DOCKETED	
Docket Number:	99-AFC-01C
Project Title:	Elk Hills Power Project - Compliance
TN #:	269920
Document Title:	Elk Hills Power Project (99-AFC-01C) Cal Capture PTA Data Requests, Set 2
Description:	Data Requests Set 2 for Elk Hills Power Project (99-AFC-01C) regarding the petition to amend to add Cal Capture Carbon Capture Facility (TN 266900)
Filer:	Ashley Gutierrez
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	5/11/2026 9:41:52 AM
Docketed Date:	5/11/2026

May 11, 2026

Daniel Padilla
California Resources Corporation
9600 Ming Avenue
Bakersfield, CA 93311

Data Requests Set 2 for Elk Hills Power Project (99-AFC-01C)

Dear Daniel Padilla:

The California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 2, which is necessary for the staff analysis of the Elk Hills Power Project (EHPP) petition to amend (TN 266900). The proposed project changes include the construction of the "Cal Capture" carbon capture unit and ancillary equipment, including but not limited to, new carbon dioxide (CO_2) and water pipelines, a new substation and switching equipment, transmission lines and tubular poles and a perimeter road.

These Data Requests seek further information in the areas of Biological Resources, Hazards and Hazardous Materials, Geologic Hazards, Worker Safety and Fire Protection, and Soil and Water Resources, based on the contents of the petition to amend.

To assist CEC staff (staff) in timely completion of its environmental review and to meet the requirements of the California Environmental Quality Act (see Cal. Code Regs., tit. 14, §§ 15108, 15109), CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please let me know within 10 days of receipt of this letter. If you have any questions, please email me at Ashley.Gutierrez@energy.ca.gov.

Ashley Gutierrez
Compliance Project Manager

Enclosure: Data Requests Set 2

CC:

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ELK HILLS POWER PROJECT (99-AFC-01C)
DATA REQUESTS SET 2

BIOLOGICAL RESOURCES

Authors: Leane Dunn

BACKGROUND: Special-Status Species

The applicant provided Biological Resources information in Section 4.2 of the Corrected Cal Capture Petition to Amend (petition) (TN 266900), Appendix G Biological Resources Technical Report (BRTR) (TN 266440 Part A), and Appendix C to Appendix G Aquatic Resources Delineation Report (ARDR) (TN 266448 Part B).

CEC staff, in coordination with California Department of Fish and Wildlife (CDFW), have concerns regarding potential impacts to Crotch's bumble bee (*Bombus crotchii*), burrowing owl (*Athene cunicularia* ssp. *hypugaea*), western spadefoot (*Spea hammondii*), and Temblor legless lizard (*Anniella alexanderae*). See Data Requests Set 1, (TN 269272) for data requests 18, 19, and 21 for additional information pertaining to Temblor legless lizard, Crotch's bumble bee, and burrowing owl, respectively.

Western spadefoot is federally proposed as threatened and is a CDFW species of special concern. On September 24, 2025, the California Fish and Game Commission received a petition to list the northern population of western spadefoot as threatened under the California Endangered Species Act (CESA). In January of 2026, CDFW determined that the petitioned action to list western spadefoot under CESA may be warranted (CDFW 2026). The BRTR did not discuss western spadefoot beyond what was provided in Table 10, K*nown and Potential Occurrences of Special-Status Wildlife within the BSA*, which ranked the species potential to occur as low. Although the closest CNDDB occurrence for this species is approximately 5 miles away, Table 10 states that suitable upland habitat is present but there is no suitable breeding habitat.

Multiple studies indicate that northern western spadefoot is more likely to occur in areas where there is 60% or more grassland cover within 2,000 meters (1.24 miles) of ephemeral pools. Additional habitat characteristics include sandy soils, vernal pools, slopes between 4-12 degrees in foothills on the edge of the Central Valley at mid-elevations (CBD 2025). Western spadefoots can also breed in pools associated with ephemeral streams (Rose et al. 2022). However, the aquatic resources delineation was limited to a 50-foot buffer for assessing the presence of potentially jurisdictional waters. Within that 50-foot buffer, the aquatic resources delineation identified two ephemeral streams. In addition, areas surrounding the site are within medium suitability for western spadefoot predicted habitat and within the California Wildlife Habitat Relationships (CWHR) yearlong western spadefoot range (BIOS 2026).

Please note that if western spadefoot becomes a candidate for listing under CESA, take of the species is prohibited without incidental take authorization. Staff therefore

requires additional information regarding western spadefoot to assess potential project impacts, in consideration of CDFW's determination that the northern population may be warranted for listing under CESA.

DATA REQUEST

1. Please provide the following information for the western spadefoot (*Spea hammondii*)

    a. A habitat assessment to evaluate whether suitable aquatic breeding sites (e.g., shallow temporarily ponded or non-flowing drainage areas that persist for a period of at least three weeks between October and May) exist within 300 feet of the project area. Include detailed maps and GIS data delineating western spadefoot potential habitats observed and those with potential to occur.

    b. If suitable aquatic habitat is detected, surveys conducted at those aquatic breeding sites during the time of year when the species can be detected above ground, for the presence of western spadefoot and provide associated figures and GIS data.

    c. The western spadefoot habitat assessment and survey results report should identify the date(s) the survey was completed, methods used to complete the surveys, name(s) and qualifications of the biologists conducting the surveys, and identification of appropriate field survey protocols.

BACKGROUND: Project Description

The petition, Section 3.3.4 Road Construction states that within the previously disturbed Cal Capture footprint, a new perimeter road approximately 1,550 feet in length would be constructed around the Carbon Capture Unit (CCU) for general access as well as emergency access. The location of the temporary access road is not depicted on Figure 2a, Site Plan.

In Section 2.2, Project Location, the petition introduces the term "Carbon Capture Unit" and states it would be located on approximately 7.64 acres within the developed portion of the Elk Hills Oilfield. In Section 3.1, Project Overview, it states that the CCU, excluding the pipelines and temporary staging and parking areas, would be located immediately south of the Elk Hills Power Plant (EHPP) in a 7.64-acre existing disturbed area. It is not clear until Table 5, Site Disturbance Area, that the 7.64-acre CCU is the Carbon Dioxide (CO_2) Capture Facility Site, which seems to correlate to the "Cal Capture" and "Capture Facility" areas shown on Figure 2a (Site Plan). Staff

requires clarifications on this information to ensure that the project description and associated biological impacts are understood and analyzed appropriately.

