

December 1, 2015

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Project No. 14110-002 - Washington
Black Canyon Hydroelectric Project
Black Canyon Hydro, LLC

Re: BCH Draft License Application Submittal

Dear Secretary Bose,

Black Canyon Hydro, LLC submits the following Draft License Application (DLA) materials for stakeholder review. Stakeholder review of these materials is intended to aid the applicant in developing a Final License Application (FLA) which is expected to be submitted on or before September 30, 2016. Submittals include:

Exhibits A, B, C, E, F and G.
BCH Preservation, Mitigation and Enhancement Plan List.
Updated Black Canyon Hydroelectric Project Geochemistry Investigation Report.

Materials *not* submitted at this time include the DRAFT Preliminary Design Report, Exhibit D Statement of Project Costs and financing, PME plans and the consult record. These materials will be submitted with the Final License Application.

BCH must make changes to the Project due to subsequent findings of the Groundwater Study and after consult with Puget Sound Energy with regard to the transmission route and location of interconnection. The primary Project changes will include a revised design and construction methods for the underground Powerhouse, vertical shaft and a revised transmission route. As a result meaningful design and cost revisions are now underway, but not ready for review.

Preservation, Mitigation and Enhancement Plan development is underway but months from completion. The submitted list includes the PME plans intended at this time to be developed and submitted with the Final License Application.



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As a follow up to the Groundwater Study, BCH was able to collect additional rounds of general chemistry and isotope samples of groundwater, spring and river samples and complete the analysis of results. The updated Geochemistry Report is included herein.

BCH was also able to perform a geophysical survey of depth to bedrock and complete drilling and construction of a new piezometer, P-4, adjacent to and within 20 ft. of P-3 as previously requested by FERC staff. P-4 is now established and both P-3 and P-4 are equipped with recording pressure (depth) sensors and barometric compensation. As requested by FERC Staff BCH will collect another round of isotope samples from P-3, P-4 and the adjacent river within the next 30-45 days and produce an updated analysis. BCH will continue to monitor groundwater levels in all four existing wells that are part of the study.

BCH has not yet been able to accomplish the discharge measurement at the upper two stream gages bracketing the Intake Site at an approximate 500cfs discharge to determine whether there is any indication of a losing reach at a higher discharge flow. While there have been a few events where discharge has crossed the 500cfs threshold in the past 7-8 weeks, the events have been rather sudden with a steep rise and/or fall in the hydrograph. The rate of change has been much faster than the time it takes to obtain multiple acoustic Doppler current profiler readings at each site for comparison. There are other challenges with this method too. BCH will submit an alternative method for FERC staff review by December 18 that could achieve the objectives of the study.

BCH would appreciate stakeholder and FERC staff review of the materials as submitted, mindful that they are draft and qualified as described above. Thanks to all for your review and consideration.

Sincerely,

Chris Spens
Licensing Manager
Black Canyon Hydro, LLC

