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

ELK HILLS POWER PLANT

(99-AFC-IC)

By:
ELK HILLS POWER, LLC

Submitted to:
CALIFORNIA ENERGY COMMISSION

March, 2008
1.0 INTRODUCTION

Elk Hills Power, LLC (Elk Hills) is submitting this request to undertake replacement of 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.

<table>
<thead>
<tr>
<th>TECHNICAL AREA</th>
<th>SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?</th>
<th>NOTES</th>
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<tbody>
<tr>
<td>AIR QUALITY</td>
<td>N</td>
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<tr>
<td>CULTURAL RESOURCES</td>
<td>N</td>
<td>Area for construction is largely previously disturbed. There are no previously identified cultural sites within the construction area.</td>
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<tr>
<td>HAZARDOUS MATERIALS HANDLING</td>
<td>N</td>
<td>Limited quantities of hazardous material used in the project will be managed in accordance with all applicable requirements</td>
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**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
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
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
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<th>DRAWING NO.</th>
<th>SHEET</th>
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TITLE SHEET AND DRAWING INDEX -- MECHANICAL
16" WATER LINE MODIFICATIONS
ELK HILLS POWER
TJC# 07552

ELK HILLS FIELD
OCCIDENTAL OF ELK HILLS, INC.
UNIT OPERATOR
TJC# 07552
ELK HILLS POWER
16" WATER LINE
TITLE SHEET & DRAWING INDEX -- MECHANICAL
SK-07552-01
1/22/1990
HON
NEW PIPE SUPPORT
(98 FEET MIN.
SPAN)
16" WATER LINE (EXIST)
16" INSULATED LINE (EXIST)
16" WATER LINE (PROPOSED)
12" LINE (EXIST.)

1. CONTRACTOR SHALL run VERIFIED DIMENSIONS AND COORDINATES BEFORE CONSTRUCTION. ALL CONSTRUCTION IS AT ELK HILLS POWER AND OXY CONSTRUCTION REPRESENTATIVE.

2. CONTRACTOR CANNOT CONFIRM MANY ASPECTS OF CONSTRUCTION INSTALLATION, AND RELIES ON THE CONTRACTOR'S JOB SITE VERIFICATION, PROJECT RESEARCH, AND SAFETY PRACTICES TO INSURE THE APPROPRIATE LINE-UP IS PERFORMED.

3. CONTRACTOR SHALL USE ALL APPLICABLE INDUSTRY STANDARD SAFETY PRECAUTIONS AND PRACTICES, INCLUDING ELK HILLS POWER AND OXY APPROVED JOB SAFETY PLAN, TO VERIFY LINE-UP SUITABILITY PRIOR TO COMMENCING CONSTRUCTION.

4. ALL WORK SHALL COMPLY WITH ALL APPLICABLE ELK HILLS POWER AND OXY SPECIFICATIONS. NEW FACILITIES AND MODIFICATIONS TO EXISTING FACILITIES SHALL MEET THE SAFETY REQUIREMENTS OF ELK HILLS POWER AND OXY SAFETY MANUAL, APPROVED SAFETY PLAN, AND SAFE PRACTICES GUIDELINES.

5. CONTRACTOR SHALL BE RESPONSIBLE FOR LOCATION AND CONFORMITY OF ALL UNDERGROUND AND OFFSET UTILITIES PRIOR TO EXCAVATION. CONTRACTOR SHALL EXERCISE PROPER CARE DURING EXCAVATION.
1. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS AND COORDINATES BEFORE CONSTRUCTION. ALL INTERFERENCES SHALL BE BROUGHT TO THE ATTENTION OF ELK HILLS POWER AND OXY CONSTRUCTION REPRESENTATIVES.

2. T. J. CROSS ENGINEERS CANNOT VERIFY MANY ASPECTS OF CONSTRUCTION INSTALLATION, AND RESPONSIBILITY FOR THE CONTRACTOR'S JOB SITE VERIFICATION, PROJECT RESEARCH, AND SAFETY PRACTICES TO INSURE THE APPROPRIATE TIE-IN IS PERFORMED.

3. CONTRACTOR SHALL USE THE APPROPRIATE INDUSTRY STANDARD SAFETY PRECAUTIONS AND PRACTICES, INCLUDING ELK HILLS POWER AND OXY APPROVED JOB SAFETY PLAN, TO VERIFY UNET TIE-IN SUITABILITY PRIOR TO COMMENCING CONSTRUCTION.

4. CONTRACTOR SHALL BE RESPONSIBLE FOR LOCATION AND CONFIRMATION OF ALL UNDERGROUND AND OFFSET UTILITIES PRIOR TO EXCAVATION. CONTRACTOR SHALL REFER DURING EXCAVATION.