Table 5, Site Disturbance Area, includes a superscript "1" stating that the CO_2 Capture Facility Site, CO_2 Pipeline, Temporary Parking Office and Staging Areas, and Borrow Sites are "located underground or within developed/disturbed area." Staff notes that there is a major distinction between an area that is "located underground" and an area that is "developed/disturbed," especially regarding biological resources. Staff requires clarification regarding these areas to accurately assess potential impacts.

In addition, Table 5, Site Disturbance Area, and Section 3.3.3 Onsite Borrow Sites describes borrow sites, but these are not shown in Figure 2a.

DATA REQUESTS

2. Please update Figure 2a Site Plan or provide a new figure showing the following:

    a. All the components as described in the petition and Table 5 for consistency and clarity, including but not limited to, the new perimeter road, the location of the CCU, the CO_2 Capture Facility Site, the CO_2 pipeline, the borrow sites, and 115-kV transmission lines.

    b. Include acreages of impacts that is consistent with Table 5 and the updated figure under 2a, as well as the acreage of other project components (such as the transmission line power poles and proposed substation).

3. Describe the project components shown on Figure 2a but not described in the petition, such as the new BPSTG and transformer, warehouse, and cooling water sump. Please define "BPSTG" as shown on Figure 3a and Figure 4 but not discussed elsewhere in the petition.

4. Please distinguish between which features are underground versus aboveground in disturbed/developed areas.

BACKGROUND: CO_2 Pipelines

The petition, 2.2.6 CTV I [Carbon Terra Vault I] Background Information, states that, "Implementation of the CUP authorizes the construction and operation of underground CO_2 facilities to support the CTV I Carbon Capture Sequesteration (CCS) facility and related infrastructure. Section 3.3.6, CO_2 Delivery Pipeline Construction, provides the sequence of construction activities for the Project; and a "CO2 Line" is shown on Figure 2a, Site Plan. It is not clear whether this pipeline was evaluated as part of the CTV I

County Environmental Impact Report (EIR), or whether it is a component of the EHPP petition.

Section 3.3.6, CO_2 Delivery Pipeline Construction, describes several horizontal directional drilling (HDD) work areas: entry site would be approximately 50 feet by 200 feet, exit site would be approximately 50 feet by 100 feet, and an approximate 10-foot by 1,650-foot temporary work area on the exit side of the drill would be required to string and weld the pullback pipe. These are not shown on Figure 2a, Site Plan.

In addition, the botanical and aquatic resources delineation survey only included a 50-foot buffer from the project site, which may not encompass the HDD work areas described.

Staff therefore requires additional information to clarify the extent, location, and environmental review status of the CO_2 pipeline and associated HDD work areas to ensure that potential biological resource impacts are accurately evaluated.

DATA REQUESTS

5. Please clarify whether construction of the CO_2 pipeline is a component of the EHPP petition or was analyzed and approved as part of the CTV I County Environmental Impact Report.

6. Please provide a figure showing the location of the work areas described for the CO_2 Delivery Pipeline Construction and provide a description of the surveys conducted in these areas and the associated survey buffers.

BACKGROUND: Jurisdictional Components

The petition, 2.2.6 CTV I Background Information, discusses components authorized under CTV I and the United States Environmental Protection Agency (U.S. EPA). There are four wells for which the EPA issued permits, which would be utilized to inject CO_2 captured from the proposed project into the Monterey Formation 26R storage reservoir. The location of these wells is shown on Figure 6, CTV I CO_2 Storage Reservoir. The two wells (353XC-35R and 373-35R) that are near the EHPP petition and the CO_2 Line, as shown on Figure 2a, Site Plan, appear to be just outside the CO_2 Storage Reservoir.

There are two additional wells (363C-27R and 345-36R) that are located approximately 1.3-miles northwest and approximately 0.85-mile southeast, respectively. It is not clear how these wells are tied into the project and what infrastructure would be needed for injection.

In addition, the petition states that facilities improved as part of the CTV I project, including but not limited to the manifold pad, injection wells, monitoring wells and related transmission lines, pipelines and other related facilities, have already been approved by applicable agencies with jurisdiction over those facilities, including the U.S. EPA, California Department of Conservation, Geologic Energy Management Division (CalGEM), and Kern County, and are not part of the proposed project included in the petition. However, given the various components of the EHPP petition, it is not clear where these components would be located, their applicable jurisdiction, or the point of interconnection under CEC jurisdiction and subject to CEC review.

This clarification is important for identifying the scope of biological impacts and determining applicable permits or permit amendments that may be required for both the EHPP petition and the CTV I project. Incidental take authorization under CESA, equivalent to an Incidental Take Permit (ITP) and authorization equivalent to a Lake and Streambed Alteration Agreement (LSAA), falls under the CEC in lieu permitting authority for the EHPP petition, if requested. It is CEC staff's understanding that CDFW has not yet issued permits for the CTV I project. Staff therefore requires additional information so that potential biological impacts can be accurately evaluated.

DATA REQUESTS

7. Please clarify the location of wells 353XC-35R and 373-35R near the EHPP petition CO_2 line and their location outside the CO_2 Storage Reservoir, as shown in Figure 6.

8. Please provide information on the use and connection for wells 363C-27R and 345-36R, including how these wells are tied into the project, and what infrastructure would be needed to support CO_2 injection.

9. Please provide the following clarifications of the jurisdictional components of the EHPP petition project:

    a. Please provide a detailed summary of all components associated with the EHPP petition, including components evaluated under the CTV I EIR (including approved injection wells, manifold pad, monitoring wells, transmission lines, pipelines, and other related facilities), and the jurisdiction of each component (U.S. EPA, CalGEM, Kern County, etc.).

    b. Please provide figure that corresponds to the summary that clearly shows the location of each component and its appropriate jurisdiction.

c. Please include a table that identifies the permitting requirements of each component, and whether those permits have been obtained, or if applications have been submitted (e.g., U.S. EPA permit, CDFW ITP, United States Fish and Wildlife Service consultation, 404/401 Clean Water Act, Regional Water Quality Control Board Waste Discharge Requirements, CDFW LSAA, etc.).

BACKGROUND: CO_2 Release

There is a concern regarding the potential for pipeline failures and ruptures that could result in CO_2 release and poisoning. Excessive CO_2, which displaces oxygen in the air, can be highly toxic to humans and wildlife. The CTV I EIR, approved by Kern County, did not address potential impacts from CO_2 release and poisoning, how a release could impact plants and wildlife species, and mitigation measures to reduce the impacts to less than significant. Staff requires additional information to understand the potential biological and ecological impacts that may result from CO_2 injection releases.

