil D. Sterling
Permitting Manager

cc: M Swartz
J. Rowley
File 3150.904

Quality of the Water

In terms of total dissolved solids (TDS), the local groundwater (up to 3000 mg/l) is of significantly poorer quality than either the CAP water (500 to 550 mg/l) or the Effluent (800 to 1000 mg/l). Despite its elevated TDS, the local groundwater is still usable for power plant cooling.

Use of local groundwater for the proposed facility allows the lower TDS CAP water and Effluent to be saved for other purposes. Management of water resources in this manner keeps the CAP water and Effluent available for purposes which cannot otherwise use groundwater or which would require greater quantities of groundwater because of its poorer quality. For example, Effluent is used by the Buckeye Irrigation District and is also used to assist in maintenance of habitat in the Gila River channel, as noted below.

Water Availability and Impact of Water Use

The estimated life of the facility is 30 years, requiring a long term and reliable supply of water. This is a concern for all three water sources, but unlike CAP water and Effluent, the long term availability of groundwater can be determined by analysis and modeling of the aquifer considering the expected withdrawals. The long term availability of CAP water and Effluent are restricted by contractual, legal, environmental, and other factors outside the control of Mesquite Power.

Contracts for CAP water are available, but these contracts do not guarantee water deliveries. The standard contract language for delivery of CAP water reads as follows:

“... The determination of whether Excess Water is available for delivery in any Year, and if so, the amount of such Excess Water that is available for delivery under this Agreement in any Year, is a determination within the exclusive discretion of the CAWCD; provided, however, that delivery of Excess Water under this agreement shall be subject to the prior satisfaction of all water deliveries scheduled pursuant to a contract with the United States or a subcontract with the United States and CAWCD providing for Project Water service for a period of 50 year or more.”

The lack of guaranteed delivery of CAP water leads to the need for a back-up water supply. This back-up supply would become the primary water supply as excess CAP water allocations decrease in the future because of increasing industrial and non-industrial demands for CAP water.

Effluent from the 91st Avenue Treatment Plant is currently delivered to the Palo Verde Nuclear Generating Station (PVNGS) under contractual terms, and a fixed allocation of Effluent is also delivered to Buckeye Irrigation District. Effluent in excess of that used by PVNGS and that allocated to Buckeye Irrigation District is discharged to the Gila River channel. However, based on discussions with the City of Phoenix and Buckeye Irrigation District, it is Mesquite Power's understanding that excess Effluent from the 91st Avenue Treatment Plant is often not available in the summer when the proposed facility's water

needs are the most critical. Furthermore, we understand that Buckeye Irrigation District has first rights to water that is discharged from the 91st Avenue Treatment Plant into the Gila River channel. Because Effluent received by Buckeye Irrigation District is conveyed via the Gila River channel, such water serves to assist in maintenance of the riparian habitat in the channel. We understand from our discussions that this habitat has already suffered damage at times due to the lack of Effluent discharged from the 91st Avenue Treatment Plant into the Gila River channel during high summer usage by PVNGS.

In addition, the long term availability of Effluent is uncertain because of concerns with long term maintenance of the approximately forty miles of pipeline between the 91st Avenue Treatment Plant and PVNGS, long term maintenance of the treatment facilities at PVNGS, and the competing interests of other parties for use of the Effluent.

The long term availability of groundwater is contingent upon the expected withdrawal rates, the quantity of water contained in the aquifer (about 40 million acre-feet), and expected recharge rates. Mesquite Power, in cooperation with ADWR and existing as well as prospective water users in the area, has initiated a detailed water study to determine the long term availability of groundwater and the impact of withdrawals on surrounding wells.

The water study is organized into three phases. The first phase involves review of historical data (e.g. well logs and other information sources which provide withdrawal rates and well levels), local geological data, and other hydrological data to determine the potentially affected area. Based on the information collected in the first phase, this area is being modeled in the second phase to simulate the aquifer's response to projected water withdrawals. In the third phase, well pumping tests are being conducted, wells are being monitored, and the results are being input to the model to further refine the model and the results it provides.

The first phase of the water study has been completed and the second and third phases are in progress. A report on the first phase and initial results of the second phase are contained in Exhibit B-5.

Location of the Water Source

The project would use about five of the fourteen wells currently in place on the 2,990 acres optioned by Sempra. This acreage is located approximately 2 ½ miles west of the proposed facility. In contrast, CAP water would have to be piped from approximately 20 miles away, and Effluent would have to be conveyed approximately 40 miles via the existing PVNGS pipeline from the 91st Avenue Treatment Plant. As noted previously, long term maintenance of the PVNGS pipeline over the 30 year life of the proposed project represents a significant uncertainty.

1.4.6 Stack Heights and Number

Exhaust gases from each CTG/HRSG will discharge through a stack with an inside diameter of approximately 19 feet and a height of 170 feet.