SECTION "G"
LOOKING EAST
SK-07552-02

PORTION OF EARTH TO BE CUT IF NECESSARY

TOP OF PIER TO BE ABOVE EXISTING GRADE

SECTION "H"
LOOKING EAST
SK-07552-02
1. CONTRACTOR SHALL VERIFY ANY DIMENSIONS AND COORDINATES BEFORE CONSTRUCTION. All measurements shall be verified by Elk Hills Power and City Construction. (Fig. 1)

2. All cross-country conveyance and underground locations shall be verified by Elk Hills Power and City Construction. Contractor samples are to be measured and marked by Elk Hills Power and City Construction. (Fig. 2)

3. All work shall be approved by Elk Hills Power and City Construction. All work shall be approved and verified by Elk Hills Power and City Construction. (Fig. 3)

4. CONTRACTOR SHALL BE RESPONSIBLE FOR LOCATION AND CONSTRUCTION OF ALL UNDERGROUND AND OFFSET UTILITIES PRIOR TO EXCAVATION. CONTRACTOR SHALL EXERCISE PROPER CARE DURING EXCAVATION. (Fig. 4)

5. MAXIMUM PIPE SUPPORT SPAN FOR 16" WATER LINE SHALL BE 40 FEET. PIPE SUPPORT SHALL BE PLACED ON SUITABLE LOCATION BASED ON ACTUAL SITE CONDITION. (Fig. 5)

ELK HILLS FIELD
OCCIDENTAL OF ELK HILLS, INC.
UNIT OPERATOR
TJK# 07552
ELK HILLS POWER
16" WATER LINE
PIPING DETAIL "F"
1. Contractor shall field verify all dimensions and coordinates before construction. All measurements shall be checked to the nearest 1/16" by Elk Hills Power and OXY Construction Representative.

2. Contractor shall use all applicable industry standard safety precautions and practices, including Elk Hills Power and OXY approved job safety plan, to verify line suitability prior to commencing construction.

3. All work shall conform to applicable OXY and Elk Hills Power project requirements, safety plan, and site procedures.

4. Contractor shall be responsible for location and continuation of all underground and offset utilities prior to excavation. Contractor shall exercise proper care during excavation.

5. Maximum pipe support span for 16" water line shall be 40 feet. Pipe support shall be placed on suitably reinforced concrete piers at a point midway between supports in a trench.
1. CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND COORDINATES BEFORE CONSTRUCTION. ALL INTERFERENCES SHALL BE BROUGHT TO THE ATTENTION OF ELK HILLS AND OCCUS CONSTRUCTION.

2. IF CROSS ENGINEERS CANNOT CONFIRM MANY ASPECTS OF CONSTRUCTION INSTALLATION, REQUIREMENTS ON THE CONTRACTOR'S SITE VERIFICATION, PROJECT RESEARCH, AND SAFETY PRACTICES TO ENSURE THE APPROPRIATE SITE IS PERFORMED.

3. CONTRACTOR SHALL USE ALL APPLICABLE INDUSTRY STANDARD SAFETY PRECAUTIONS AND PRACTICES, INCLUDING ELK HILLS POWER AND OXY APPROVED JOB SAFETY PLAN, TO VERIFY WEATHER SUITABILITY PRIOR TO COMMENCING CONSTRUCTION.

4. ALL WORK SHALL COMPLY WITH ALL APPLICABLE ELK HILLS POWER AND OCCUS SPECIFICATIONS. NEW FACILITIES AND MODIFICATIONS TO EXISTING FACILITIES SHALL MEET THE SAFETY REQUIREMENTS OF ELK HILLS POWER SAFETY MANUAL, APPROVED SAFETY PLAN, AND SAFE PRACTICE GUIDELINES.

5. CONTRACTOR SHALL BE RESPONSIBLE FOR LOCATION AND CONSTRUCTION OF UNDERGROUND AND OFFSET UTILITIES PRIOR TO EXCAVATION. CONTRACTOR SHALL PROVIDE A MINIMUM DISTANCE OF 5 FEET AWAY FROM ANY EXISTING PIPE SUPPORTS.
1. Contractor shall verify all dimensions and coordinates before construction. All measurements shall be verified by Elk Hill Power and Oxy Construction Representative.

2. Cross Engineers cannot confirm many aspects of construction installation, and relies on the Contractor's job verification, project research, and safety practices to insure the appropriate work is performed. Contractor shall use all applicable industry standard safety precautions and practices, including Elk Hill Power and Oxy-approved job safety plan, to verify site suitability prior to commencing construction.

3. All work shall comply with applicable Elk Hill Power and Oxy specifications. New facilities and modifications to existing facilities shall meet the safety requirements of Elk Hill Power and Oxy Safety Manual, approved safety plan, and safe practices guidelines.