DATA REQUEST

10. Please provide detailed information on any impacts associated with Carbon Sequestration/Injection leaks as it relates to the following:

    a. Leaks occurring at the point of injection sites;

    b. Leaks resulting from catastrophic events (e.g., earthquakes, etc.);

    c. The expected extent of the impact from a leak, including horizontal and vertical distance the leak travel, whether the CO_2 would settle in certain geographic features, and at what distance would the CO_2 dissipate to levels that would no longer cause harm or mortality, etc.;

    d. CO_2 related impacts on geological features, including aquatic resources and sensitive vegetation communities;

    e. Impacts to plant and wildlife species that may be exposed to CO_2 leaks; and

    f. Mitigation measures to reduce plant and wildlife species impacts, and whether those measures would reduce impacts to less than significant.

REFERENCES

BIOS 2026. Biogeographic Information and Observation System (BIOS). Accessed March 2026. WSF Predicted Habitat – CWHR A028 [ds 1994] and WSF Range – CWHR A028 [ds590] BIOS Layers. California Department of Fish and Wildlife.

CDFW 2026. California Department of Fish and Wildlife. January 2026. Petition Evaluation for Western Spadefoot (*Spea hammondii*). Report to the Fish and Game Commission, California Natural Resources Agency, Sacramento, CA, USA.

CBD 2025. Center for Biological Diversity. September 2025. Petition to list the Northern and Southern Populations of Western Spadefoot (Spea hammondii) as Threatened and Endangered, Respectively, under the California Endangered Species Act. Accessed at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=236784&inline

Rose et al. 2022. J.P. Rose, B.J. Halstead, R.H. Packard, and R.N. Fisher. Projecting the remaining habitat for western spadefoot (*Spea hammondii*) in heavily urbanized southern California. Global Ecology and Conservation, 33, e01944 . Accessed at: https://www.sciencedirect.com/science/article/pii/S2351989421004947

HAZARDS AND HAZARDOUS MATERIALS

Authors: Alvin Greenburg

BACKGROUND: The petition (TN 266900) and supporting documentation reference anticipated hazardous materials in multiple sections; however, a complete and consistent inventory was not identified. Section 3.4.6.1 directs the reader to Table 4 for chemicals used at the CCU, but Table 4 does not appear to be all-inclusive (see Table 34). In addition, Section 4.6 (Table 33) includes incorrect or non-existent section references, and the quantitative risk assessment (QRA) and Section 3.4.6 identifies additional chemicals not clearly reflected in the petition. This creates inconsistencies in the identification of hazardous materials. This information is necessary for CEC staff to evaluate potential hazards and applicable safety requirements.

DATA REQUEST

11. Please provide a complete and consistent list of all hazardous materials associated with the project, including maximum quantities for each material, including those used, stored, or transported. For each material, provide the SDS and summarize key hazard characteristics, including flammability properties

(e.g., flash point, ignition temperature, and explosive limits), as applicable. Additionally, revise the petition, as appropriate, to ensure all hazardous materials and section references are accurate and consistent.

BACKGROUND

Section 4.6.2.2 references mitigation measures HM-1, HM-4, and HM-7 as measures to avoid accidental spills, leaks, and/or improper disposal of hazardous materials. However, these references appear to be incorrect or inconsistent with the mitigation measures presented elsewhere in the document. This inconsistency makes it unclear which mitigation measures are applicable and how hazardous material risks will be addressed.

DATA REQUEST

12. Please clarify the correct mitigation measures applicable to hazardous materials management and revise the document, as appropriate, to ensure all mitigation measure references are accurate and consistent and identify where each measure is described in the document and how it is implemented.

BACKGROUND

Mitigation Measure HM-8 appears to be limited to releases or accidental spills of hazardous materials into water bodies or water sources. It is unclear whether this measure also addresses releases or spills to land, which could also result in environmental and safety impacts.

DATA REQUEST

13. Please clarify whether Mitigation Measure HM-8 applies to releases or accidental spills to land. If not, please revise the mitigation measure, as appropriate, to address potential releases or spills to land.

BACKGROUND

Mitigation Measure HM-9 appears to be limited to qualifying petroleum facilities and liquid hydrocarbons. However, the proposed project includes the use and storage of non-petroleum hazardous materials (e.g., amine solvents, caustics, and acids) that could also pose spill and release risks. It is unclear whether spill prevention and control measures adequately address these materials.

DATA REQUEST

14. Please clarify the applicability of Mitigation Measure HM-9 to the project. If HM-9 is limited to petroleum-based materials, please describe the spill prevention, containment, and control measures that will be implemented for non-petroleum hazardous materials. Additionally, revise the mitigation measures, as appropriate, to ensure all hazardous materials are adequately addressed.

BACKGROUND

Petition Table 35 (LORS for Hazards and Hazardous Materials) includes references to the Kern County Hazardous Materials Response Plan and other applicable Kern County policies with section citations (e.g., Sections 4.6.2.2 and 4.15.3); however, an explanation of how the project conforms to these requirements was not identified in the cited sections or elsewhere in the document. In addition, several section references appear to be incorrect or incomplete. This creates uncertainty regarding how the project meets applicable county requirements.

DATA REQUEST

15. Please identify and describe how the project conforms to each applicable requirement listed in Table 35, including the Kern County Hazardous Materials Response Plan and applicable policies. Additionally, revise the petition, as appropriate, to ensure all section references are accurate and include a clear discussion of conformance.

BACKGROUND

The petition identifies various hazardous materials associated with the project; however, quantities and regulatory threshold comparisons were not clearly provided. As a result, it is unclear whether applicable regulatory programs (e.g., Risk Management Plan requirements or other hazardous materials regulations) are triggered and how compliance is determined.

DATA REQUEST

16. Please identify the maximum quantities of each hazardous material proposed for use or storage and describe how these quantities compare to applicable

regulatory thresholds. For each applicable program, identify whether the project is subject to the requirements and describe how compliance will be achieved.

BACKGROUND

The petition references the use of engineering controls to reduce the potential for hazardous material releases; however, a detailed description of storage and containment systems for hazardous materials was not identified. As a result, it is unclear how releases will be prevented, contained, and managed.

DATA REQUEST

17. Please describe the storage and containment systems for hazardous materials associated with the project, including tank design, secondary containment, spill control features, and leak detection systems. Additionally, describe how these systems are designed to prevent and control releases.

GEOLOGICAL HAZARDS

Author: Kevin M. DeLano, P.G., M.S.

