

Michael J. Carroll
 Marc T. Campopiano
 LATHAM & WATKINS LLP
 650 Town Center Drive, Suite 2000
 Costa Mesa, CA 92626
 (714) 540-1235

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STATE OF CALIFORNIA
 ENERGY RESOURCES
 CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of:)	Docket No. 08-AFC-8
)	
REVISED APPLICATION FOR CERTIFICATION FOR THE HYDROGEN ENERGY CALIFORNIA POWER PLANT PROJECT ("HECA"))	OBJECTIONS TO MARCH 16, 2012 DATA REQUESTS
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On March 16, 2012, California Energy Commission ("CEC") staff issued data requests in the above-referenced matter that were jointly developed by the CEC staff and the California Department of Conservation, Division of Oil, Gas and Geothermal Resources ("DOGGR") staff (Docket Log # 64176). The data requests seek information from the Applicant and/or Occidental of Elk Hills, Inc. ("OEHI") related primarily to OEHI's utilization of CO₂ for enhanced oil recovery ("EOR"). The Applicant and OEHI will require additional time beyond the proscribed 30-day period to respond to the data requests and, subject to the objections set forth below, will provide responses to the data requests by May 25, 2012.

In addition, the Applicant and OEHI have certain objections to the data requests, as more specifically set forth below. The primary objection is to the scope of certain of the data requests. OEHI has contacted DOGGR directly to seek clarification on the intended scope of the data requests, but Applicant is also filing this objection as required by 20 CCR 1716(f). It is anticipated that further discussion amongst OEHI, Applicant, CEC and DOGGR will result in clarification of the scope of the data requests and resolution of most of substantive objections set forth below. There is also one objection based on business confidential information that we do not expect to be resolved, but OEHI believes that the requested information is not relevant in any event. The specific objections are as follows:

DR 1: The request to include every injection well OEHI intends to drill for using CO₂ procured from HECA is overly broad, as the CO₂ will be procured for approximately 20 years and the information gained from early phases of the EOR project will be used to determine the patterns

of wells needed for later phases. OEHI expects to be able to provide the requested information for the first phase of injection wells.

DR 2d: For the reasons discussed above, the request for casing diagrams for all wells affected by the 20 year project is overly broad. OEHI expects to be able to prepare and provide casing diagrams for all wells affected by the first phase of the project.

DR 2h: The amount of CO₂ injected to recover a barrel of oil would be competitively sensitive information. Furthermore, this information is not relevant to the suitability of the Stevens reservoirs to produce oil from EOR while simultaneously trapping CO₂.

DATED: April 6, 2012

Respectfully submitted,

/s/ Michael Carroll

Michael J. Carroll
LATHAM & WATKINS LLP
Counsel to Applicant