

DOCKETED	
Docket Number:	99-AFC-01C
Project Title:	Elk Hills Power Project - Compliance
TN #:	266447
Document Title:	Application for Confidential Designation CR Report
Description:	Letter from CRC to CEC requesting confidentiality status of CR report titled Appendix H Cultural Resources Survey
Filer:	Daniel I. Padilla
Organization:	California Resources Corporation
Submitter Role:	Applicant
Submission Date:	10/10/2025 12:13:58 PM
Docketed Date:	10/10/2025



9600 Ming Avenue
Bakersfield, CA 93311

October 8, 2025

Mr. Drew Bohan, Executive Director
California Energy Commission
Siting, Transmission, and Environmental Protection Division (STEP)
Safety and Reliability Branch
Compliance Monitoring and Enforcement Unit
715 P Street, MS-2000
Sacramento, California 95814
Attn: Ashley Gutierrez, Project Compliance Manager

**Re: Application for Confidential Designation, CalCapture, CCS Project, Docket Number 99-AFC-01
PTA of Elk Hills Power Plant, Kern County, CA**

Dear Ashley Gutierrez:

Pursuant to Sections 2505 et seq., of Title 20 of the California Code of Regulations, Carbon Terra Vault LLC, a carbon management subsidiary of California Resources Corporation (the "Applicant"), hereby submits this Application for Confidential Designation for Cultural Resource figures and DPR 523 Site records to be submitted in support of the Petition for Modification: Elk Hills Power Plant, which contains locational information of cultural resource artifacts.

Please contact Mr. Daniel I. Padilla at 970.412.2776 (Daniel.Padilla@crc.com) or Ms. Nina Casterline at 661.557.7080 (Nina.Casterline@crc.com) if you have any questions or require additional information.

Sincerely,

B. Joe Ashley
Director - Governmental & External Affairs

Attachment: See next page (two pages).

Cc: File

**APPLICATION FOR CONFIDENTIAL DESIGNATION
ELK HILLS POWER PLANT (99-AFC-01)
PTA FOR CALCAPTURE PROJECT**

1. *Specifically indicate those parts of the record which should be kept confidential.*
 - a. *Title, date, and description (including number of pages) of the information or data for which you request confidential designation.*
 - b. *Parts of the information or data for which you request confidential designation.*

Carbon Terra Vault LLC, a carbon management subsidiary of California Resources Corporation (the "Applicant") seeks confidential designation for Figures 4.1b, Figure 4.1c, and DPR523 forms of the Stantec Cultural Resources Study, dated October 2025, submitted in support of the Petition for Modification: CalCapture CCS Project. The Information should be kept confidential as it contains sensitive information regarding the location of cultural resources.

2. *State the length of time the record should be kept confidential and provide justification for the length of time.*

The Information should be held confidential indefinitely to protect the cultural resources identified therein.

3. *Cite and discuss:*
 - (a) *the provisions of the Public Records Act or other law that allow the Commission to keep the information or data confidential and explain why the provision applies to the material.*

The Public Records Act exempts from disclosure archaeological site information and reports maintained by or in the possession of agencies. (See, Govt. Code § 7927.005.) These provisions apply to the Information because it provides locational information regarding archaeological site information, including information maintained as confidential by the California Office of Historic Preservation and California Department of Parks and Recreation.

(b) the public interest in nondisclosure of the material submitted for confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

California Government Code Section 7922.000 provides that an agency may withhold information from disclosure where the public interest served by nondisclosure clearly outweighs the public interest of disclosure. The public interest in nondisclosure outweighs that of disclosure, as disclosure may enable the location of sensitive cultural resources sites by entities conducting unauthorized collection or disturbance of such resources.

4. *State whether the information may be disclosed if it is aggregated with other information or masked to conceal certain portions, and if so the degree of aggregation or masking required.*

The Applicant considered whether it would be possible to aggregate or mask the information. A redacted version of the Cultural Resources Report (Appendix I) to the Petition for Modification of the CalCapture CCS Project will be prepared and docketed.

5. *State whether and how the information is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant, and if so under what circumstances.*

The Information is accessible only to the Applicant's employees or consultants working on behalf of the CalCapture CCS Project, and regulatory agencies that have regulatory oversight or other responsibilities over either the Information or the Elk Hills Power Plant.

I certify under penalty of perjury that the information contained in this Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this Application and Certification on behalf of the Applicant.

Date: October 8, 2025

CALIFORNIA RESOURCES CORPORATION

By: 

B. Joe Ashley
Director – Governmental & External Affairs