4. Contractor shall be responsible for location and coordination of overhead and offset utilities prior to excavation. Contractor shall exercise proper care during excavation.

5. Maximum pipe support span for 16" water line shall be 42 feet. Pipe support shall be placed on suitable location based on actual site condition with a minimum distance of 5 feet away from any existing pipe supports.

6. No existing pipe support span for 16" line shall be 48 feet. No existing pipe support span for 16" line shall exceed 54 feet. Any support over 54 feet shall be verified by engineering.

7. No existing pipe support span for 16" line shall be over 60 feet. Any support over 60 feet shall be verified by engineering.
1. CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND COORDINATES BEFORE CONSTRUCTION. ALL INFERENCES SHALL BE BROUGHT TO THE ATTENTION OF ELK HILLS POWER AND CITY CONSTRUCTION REPRESENTATIVES.

2. ALL WORK SHALL BE CONFIRMED PRIOR TO CONSTRUCTION INITIATION, AND REVISIONS ON THE CONTRACTOR’S JOB SITE VERIFICATION, PROJECT RESEARCH, AND SAFETY PRACTICES TO INSURE THE APPROPRIATE WORK IS PERFORMED. CONTRACTOR SHALL USE ALL APPLICABLE INDUSTRY STANDARD SAFETY PRECAUTIONS AND PRACTICES, INCLUDING ELK HILLS POWER AND OXY APPROVED JOB SAFETY PLAN, TO VERIFY WORK SUITABILITY PRIOR TO COMMENCING CONSTRUCTION.

3. ALL WORK SHALL COMPLY WITH ALL SPECIFICATIONS. NEW FACILITIES AND MODIFICATIONS TO EXISTING FACILITIES SHALL MEET THE SAFETY REQUIREMENTS OF ELK HILLS POWER AND CITY SAFETY MANUAL, APPROVED SAFETY PLAN, AND SAFE PRACTICE GUIDELINES.

4. CONTRACTOR SHALL BE RESPONSIBLE FOR LOCATION AND CONFIRMATION OF ALL UNDERGROUND AND OFFSET UTILITIES PRIOR TO EXCAVATION. CONTRACTOR SHALL EXERCISE PROPER CARE DURING EXCAVATION.

5. MAXIMUM PIPE SUPPORT SPAN FOR 16" PIPE SHALL BE 411 FEET. PIPE SUPPORT SHALL BE PLACED ON SUITABLE LOCATION BASED ON ACTUAL SITE CONDITION WITH A MINIMUM DISTANCE OF 5 FEET AWAY FROM ANY EXISTING PIPE SUPPORTS.
1. CONTRACTOR SHALL FIELD VERIFY ALL SURFACES AND COORDINATES BEFORE CONSTRUCTION, AS INCOMPATIBLES SHALL BE INSTRUCTED TO THE AGENCY OF ELK HILLS AND CITY CONSTRUCTION FOR THE LAST DETAILED FIELD VERIFICATION AND COORDINITION. CONTRACTOR SHALL FIELD VERIFY ALL SURFACES AND COORDINATIONS FOR THE LAST DETAILED FIELD VERIFICATION AND COORDINATION. CONTRACTOR SHALL FIELD VERIFY ALL SURFACES AND COORDINATIONS FOR THE LAST DETAILED FIELD VERIFICATION AND COORDINATION.

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1. Contractor shall field verify all dimensions and coordinates before construction. All interferences shall be brought to the attention of Elk Hill's Power and Oxygen Construction Representative.

2. T. J. Cross Engineers cannot confirm many aspects of construction installation, and relies on the contractor's job site verification, project research, and safety practices to insure the appropriate tie-in is performed. Contractor(s) shall use applicable industry standard safety precautions and practices, including Elk Hills Power and Oxygen's approved job safety plan, to verify the suitability prior to commencing construction.

3. All markers shall comply with applicable Elk Hills Power and Oxygen specifications. New finds and modifications to existing facilities shall meet the safety requirements of Elk Hills Power and Oxygen's safety manual, approved safety plan, and safe practices guide

4. Contractor shall be responsible for location and coordination of all underground and offset utilities prior to excavation. Contractor shall monitor care during excavation.

5. Pipe support type (centered or offset) shall be selected according to site conditions suitability.

NOTE 5: 1/2",

1/2" WATER LINE

OFFSET PIPE SUPPORT (NOTE 5)

CENTERED PIPE SUPPORT (NOTE 5)
OCCIDENTAL OF ELK HILLS, INC.
MAJOR FACILITIES MAP

Legend
Stevens Crude
SOZ Crude
Stevens Gas
SOZ Gas
Stevens Injection
Stevens Water Flood
Multiple Zone / Function
Checkpoints
Field Telephone

Torch