BACKGROUND: Preliminary Site-Specific Geotechnical and Geohazard Reports

The 2025 California Building Code, Section 1803, requires new construction to complete geotechnical and geohazard investigations and reports that evaluates, and recommends mitigation for, geologic hazards. CEC staff are reviewing the geotechnical and geohazard investigations referenced in the petition that were conducted for the project.

The Recirculated Draft EIR, Volume 2, Appendix E.1 (June 2024) includes a preliminary site-specific geotechnical and geohazard investigation. CEC staff reviewed this report.

- Soils Engineering, Inc. (SEI) (2023). Preliminary Soil and Geologic Evaluation Terra Vault 1 Carbon Capture Project, Elk Hills, Kern County, California. Prepared for Quad Knopf, Inc. SEI File No. 22-18566. October 2023.

The petition, Appendix K, Geohazards Assessment (TN 266444) incorporates the following geotechnical and geologic information that was prepared by the California Resources Corporation for the Carbon Terra Vault I project.

- SEI. (2025). Geotechnical Investigation Report for the Terra Vault 1 Carbon Capture Project 4026 Skyline Road Tupman, Kern County, CA.

- SEI. (2023). Geotechnical Investigation Report for the Elk Hills GEHA & Truck Unloading Station 4026 Skyline Road Tupman, Kern County, CA.

- SEI. (2020). Geologic Hazards Study for the CO2 Capture Project from EHPP.

The reports cited in Appendix K (TN 266444) of the petition have not been submitted to project docket and are not available for CEC staff to review.

DATA REQUEST

18. Please provide the following references that were cited in Appendix K (TN 266444) of the petition for CEC staff to review.
    a. SEI. (2025). Geotechnical Investigation Report for the Terra Vault 1 Carbon Capture Project 4026 Skyline Road Tupman, Kern County, CA.
    b. SEI. (2023). Geotechnical Investigation Report for the Elk Hills GEHA & Truck Unloading Station 4026 Skyline Road Tupman, Kern County, CA.
    c. SEI. (2020). Geologic Hazards Study for the CO2 Capture Project from EHPP.

WORKER SAFETY AND FIRE PROTECTION

Authors: Alvin Greenberg, Dan Dowdy and Michele Shi

BACKGROUND

The petition Section 4.17.2.2 includes brief descriptions of training and safety programs during construction and operation and references the CRC Safety Manual (October 2024). Staff requires additional information on the proposed revisions to the Safety and Health Programs required.

DATA REQUEST

19. Please describe how the proposed project will be incorporated into the existing Construction and Operation Safety and Health Programs, including updates to the Emergency Action Plan and Fire Prevention Plan, and identify any project-specific programs required for the CCU and CO_2 pipeline.

BACKGROUND

Kern County is a highly endemic region for valley fever. While **MM AIR-3** references a Worker Environmental Awareness Program, Table 73 does not address valley fever or

applicable worker protection requirements. Staff requires that valley fever be addressed to ensure workers are protected from potential valley fever exposure.

DATA REQUEST

20. Please provide a description of the project's valley fever prevention and response plan, including the exposure monitoring program and specific respiratory protection requirements (e.g. triggers, availability, minimum NIOSH filters). Additionally, revise the tables within Section 4.17 Worker Health and Safety to address valley fever and indicate the applicable laws, ordinances, regulations and standards (LORS).

BACKGROUND

The petition (TN 266900) includes conflicting information regarding the applicability of the Process Safety Management (PSM) standard. Section references indicate that PSM may be required, while other portions of the document state that PSM does not apply because threshold quantities are not exceeded. Table 35 states that storage threshold quantities are provided in Appendix A; however, this information was not clearly identified. In addition, the basis for determining whether applicable thresholds for highly hazardous chemicals or flammable gases are exceeded is not clearly described. As a result, staff is unable to verify whether PSM requirements apply to the project.

DATA REQUEST

21. Please provide a detailed evaluation of the applicability of the California Occupational Safety and Health (Cal OSHA) Process Safety Management standard (8 CCR §5189) to the project. Identify all chemicals evaluated, the quantities associated with each process, and the applicable threshold criteria. For each determination, describe the basis for concluding whether PSM requirements apply and revise the petition, as appropriate, to provide a clear and consistent discussion of PSM applicability.

BACKGROUND

Mitigation Measure **HM-7** identifies a Health and Safety Officer (HSO) as responsible for reviewing results; however, it is unclear whether this role has the appropriate qualifications to evaluate potential worker exposure risks. Evaluation of chemical exposure and health impacts is typically performed by a qualified Industrial Hygienist (IH). As a result, staff is unable to determine whether the proposed review process meets accepted professional standards.

DATA REQUEST

22. Please clarify the qualifications of the individual responsible for reviewing results under Mitigation Measure **HM-7**. Identify whether a qualified Industrial Hygienist will perform or oversee this review and describe how worker exposure evaluations will be conducted in accordance with applicable standards.

BACKGROUND

The Soil Management Plan (TN 266899, Section 3.1.1, p. 10) states that required health and safety training includes Hazardous Waste Operations and Emergency Response (HAZWOPER) training, or site-specific training. However, if site activities involve hazardous waste, HAZWOPER training is required under applicable Cal OSHA regulations (Title 8 §5192) and would not be optional. This creates uncertainty regarding whether the project will comply with required training standards and whether personnel will receive the appropriate level of training.

DATA REQUEST

23. Please clarify whether site activities will involve hazardous waste requiring HAZWOPER training. If so, confirm that all applicable personnel will receive the required HAZWOPER training in accordance with regulatory requirements found in Title 8 §5192. If not, describe the basis for determining that HAZWOPER is not required and identify the specific training that will be provided to ensure worker safety.

BACKGROUND

The project site is subject to ongoing remediation under separate regulatory authority. The Phase I Environmental Site Assessment (ESA) and Soil Management Plan (SMP) identify contaminants of concern within site soils. Mitigation Measure HM-6 requires Phase II ESA activities to support a Soil Management Plan; however, the petition and SMP do not clearly define how contaminated soils will be consistently evaluated and managed during project construction and operation.

In addition, the Soil Management Plan (TN 266899, Table 1) identifies planned remedial activities for project areas of concern to depths of approximately 5 feet, while project construction activities may require excavation below this depth. The SMP does not clearly describe how soils encountered below the planned remediation depth will be evaluated or managed, or whether deeper contamination has been characterized or is anticipated. As a result, staff is unable to evaluate potential worker exposure and soil management requirements for project activities.

