

DOCKETED

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August 3, 2017

Kenneth A. Harris, Jr.
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Michael Picker
President
California Public Utilities Commission
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San Francisco, California 94102

Robert B. Weisenmiller, Ph.D.
Chair
California Energy Commission
1516 Ninth Street, MS-29
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Dear Mr. Harris, Mr. Picker, and Dr. Weisenmiller:

I write today to share my strong belief that Aliso Canyon should be shut down. As you are aware, for reasons that still remain unclear, on October 23, 2015, a massive blowout occurred at well SS25, causing one of the largest natural gas leaks in U.S. history, emitting over 109,000 metric tons of methane into the atmosphere. Over the course of four months, some 8,000 families in the Northwestern San Fernando Valley were driven from their homes, schools were relocated, small businesses suffered, and thousands experienced nausea, headaches, nosebleeds and other adverse health effects as a direct result of the leak. Any long-term health effects that may have resulted from the leak have yet to be realized. In light of this disaster, we all have a special responsibility to ensure the well-being of the residents of the San Fernando Valley. This is why I remain steadfast in my strong belief that the most responsible course of action is to permanently shut down the facility.

Aliso Canyon was converted to a natural gas storage facility in 1973. Well SS-25, which caused this disastrous leak, was first commissioned in 1953. It is particularly concerning that 37 of the 115 wells on the site are older than SS25. It is my understanding that a root cause analysis identifying what exactly occurred on October 23, 2015, has yet to be completed. What we do know is that damage to the external well casing, which was being used to convey natural gas

instead of as a failsafe for the internal piping, leaked an enormous quantity of gas into the rock formation around the well in a way that resisted efforts to seal the well for months.

As if the age of the wells at Aliso Canyon is not alarming enough, the entire facility is located directly above the Santa Susanna fault, which crosses through all of the natural gas wells on the site. Southern California Gas' own Storage Risk Management plan anticipates that the area around Aliso Canyon has a high probability of experiencing a major earthquake in the next 50 years. In fact, a different area along the same Santa Susanna fault ruptured nearby in 1973 during the San Fernando Earthquake. Additionally, Aliso Canyon suffered damage during the 1994 Northridge Earthquake in which well SSI40 collapsed, but fortunately did not leak at that time. I remain gravely concerned about the potential impacts of a major earthquake on the safety of the Aliso Canyon underground natural gas storage facility. This question has taken on renewed urgency now that reinjection of natural gas at the facility resumed this week, following approval from the Division of Oil, Gas, and Geothermal Resources (DOGGR).

In December 2016, experts at Lawrence Berkeley, Lawrence Livermore, and Sandia National Laboratories wrote to DOGGR recommending formal, site-specific seismic hazard and fault displacement analyses. In February of this year, a California State University, Northridge professor raised similar concerns and asked DOGGR to investigate fault slippage at Aliso Canyon before reaching any conclusion on the safety of reopening the facility. More recently, it was reported as part of a lawsuit filed by Los Angeles County that a former manager at Southern California Edison has warned DOGGR of potentially "catastrophic loss of life" at the facility should an earthquake sever multiple wells at once.

I understand that DOGGR's analysis of the safety of the facility is based on thorough inspection of the current state of repair for each well, but this does little to reduce the risk that an earthquake could cause new damage to multiple wells simultaneously. DOGGR has also prohibited the movement of natural gas through the concrete casing, which is an important failsafe in case the interior piping fails, but which would be of little help in the event that both the interior piping and the exterior casing are sheared by an earthquake. It is clear that additional study is needed to properly understand the geology of the area and how it might affect the remaining natural gas wells at Aliso Canyon.

During and following the gas leak at Aliso Canyon, my office has received numerous reports from San Fernando Valley residents complaining of symptoms that they believe are a direct result of living near the largest natural gas storage facility in the state. It is clear to me that the adverse health effects from being exposed to such large volumes of natural gas warrant further study. Additional research into the consequential health effects experienced by residents is needed to provide long-term health support to this community.

Given your agencies' responsibility for regulating the Aliso Canyon facility and ensuring the safety of nearby residents, I would appreciate your timely response to the following questions:

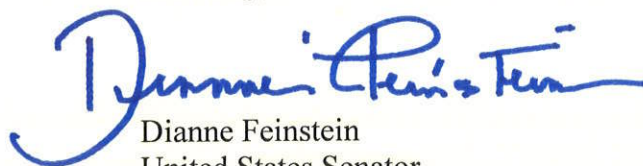
- What is the current state of knowledge about the seismic risks at the Aliso Canyon facility, and how fault slippage at the site would likely damage the natural gas wells?

- In the event of an earthquake, what safety mechanisms are in place to prevent or contain multiple well failures at the Aliso Canyon storage facility?
- DOGGR has required all underground storage facilities in the state to undertake better risk management planning, including analysis of seismic risks. What timetable and level of detail do you expect for the Aliso Canyon risk management plan?
- Why did DOGGR and the CPUC decide not to require a complete seismic risk analysis of Aliso Canyon before certifying the operating safety of the overall facility?
- How has DOGGR responded to concerns raised by the California State University at Northridge professor, the former Southern California Gas employee, and others?
- What is the status of the root cause analysis of the well failure at Aliso Canyon?
- What, if any, studies have been conducted to understand the long-term health effects of living near a massive natural gas facility that is prone to leaks? Have any studies investigated the health challenges of Porter Ranch and other San Fernando Valley residents as a result of the natural gas leak?

The Aliso Canyon facility is incompatible with our long-term climate goals. The time has come for Southern California to stop relying on large facilities that are prone to single points of failure. Based on the concerns that I have outlined in this letter, and the concerns of the residents of San Fernando Valley, I believe Aliso Canyon should have remained shut down. I agree with Governor Brown's recent instruction to the California Energy Commission to plan for the permanent closure of Aliso Canyon, and urge you to take every step necessary to close the facility as quickly as possible.

This is an issue of great importance to me and to the residents that live near Aliso Canyon. I have appreciated your commitment to careful analysis and clear public communications, and I look forward to a thorough response to these questions.

Sincerely,



Dianne Feinstein
United States Senator