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Document Title:	Data Request Set 3 for the Elk Hills Power Project Cal Capture Carbon Sequestration Project (99-AFC-01C)
Description:	Petition for Post Certification Modification for the Elk Hills Power Project Cal Capture Carbon Sequestration Project (99-AFC-01C) Data Request- Set 3 (PTA TN 266900)
Filer:	Ashley Gutierrez
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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California
ENERGY COMMISSION



CALIFORNIA
**NATURAL
RESOURCES
AGENCY**

July 16, 2026

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

**Petition for Post Certification Modification for the Elk Hills Power Project
Cal Capture Carbon Sequestration Project (99-AFC-01C) Data Request-
Set 3**

Dear Daniel Padilla:

The California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 3, which is necessary for the staff analysis of the [Elk Hills Power Project](#) (EHPP) petition to amend ([TN 266900](#)) to construct the Cal Capture Carbon Sequestration facility at the EHPP. 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 (CO₂) and water pipelines, a new substation and switching equipment, transmission lines and tubular poles, and a perimeter road.

Data Request - Set 3, requests further information in the areas of Hazards and Hazardous Materials, Socioeconomics, Transportation, and the Project Description technical areas, 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
Ashley Gutierrez
Compliance Project Manager

Enclosure: Data Request - Set 3

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DATA REQUEST- SET 3**

HAZARDS AND HAZARDOUS MATERIALS

Authors: Dan Dowdy, Alvin Greenberg

BACKGROUND: CO₂ PIPELINE

The petition provides information for approximately 0.5 miles of the CO₂ pipeline associated with the carbon capture facility. The proposed project also includes approximately 11 additional miles of CO₂ pipeline extending to the Class VI injection wells (the pipeline system). While portions of the pipeline system were previously reviewed under a separate environmental process, the CEC must independently evaluate the entire pipeline system as part of its review of the petition. The petition does not clearly identify the relationship between the CO₂ pipeline system and adjacent or crossing utilities and infrastructure along the pipeline alignments to each injection well. As a result, staff is unable to evaluate potential construction, operation, maintenance, and emergency response hazards associated with the complete pipeline system.

DATA REQUESTS

Please provide plan-view and profile schematic drawings of the entire CO₂ pipeline system and route showing existing and proposed utilities and infrastructure located above, below, or to each side within or equal to 5 feet of the pipeline system. At a minimum, include:

1. All co-located pipelines, electrical conduits, fiber optic lines, communication cables, and other utilities running parallel to the CO₂ pipeline system.
2. All utilities and infrastructure crossing over or under the CO₂ pipeline system.
3. The horizontal and vertical separation distances between the CO₂ pipeline system and each adjacent or crossing utility.
4. The type, ownership (if known), and whether each utility is above ground or below ground.

Utilities or infrastructure located greater than 5 feet above, below, or parallel to the CO₂ pipeline system need not be included.

SOCIOECONOMICS/POPULATION AND HOUSING

Author: Ellen Lefevre

BACKGROUND: CONSTRUCTION WORKERS AND OCCUPATIONAL TRADES

On page 42, Section 3.3.9 of the petition states, "The peak number of construction employees for the Project would be approximately 500 workers, including indirect

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personnel. The majority of the construction employees would travel from the Bakersfield area, approximately 34 miles away.” Staff needs additional information on the average number of construction workers per month, and the occupational trades required for project construction.

DATA REQUESTS

5. Provide the average number of construction workers per month needed for project construction.
6. Provide a table with the occupational trades and the number of construction workers needed for each month during construction.

TRANSPORTATION

Author: Andrea Koch

BACKGROUND: VEHICLE MILES TRAVELLED (VMT)

The CEQA Guidelines are not specific on whether to include or exclude construction traffic in the vehicle miles traveled (VMT) calculations, and the issue has not been specifically cited in any legal opinions. However, the California Air Resources Board released the Final Environmental Assessment on its Proposed Strategy for Achieving California’s 2030 Greenhouse Gas Target (Scoping Plan). In its programmatic analysis of impacts relating to transportation and traffic, it was concluded that construction activities would result in short-term construction traffic (primarily motorized) from worker commute and materials delivery trips. “Project specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority”. This suggests that analyzing construction-related impacts on transportation is of interest to the state. Given that construction of the project would generate a greater number of trips than operation, CEC staff concludes it is appropriate to examine the VMT during construction.

Section 15064.3, subdivision (a) of the CEQA Guidelines states, “For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project. Here, the term ‘automobile’ refers to on-road passenger vehicles, specifically cars and light trucks.” Based upon the above considerations, the VMT analysis should evaluate worker, not truck, trips to/from the site during the construction phase.

