

## DEPARTMENT OF CONSERVATION

Managing California's Working Lands

Division of Oil, Gas, & Geothermal Resources

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November 27, 2012

California Energy Commission Dockets Unit, MS-4 Docket No. 12-CAI-04 1516 Ninth Street Sacramento, CA 95814-5512



Dear Sir/Madame:

The Department of Conservation, Division of Oil, Gas, and Geothermal Resources (Division) regulates the drilling, operation, and plugging and abandonment of geothermal wells in California. The Division currently regulates the twenty-one geothermal wells operated by Bottle Rock Power LLC in The Geysers Geothermal field.

The Division currently holds a \$100,000 blanket bond to indemnify the state in the case that Bottle Rock Power LLC could not properly plug and abandon their wells at such time that this action became necessary or when the power plant ceased operations. Although this is a security for the state, this amount is not adequate to plug and abandon the twenty-one wells and accompanying pipelines. We estimate that this work may cost over \$2,000,000.

When the Commission is evaluating the deletion of sections 2.4 and 2.5 from the existing purchase agreement for the transfer of ownership of the Bottle Rock geothermal plant and wells from Department of Water Resources to Bottle Rock Power LLC this fact should be noted and taken into consideration.

If you have any questions, please contact Elizabeth Johnson, Geothermal Officer, at 916-323-1786.

Sincerely,

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Robert S. Habel Chief Deputy

The Department of Conservation's mission is to balance today's needs with tomorrow's challenges and foster intelligent, sustainable, and efficient use of California's energy, land, and mineral resources.