DATA REQUEST

24. Please describe how contaminated soils encountered during project construction and operation, including soils below the planned remediation depth, will be evaluated and managed. Include:

    a. The analytes or parameters used to characterize soils and the basis for their selection;

    b. The criteria or thresholds used to determine soil handling, segregation, or disposal; and

    c. How these procedures will be coordinated with existing site remediation programs and known contaminants of concern.

BACKGROUND

Section 3.4.4 of the petition (TN 266900) states that an Emergency and Remedial Response Plan will be prepared in accordance with 40 CFR 146.94(a); however, this plan applies to Class VI injection wells and does not clearly address emergency response for the broader facility. A comprehensive facility-wide Emergency Response Plan (ERP) and Emergency Action Plan (EAP) were not clearly identified. As a result, staff is unable to evaluate how emergencies affecting different project components will be managed.

DATA REQUEST

25. Please describe the facility-wide ERP as part of the California Accidental Release Program (Cal ARP) 19 CCR §5050.1, and Emergency Action Plan (EAP, Cal OSHA 8 §3220) for the EHPP and carbon capture project. Include emergency procedures specific to each major project component, including the power plant, carbon capture facility, and CO_2 pipeline. At a minimum, address evacuation procedures, impacts of plant evacuation on operations, availability and use of supplied air, protections for control room operators and the control room, and plans for remote operation, including how such operations would be implemented and managed. Additionally, describe how these plans are coordinated with local emergency responders and integrated into overall facility operations.

ELK HILLS POWER PROJECT (99-AFC-01C)
DATA REQUESTS SET 2

BACKGROUND

Section 4.6.2.2 states that the nearest receptors would be personnel working at the CTV I facilities; however, the petition does not clearly describe how workers or first responders would be alerted to the presence of CO_2 during a release. Given that CO_2 is colorless and odorless, timely detection and notification are critical. As a result, staff is unable to evaluate whether adequate warning and communication measures are in place.

DATA REQUEST

26. Please describe the systems and procedures used to detect and communicate the presence of CO_2 to workers and first responders. Include the types and locations of detection systems, alarm and notification methods (audible, visual, or other), communication protocols, and expected response times. Additionally, describe how these systems are integrated with emergency response procedures and worker training.

BACKGROUND

Mitigation Measure **HM-5** requires notification to applicable agencies for spills or releases of hazardous materials, excluding CO_2. However, a release of CO_2 may pose significant hazards to workers and the public and may require notification to regulatory agencies depending on the nature and extent of the release. Excluding CO_2 from notification requirements creates uncertainty regarding how such releases would be reported and managed. As a result, staff is unable to evaluate whether appropriate notification and response procedures are in place.

DATA REQUEST

27. Please clarify the notification requirements applicable to CO_2 releases for the project. Identify the conditions under which CO_2 releases would be reported to regulatory agencies and emergency responders and describe the procedures that will be followed to ensure timely notification. Additionally, revise the petition, as appropriate, to ensure that notification requirements for CO_2 releases are clearly defined and consistent with applicable regulations and emergency response protocols.

BACKGROUND

MM HM-2 discusses transportation-related risks but focuses primarily on rollover scenarios and does not clearly address other potential transportation hazards, such as collisions, releases during transfer, or loss of containment under varying conditions.

In addition, the discussion references the Hazardous Materials Transportation Act but does not clearly identify applicable U.S. Department of Transportation (DOT) requirements nor those of California Vehicle Code §31303, nor does it demonstrate conformance. Table 35 identifies Kern County policies related to the transportation of hazardous materials, including designated routes; however, these policies are not clearly addressed. As a result, staff is unable to evaluate whether transportation risks and applicable requirements have been adequately considered.

DATA REQUEST

28. Please provide the following:

    a. A Hazardous Materials (Hazmat) Highway Transportation Management Plan (HMTMP) that follows the guidelines and requirements of the Federal Motor Carrier Safety Administration (FMCSA) regulations (49 CFR Parts 100-185), focusing on safe packaging, proper placarding, shipping papers, emergency response information, and mandatory driver training. It shall also follow the guidelines and requirements of the State of California (California Vehicle Code §31303), where hazardous materials transporters must follow strict highway management plans, emphasizing routing through designated state or interstate highways, include emergency response procedures, spill control equipment, driver training, and, for specific quantities, a Hazardous Materials Business Plan (HMBP) filed with local authorities (CUPA). This HMTMP shall be independent of any general transportation management plan for the project.

    b. A comprehensive description of hazardous materials transportation risks associated with the project, including scenarios beyond vehicle rollover (e.g., collisions, transfer incidents, and other release scenarios). Additionally, describe how the project will comply with Kern County policies regarding hazardous materials transportation, including designated routes, and revise the petition, as appropriate, to ensure these requirements are clearly addressed.

BACKGROUND

The petition provides limited information regarding the design and configuration of injection wellheads, well pads, and pipeline rights-of-way. Additional detail is necessary for staff to evaluate access, controls, and safety features and to assess associated hazards and mitigation measures.

DATA REQUEST

29. Please provide a description of the well pads and associated infrastructure. At a minimum, include the following:

    a. Description of any fixed structures (e.g., buildings, restrooms, or storage).

    b. Methods used to detect and communicate elevated CO_2 levels, including alarm and notification systems for workers and first responders.

    c. Wellhead configuration, including surface exposure, worker access provisions, and the use of vaults or confined spaces.

    d. Local emergency shutdown systems, including manual and automated mechanisms, associated energy sources, and backup power.

    e. Access and security features, including worker and first responder access, roadways, fencing, lighting, and surveillance or monitoring systems.

    f. Vegetation or fuel management measures, if applicable.

    Additionally, revise the Petition, as appropriate, to ensure these features are clearly described.

BACKGROUND

Class VI injection wells are permitted by the U.S. EPA; however, the petition does not clearly identify the status or contents of the Class VI permit application. Additional information is necessary for staff to evaluate alignment with applicable federal requirements and consistency with California regulatory and environmental considerations.

DATA REQUEST

30. Please provide an unredacted copy of the Class VI permit application and all supporting materials submitted to the EPA for CEC review purposes. Additionally, identify the current status of the application and any pending revisions or agency comments.

BACKGROUND

The QRA (TN 268234, Section 3) focuses on risks to the public from accidental releases of CO_2 and other hazardous materials. Section 6.1.1 further states that onsite personnel are excluded from the assessment based on reliance on occupational safety requirements, training, personal protective equipment, and a "voluntary risk" environment. The QRA and petition do not clearly evaluate risks to workers or address fire protection at the engineering and operational level required for CEC review. As a result, staff is unable to evaluate worker safety and fire protection risks associated with the project.