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Section 4.4.2.2 in the petition provides helpful information regarding average daily worker trips and total worker VMT during the construction period but needs additional information.

Below is an example of a VMT analysis for this type of project (excerpted and adapted from the Potentia-Viridi Battery Energy Storage System Staff Assessment, 24-OPT-04, TN 268314):

Construction worker vehicle trip generation is summarized in Table 5.14-4. The project workforce is expected to commute from within a 26-mile radius of the project site. Daily worker trips and trip lengths were multiplied for each phase of the project to estimate total worker VMT for each construction phase. The sum of the total worker VMT for each construction phase provides an estimate of total worker VMT for the entire construction period. The total worker VMT over the construction period was then normalized over the 25-year project life, which was estimated as 9,100 days, to calculate a total daily worker VMT which takes into account the life of the project. Dividing this total daily worker VMT by the average number of daily workers gives an average daily VMT per worker of 5.4 over the life of the project, as shown in Table 5.14-4.

According to the Alameda County Transportation Commission model, the existing regional VMT per employee for Alameda County is 15.0. The significance threshold is 85 percent of the existing regional VMT, or 15 percent below the existing regional VMT, hence 12.8 VMT per employee. Therefore, the normalized daily VMT per worker of 5.4 VMT per worker estimated for the project's construction is below the regional threshold of VMT per employee (12.8). As a result, the construction phase of the project would result in a less than significant VMT impact.

For the above reasons, the construction of the proposed project would not conflict or be inconsistent with CEQA Guidelines Sections 15064.3(b)(1), and transportation impacts would be less than significant.

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TABLE 5.14-4 TOTAL WORKER VMT DURING CONSTRUCTION PHASE				
Phase	Worker Trips per Day (2 trips/worker)	Average Miles per Trip	Duration (days)	VMT per Phase
Site Preparation	50	26	40	52,000
Civil Work and Grading	110	26	120	343,200
Foundations and Underground Equipment	100	26	80	208,000
BESS Equipment Installation	160	26	100	416,000
Project Substation Installation	40	26	160	166,400
Gen-Tie Foundations and Structure Erection	28	26	40	29,120
Gen-Tie Line Stringing and Pulling	24	26	10	6,240
Testing and Commissioning	52	26	110	148,720
PG&E Interconnection Facility Upgrades with Tesla Substation	40	26	130	135,200
Decommissioning	40	26	150	156,000
TOTAL				1,660,880

TABLE 5.14-5 DAILY AVERAGE WORKER VMT DURING CONSTRUCTION	
Item	Amount
Worker VMT during Construction (from Table 5.14-5)	1,660,880
Project Life (35 years, expressed in days)	9,100
Daily Worker VMT (total divided by number of days)	183
Average Daily Number of Workers over Life of Construction	34
Average VMT per Worker (daily VMT divided by number of workers)	5.4
Alameda County average VMT/Employee (from ACTC travel model)	15.0
Threshold of Significance (15% below County average)	12.8

DATA REQUESTS:

- Please provide a calculation of average daily VMT per construction worker, in accordance with the method shown above.

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8. Please provide a discussion of the assumptions and methods used for the construction worker VMT calculation, including assumptions for the origin of employee trips and number of months of construction.

PROJECT DESCRIPTION

Author: Ashley Gutierrez

BACKGROUND: CO₂ PIPELINE ROUTE

According to the Carbon TerraVault I, voluntary emission reduction agreement (VERA), Exhibit A - Project Description, the CO₂ pipeline will originate from the CGP-1 Cryogenic Gas Plant (Facility S-9168) and would be routed to the EHPP Cal Capture facility. There is not enough information for staff to discern how and if the two facility's CO₂ stream will be combined, separated, or use the same injection wells or not.

DATA REQUESTS

9. Please describe the CO₂ pipeline route and provide a map illustrating its connection to the adjacent facility.
10. Will the CO₂ from both plants be combined and routed in a single pipeline to the injection point or will the facilities have separate injection pipelines that would run parallel together to the injection well?
11. Explain if the CGP-1 Cryogenic Gas Plant and EHPP Cal Capture project would use the same injection well.

REFERENCES

SJVAPCD 2025 - San Joaquin Valley Air Pollution Control District – Carbon TerraVault I Project Voluntary Emission Reduction Agreement (20250167). August 21, 2025. Available online: https://ww2.valleyair.org/media/id4ol3fh/item-24_-approve-vera-with-california-resources-corporation-to-mitigate-air-quality-impacts.pdf.