

**PETITION TO UNDERTAKE INSIGNICANT CHANGE IN
THE PROJECT RELATING TO REPLACING A PORTION
OF THE WATER PIPELINE SUPPORTS**

**ELK HILLS POWER PLANT
(99-AFC-1C)**

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DATE	MAR 1 8 2008
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**By:
ELK HILLS POWER, LLC**

Submitted to:

CALIFORNIA ENERGY COMMISSION

March , 2008

PETITION TO UNDERTAKE INSIGNICANT CHANGE IN THE PROJECT RELATING TO REPLACING A PORTION OF THE WATER PIPELINE SUPPORTS

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1.0 INTRODUCTION

Elk Hills Power, LLC (Elk Hills) is submitting this request to undertake replacement of 20 the supports underlying the water pipeline which delivers water to the project from the West Kern Water District. Cooling and process water is conveyed by this 16" pipeline from a pump station east of the Elk Hills oil field property to the power plant site. The pipeline, owned by West Kern Water District, is about 10 miles long and is primarily located within a pipeline right-of-way owned by Occidental of Elk Hills. An easement was granted to Elk Hills by Occidental of Elk Hills within this pipeline corridor during development of the Elks Hills Power Plant project.

2.0 DESCRIPTION OF PROPOSED MODIFICATION (Sec. 1769(a)(1)(A))

Elk Hills needs to replace 20 supports underlying approximately 1000 feet of the existing 10 mile water line. Some of these supports have slipped and required prior maintenance. The existing block supports will be replaced by metal pipe supports set in poured concrete foundations. The pipeline will be moved about 5 feet in some areas to provide greater separation from other pipelines in the same right of way. An existing maintenance road paralleling the pipeline right-of-way will be used to provide access for a hole auguring rig and other construction equipment. The location of the replacement work is within a portion of the oil field designated as section 33S. An aerial map, photos of the work sites, design drawings concerning the new supports, and an overview map of the Elk Hills oil field showing location of section 33S have previously been provided to Commission Compliance Project Manager and are attached. The work was previously

scheduled to begin April 1st and is estimated to require about 1.5 months to complete. No change of any Condition of Certification is requested.

3.0 NECESSITY (Sec. 1769(a)(1)(B))

The replacement work is necessary to maintain stability of the water pipeline and insure required separation from adjacent lines in accordance with Department of Transportation safety requirements.

4.0 TIMING (Sec. 1769(a)(1)(C) and (D))

The requested project work was not known to the petitioner during the licensing proceeding since it relates to an unforeseen need for maintenance in this specific area. The changes do not undermine the assumptions, rationale, findings, or other bases of the final decision. No conditions of certification are changed and the work will result in minimal environmental impacts.

5.0 ANALYSIS OF THE EFFECT OF THE MODIFICATIONS ON THE ENVIRONMENT (Sec. 1769(a)(1)(E))

The changes will not cause any significant changes in the environment requiring mitigation. Please see summary analysis table below.

TECHNICAL AREA	SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?		NOTES
AIR QUALITY		N	
CULTURAL RESOURCES		N	Area for construction is largely previously disturbed. There are no previously identified cultural sites within the construction area.
HAZARDOUS MATERIALS HANDLING		N	Limited quantities of hazardous material used in the project will be managed in accordance with all applicable requirements

LAND USE		N	
NOISE		N	
PALEONTOLOGICAL RESOURCES		N	Area for construction is largely previously disturbed.
BIOLOGICAL RESOURCES		N	Area for construction is largely previously disturbed. Pre-construction survey has been conducted and found no significant biological sources present. Work will conform to BRMIMP.
PUBLIC HEALTH		N	
RELIABILITY		N	More stable line improves reliability of plant.
SOCIOECONOMICS		N	
SOILS		N	No impact. Soil disturbance limited to mobile auguring rig operation for support holes.
TRAFFIC AND TRANSPORTATION		N	Support replacement will enhance DOT safety for nearby hydrocarbon lines.
T-LINE SAFETY AND NUISANCE		N	
TRANSMISSION SYSTEM ENGINEERING		N	
VISUAL RESOURCES		N	
WASTE MANAGEMENT		N	No hazardous waste is expected to be generated during the line support replacement. In the unlikely event contaminated soil is discovered during construction it will be handled in accordance with applicable state and federal hazardous waste law requirements.
WATER RESOURCES		N	

WORKER SAFETY		N	
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6.0 COMPLIANCE WITH LAWS, ORDINANCES, REGULATIONS AND STANDARDS (LORS) (Sec. 1769(a)(1)(F))

The replacement activities will be conducted consistent with currently applicable LORS.

7.0 POTENTIAL EFFECTS ON PUBLIC AND NEARBY PROPERTY OWNERS (Sec. 1769(a)(1)(G and I))

The requested modification will not have significant adverse environmental impacts and will comply with all applicable LORS. Thus, the proposed equipment change is not anticipated to affect nearby property owners or parties in the application proceedings or the public.

8.0 LIST OF PROPERTY OWNERS (Sec. 1769(a)(1)(H))

There is only one property owner within 1,000 feet of the plant site. That is Occidental of Elk Hills, 28590 HWY 119 Tupman, CA 93276.

9.0 SUMMARY OF REQUEST


The water line support replacement project is a small scale project which will not have an adverse effect on the public or the environment. The change will not affect compliance with applicable LORS. Accordingly, Elk Hills Power requests that the Energy Commission Staff expedite review of this petition, and requests Commission staff approval of the proposed modified conditions in accordance with Title 20 CCR Section

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1769. Elk Hills suggests that this petition qualifies for treatment as an insignificant project change.

Dated: March 18, 2008

Respectfully Submitted,



Taylor O. Miller
Counsel to Elk Hills Power