DATA REQUEST

31. Please provide an analysis of worker safety and fire protection risks associated with the project, including potential release scenarios, exposure conditions, and operational hazards, and describe how these risks are addressed through engineering controls, system design, operational procedures, and emergency response measures. Additionally, revise the QRA or petition, as appropriate, to ensure worker risks are evaluated and the basis for excluding workers from the assessment is clarified or removed.

BACKGROUND

Petition Table 35 states that the project would comply with future carbon dioxide pipeline requirements as they are promulgated. However, this statement is general and does not provide sufficient information for staff to evaluate how the project will address pending regulatory requirements under California law, including provisions of SB 614 for which implementing regulations have not yet been finalized (e.g., Section 51011.5(a)(2)). As a result, it is unclear how the project design accounts for forthcoming requirements and ensures future compliance.

DATA REQUEST

32. Please describe the design and operational approach the project will use to accommodate and comply with SB 614 and the State Fire Marshal's carbon dioxide pipeline regulations once finalized. Identify the interim design basis currently being used, describe how the project will address regulatory requirements that are still pending, and explain how the design provides flexibility to incorporate future requirements without significant modification. Additionally, revise the petition, as appropriate, to provide a clear discussion of the project's compliance approach.

BACKGROUND

Provisions for fire protection are discussed in the petition (TN 266900); however, the information provided is limited and does not clearly describe the fire protection approach for the project. For example, Table 70 references Section 4.17.2.1 as providing "a complete description of the fuel handling system and the fire suppression system"; however, that section does not include a detailed or complete description as indicated, and such information was not identified elsewhere. Additional detail is necessary for staff to understand how fire risks will be addressed.

DATA REQUEST

33. Please provide a description of the project's fire protection approach, including applicable codes and standards, fire detection and suppression systems, and how fire hazards associated with project materials, fuel handling, and equipment will be addressed. Include system schematics for all major project components, including the CCU and CO_2 pipeline. Additionally, revise Table 70, as appropriate, to ensure referenced sections accurately reflect the information provided.

BACKGROUND

The petition provides limited discussion of applicable fire protection codes and standards and does not clearly identify or describe conformance with fire-related requirements. The document references the California Fire Code (including outdated references to Articles 79 and 80), Chapter 17.32 of the Kern County Municipal Code, and general National Fire Protection Association (NFPA) standards; however, a complete and current list of applicable fire protection requirements and a clear description of project conformance were not identified. In addition, the California Energy Commission requires conformance with the 2025 California Fire Code.

DATA REQUEST

34. Please provide a complete list of applicable fire protection codes, standards, and local requirements for the project, including the relevant sections of the 2025 California Fire Code. For each, describe how the project conforms to the applicable requirements and revise the petition's Table 73, as appropriate, to ensure all fire protection references are current, accurate, and consistent

BACKGROUND

Table 73 (Worker Safety LORS) identifies applicable NFPA standards and references Section 4.17.2 as providing the basis for demonstrating conformance. However, Section

4.17.2 does not clearly identify the specific NFPA standards applicable to the project or describe how the project conforms to those standards. In addition, the accuracy of the NFPA standards listed is unclear. For example, Table 73 includes NFPA 50A, which has been withdrawn (2004) and incorporated into NFPA 55, and NFPA 55 is not listed. This raises concern that the identified NFPA standards may be outdated or incomplete, and as a result, staff is unable to determine how fire protection and safety systems are designed to meet applicable NFPA requirements.

DATA REQUEST

35. Please identify all applicable NFPA standards for the project and specify how each standard applies to the design and operation of project systems. For each applicable standard, describe how the project conforms to each requirement or identify any deviations. Additionally, revise the petition, as appropriate, to ensure that Table 73 and the referenced sections include a clear, accurate, and consistent description of NFPA conformance. Additionally, identify whether sprinkler systems or fire pumps are required and describe their design and applicability.

BACKGROUND

The petition Section 3.4.4 references a new firewater pipeline that would receive water from the existing EHPP emergency water supply; however, design details for the firewater system were not identified. As a result, taff is unable to evaluate whether the proposed system complies with applicable fire protection requirements, including Chapter 17.32 of the Kern County Municipal Code and the 2025 California Fire Code, or whether the available water supply is sufficient to meet minimum fire flow, pressure, and duration requirements.

DATA REQUEST

36. Please provide a description of the proposed firewater system, including source, storage capacity, pipeline sizing, system layout, and design criteria. Demonstrate how the system meets applicable requirements (minimum fire flow, pressure, and duration) by conducting a fire flow test based on the worst-case fire scenario. Additionally, describe how the project conforms to Chapter 17.32 of the Kern County Municipal Code, the 2025 California Fire Code, and other applicable standards, and provide documentation of coordination with the Kern County Fire Department, including name, title, and contact information.

BACKGROUND

The petition does not clearly identify hazardous (classified) locations or describe ignition source control measures for areas where flammable materials may be present. The presence of flammable materials and identified fire and explosion hazards suggests that hazardous area classification may be required. As a result, staff is unable to evaluate how fire and explosion risks are addressed through facility design and operational controls.

DATA REQUEST

37. Please identify all hazardous (classified) locations for the project and describe the basis for the classification of each area. For each area, describe the applicable classification, associated fire and explosion hazards, and the measures implemented to control ignition sources, including equipment selection, electrical classification, and operational controls. Additionally, describe how the project conforms to applicable codes and standards governing hazardous locations.

BACKGROUND

The petition references the development and implementation of a Fire Safety Plan in multiple sections; however, details regarding the structure, content, and implementation of this plan were not identified. In particular, it is unclear how the plan will address site-specific fire hazards, fire protection systems, emergency response procedures, and coordination with local fire authorities. Without this information, staff is unable to evaluate the adequacy of the proposed fire safety approach.

DATA REQUEST

38. Please provide an outline of the proposed Fire Safety Plan, including its structure, key components, and how it will be implemented. At a minimum, include narrative on how the plan will address site-specific fire hazards, integration with fire protection systems, emergency response procedures, fire department coordination, and personnel training. Additionally, identify any applicable codes, standards, or guidance used in development of the plan.

BACKGROUND

The petition references multiple access roads (e.g., perimeter access road, temporary access road, and new emergency access road) and includes fire department access policies in Table 35 (Policy 6 and Implementation Measure A); however, details regarding the location, design, and configuration of fire department access were not

clearly identified. In addition, information describing how fire department access will be provided for a controlled facility (e.g., gates, Knox box locations, or other access provisions) was not identified. As a result, staff is unable to evaluate compliance with applicable fire department access requirements.

DATA REQUEST

39. Please provide a description of fire department access for the project, including the location and layout of all access roads, design specifications (e.g., width, turning radius, load capacity, and surface type), and how access will be provided to all areas of the facility. Additionally, describe how fire department entry will be facilitated for a controlled site (e.g., gates, Knox boxes, or other access controls) and demonstrate how the project conforms to applicable fire department access requirements.

BACKGROUND

The petition references the use of fuels and flammable or combustible materials; however, a clear and consistent identification of these materials was not identified. In addition, detailed information describing fire and explosion prevention measures associated with the storage, transfer, and handling of these materials was not provided. For example, Table 34 (Characteristics of Planned Hazardous Materials), notes the Fluor's Econamine FG Plus℠ (EFG+) solvent as having a Category 4 flammability. However, the petition does not include a detailed or complete description of the handling system and hazard prevention measures for the EFG+ solvent in the CCU. As a result, staff is unable to evaluate potential fire and explosion hazards or the adequacy of proposed prevention measures.

DATA REQUEST

40. For flammable and combustible materials associated with the project, describe the fire and explosion prevention measures implemented during storage, transfer, and handling, including controls to prevent ignition, detect leaks, and safely manage releases.

BACKGROUND

The QRA (TN 268234) evaluates a range of fire, explosion, and hazardous material release scenarios (e.g., pool fires, jet fires, explosions, and toxic releases) and quantifies associated impact distances and risks. However, these hazards and corresponding impact thresholds are not clearly or consistently identified in the petition, and the relationship between the QRA findings and the proposed project design, fire protection systems, and mitigation measures is not clearly described. As a result, staff is

unable to determine how the project design addresses the hazards identified in the QRA.

DATA REQUESTS

41. Please identify the fire, explosion, and hazardous material release scenarios evaluated in the QRA and describe how the project design addresses these hazards. For each scenario, describe the associated prevention, detection, and mitigation measures incorporated into the project, and explain how QRA assumptions (e.g., detection, isolation, and response) are supported by the proposed design. Additionally, revise the petition, as appropriate, to ensure consistency with the QRA and provide a clear linkage between identified hazards and corresponding design and safety measures.

42. Please provide a description of the applicable LORS and the more stringent local requirements for the design features referenced in the QRA: "leak detection systems, emergency isolation and shutdown devices, pressure relief systems, and equipment layouts that reduce escalation potential."

43. Please provide schematics to demonstrate safety related design features along the CO_2 pipeline, including minimum spacing of equipment, pipeline material and construction, and locations of emergency eyewash and shower stations. Specify the design features that would require future coordination to ensure compliance with upcoming regulations.

BACKGROUND

Section 3.4.4 of the petition references the installation of fire hydrants as part of the project. In addition, Table 73 (Worker Safety LORS) identifies NFPA standards related to fire hose and associated equipment (e.g., NFPA 1961, 1962, and 1963), with Section 4.17.2 cited as the basis for demonstrating conformance. However, a complete description of the fire response equipment, including system layout, design basis, and how the identified NFPA standards apply to the proposed equipment, was not clearly provided. As a result, staff is unable to evaluate the adequacy of the fire response system or its conformance with applicable standards.

DATA REQUESTS

44. Please provide a complete description of the fire response equipment for the project, including hydrants, hose stations, fire hose systems, and other related equipment. For each system, describe its location, spacing, system design basis, intended use, and how it conforms to applicable NFPA standards. Additionally,

revise the petition, as appropriate, to ensure that the listed standards correspond to clearly described project systems.

45. Please provide a complete description of the proposed training provided to local emergency response agencies (e.g. fire department) during construction and operations. Provide a discussion of the content, frequency, and emergency scenarios to be covered in the training.

BACKGROUND

The petition provides limited discussion of the potential consequences of a fire at the carbon capture facility and does not clearly describe how project-specific fire hazards would be prevented, detected, controlled, and mitigated. In addition, the potential for toxic emissions during a fire and the resulting impacts on workers and the public are not clearly addressed. This information is necessary for staff to evaluate the adequacy of the project's fire protection approach.

DATA REQUEST

46. Please provide an analysis of the potential impacts of a fire at the facility, including potential emissions and the effects of those emissions on workers and the public. Additionally, identify the project-specific ignition sources and describe the fire prevention, detection, suppression, and mitigation measures implemented to address these hazards, including the basis for their design.

BACKGROUND

Mitigation Measure **HM-4** identifies requirements related to the CO_2 pipeline, including safety features such as automatic shutdown and monitoring; however, it is unclear whether these features are incorporated into the proposed project design and how they will be implemented. In addition, details regarding the type, location, configuration, and performance of pipeline safety mechanisms were not identified. As a result, staff is unable to evaluate the adequacy of the proposed monitoring and emergency response approach.

DATA REQUEST

47. Please describe the safety mechanisms incorporated into the CO_2 pipeline design, including those used to detect releases, initiate shutdown, and support emergency response. For each mechanism, provide details on its location, design basis, operational function, redundancy, and performance (e.g., detection thresholds, response times, and activation criteria). Additionally, revise

the petition, as appropriate, to ensure these features are clearly described and consistent with Mitigation Measure **HM-4**.

BACKGROUND

Section 3.3.4 of the petition (TN 266900) references gas detection for CO_2 concentrations with audible and visual alarms. In addition, Section 4.6.1 of the QRA Appendix A (TN 268234) references safeguarding systems associated with the Cal Capture facility and CO_2 pipeline, including isolation systems, cameras, and temperature and acoustic sensors. Mitigation Measure **HM-4** also identifies safety-related features for the CO_2 pipeline. However, a detailed and consistent description of these control, monitoring, and isolation systems, including their locations, functionality, and integration, was not clearly identified in the petition. Given the critical role these systems play in detecting releases, managing operational upsets, and supporting emergency response, additional detail is necessary for staff to evaluate the adequacy of the proposed safety approach.

DATA REQUEST

48. Please provide a detailed description of the control, monitoring, and isolation systems associated with the facility and CO_2 pipeline. At a minimum, include the following:

    a. General principle of operation for each system.

    b. Control and monitoring functionalities provided.

    c. Locations of systems relative to key process equipment and pipeline segments.

    d. Redundancy features and availability of uninterruptible backup power (UPS).

    e. Integration with other safety systems, including communication capabilities and interfaces with leak detection systems and emergency shutdown or flow-restricting devices.

    f. Data transmission and monitoring approach (e.g., control room, remote monitoring, or automated systems).

    g. Expected response times during upset or release conditions.

h. Cybersecurity measures implemented to protect system integrity and prevent unauthorized access.

i. Additionally, revise the petition, as appropriate, to ensure these systems are clearly described and consistently presented across all sections, including Mitigation Measure **HM-4** and the QRA.

BACKGROUND

The application states that the subsurface CO_2 pipeline will be installed within existing pipeline rights-of-way and adjacent to other subsurface structures or utilities. A CO_2 release could result in rapid temperature reduction, potentially affecting nearby infrastructure through reduced fracture toughness, thermal stresses, or soil heave or settlement. The QRA (TN 268234) does not address these potential thermal effects. As a result, staff is unable to evaluate potential impacts to adjacent infrastructure.

DATA REQUEST

49. Please provide an evaluation of the thermal effects associated with a CO_2 release, including impacts to adjacent pipelines and structures (e.g., embrittlement, thermal shock, and soil heave or settlement). Identify the design or engineering controls implemented to prevent or mitigate these impacts, such as pipeline spacing, burial depth, insulation, or other protective measures. Additionally, describe how these considerations have been incorporated into the project design.

BACKGROUND

The QRA evaluates release scenarios, including a "hole" case; however, it does not address thermal stresses associated with rapid decompression and auto-refrigeration of CO_2. These conditions can reduce material fracture toughness and increase the potential for crack initiation or propagation. In addition, the petition does not clearly describe pipeline materials or fracture control design (see Mitigation Measure HM-4, p. 199). As a result, staff is unable to evaluate the integrity of the CO_2 pipeline under these conditions.

DATA REQUEST

50. Please describe the CO_2 pipeline material specifications and fracture control design, including how the design accounts for low-temperature conditions associated with rapid decompression. Identify the measures used to prevent crack initiation and propagation, including material toughness requirements, fracture arrest criteria, and applicable design standards. Additionally, revise the

petition, as appropriate, to ensure these design considerations are clearly described.

BACKGROUND

The petition discusses measures for pipeline corrosion; however, these measures appear to be limited to external corrosion. The potential for internal corrosion due to impurities in the CO_2 stream, such as water and sulfur compounds, is not clearly addressed. Given the length and profile of the pipelines, condensation and accumulation of water in low points may occur, increasing the potential for internal corrosion. As a result, staff is unable to evaluate how internal corrosion risks are addressed in the pipeline design and operation.

DATA REQUEST

51. Please describe the measures implemented to prevent and monitor internal corrosion within the CO_2 pipeline. Include the expected composition and quality specifications of the CO_2 stream, controls to limit impurities and moisture, methods to prevent water accumulation, and monitoring or inspection programs (e.g., corrosion monitoring, pigging, or sampling). Additionally, describe how these measures have been incorporated into the pipeline design and operational procedures.

BACKGROUND

The Petition does not clearly describe startup and shutdown procedures for the power plant and carbon capture facility, including how CO_2 conditions will be managed during these operations. Changes in temperature and pressure during startup and shutdown may result in phase transitions or pressure surges that could create operational hazards. As a result, staff is unable to evaluate how the system will maintain safe operating conditions during these transient events.

DATA REQUEST

52. Please describe the startup and shutdown procedures for the power plant and carbon capture facility. Include how CO_2 temperature, pressure, and phase conditions are controlled during these operations, and identify the automated controls, monitoring systems, and safety mechanisms used to prevent pressure surges, temperature fluctuations, or phase transitions. Additionally, describe how these procedures have been incorporated into the project design and operational controls.

BACKGROUND

Mitigation Measure **GEO-4** requires a Professional Engineer to review and approve the pipeline alignment considering expansive soils; however, it does not clearly describe how the pipeline is designed to accommodate soil movement or how potential impacts to pipeline integrity will be mitigated. Soil expansion, contraction, or settlement may induce stresses in the pipeline that could increase the potential for deformation or failure. As a result, staff is unable to evaluate whether the pipeline design adequately addresses these conditions.

DATA REQUEST

53. Please describe how the CO_2 pipeline design accounts for soil movement, including expansion, contraction, and settlement. Identify the design methods, assumptions, and criteria used to evaluate pipeline stresses and deformation under these conditions. Describe any mitigation measures incorporated into the design, such as trenching methods, backfill selection, flexibility provisions, or restraint systems, and any monitoring or inspection programs used to ensure long-term pipeline integrity.

BACKGROUND

The QRA (TN 268234) evaluates the Cal Capture facility and approximately 0.5 miles of the CO_2 pipeline to the 35R manifold but does not appear to evaluate the remainder of the approximate 5-mile pipeline to the injection wells. However, petition Section 4.6.2.2 (p. 193) concludes that impacts to people and structures downslope of the Project would be less than significant. This conclusion is not clearly supported, as the QRA does not evaluate the full pipeline length, associated CO_2 inventory, or terrain effects that may influence plume travel. As a result, staff is unable to evaluate downslope impacts.

DATA REQUEST

54. Please provide an engineering analysis supporting the conclusion that downslope impacts would be less than significant, considering the full pipeline route. Include the effects of total CO_2 inventory, terrain and potential plume channeling, and identify whether additional modeling, design measures, or emergency response provisions are needed. Additionally, revise the petition, as appropriate, to clearly describe the basis for this conclusion.

ELK HILLS POWER PROJECT (99-AFC-01C)
DATA REQUESTS SET 2

SOIL AND WATER RESOURCES

Author: James Ackerman

BACKGROUND

According to Section 3-1 of the corrected Cal-Capture Petition wastewater would be disposed of using an existing Class I injection well. However, in 2011 U.S. EPA Region 9 in consultation with various California State agencies determined that UIC Class I wells 25A-18G (API No. 0403023952), 25A-18G (API No. 0403023952) and 25A-18G (API No. 0403023952), would be better regulated as UIC Class V wells based on the status of the injection formation and injectate constituents (USEPA-IX 2021). These wells are currently regulated as Class V wells under permit R9UIC-CA5-FY20-3.

DATA REQUESTS

55. Please confirm that wells 25A-18G (API No. 0403023952), 25A-18G (API No. 0403023952) and 25A-18G (API No. 0403023952) would be the injection wells used to dispose of wastewater from the Carbon Capture Unit.

56. Please provide a map showing the wastewater pipeline from the Carbon Capture Unit to the Class V injection wells.