

## DOCKETED

<b>Docket Number:</b>	17-IEPR-11
<b>Project Title:</b>	Southern California Energy Reliability
<b>TN #:</b>	222135
<b>Document Title:</b>	1.10.18_PRNC_Letter_to_Chair_Weisenmiller
<b>Description:</b>	1.10.18_PRNC_Letter_to_Chair_Weisenmiller
<b>Filer:</b>	Raquel Kravitz
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	1/12/2018 7:51:48 AM
<b>Docketed Date:</b>	1/12/2018



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January 10, 2018

Dr. Robert Weisenmiller, Chair  
California Energy Commission  
1516 Ninth Street, MS 33  
Sacramento, California 95814-5512

Dear Chair Weisenmiller:<sup>1</sup>

The Porter Ranch Neighborhood Council (PRNC) thanks you for your efforts and those of the California Energy Commission (CEC) in helping our community navigate the challenges forced upon us by the Aliso Canyon gas storage facility. On July 19 of this past year, you sent a letter to Mr. Michael Picker, President of the California Public Utilities Commission (CPUC), noting the Governor's request for the CEC to "...*plan for the permanent closure of the Aliso Canyon natural gas storage facility*", and urging the CPUC to do the same. We are writing to you today to check on the status of the Aliso Canyon facility closure plan, and to express our strong desire to participate in its implementation.

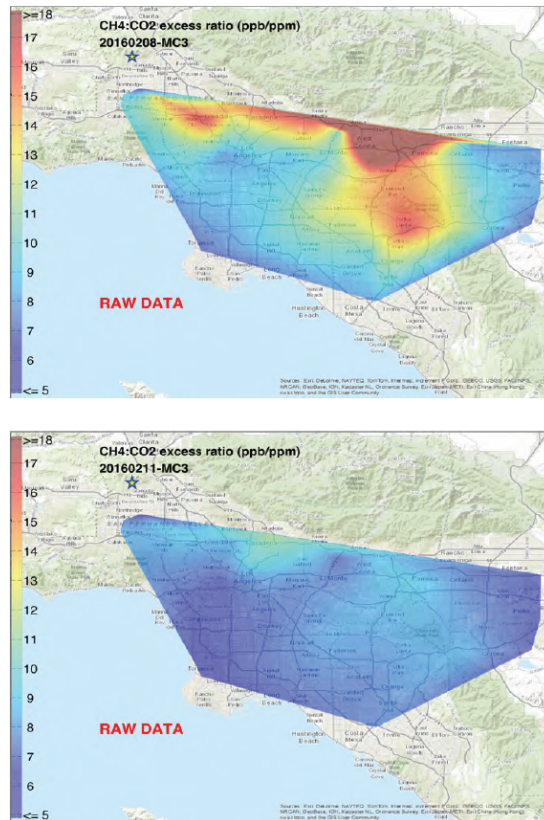
The difficulty of developing such a plan and the challenges it poses are not lost on us, and we understand that changes in the supply and demand portfolios must be made to achieve this goal. But we submit to you that this action is critically necessary. The consequences of the catastrophic failure of the well at the Aliso Canyon facility in October 2015 were clearly not anticipated by anyone. The staffs of the Southern California Gas Company (SoCalGas), the State's Division of Gas and Geothermal Resources (DOGGR), and CPUC, all expected to stop the discharge of the gas within a few days. Now we all know that they were incorrect. In fact, not only was it impossible to stop the discharge from the well, but it took four months of drilling a relief well to the bottom of the failed well in order to plug it. The toll on the community was enormous. Thousands of people had to be evacuated for months on end. We cannot think of a single event in California history that has resulted in such a mass evacuation of an urban population for such a long duration. Regardless of where one stands on this issue, this catastrophic event clearly demonstrated that these underground facilities are not compatible with urban environments, especially in the most seismically active region of the country.

We also wish to impress on you that in the course of normal operation of the facility, it releases tons of gas and other harmful chemicals into the air on a continuous basis. This has been clearly documented by multiple flyovers conducted above the field since February 2016 even as the facility remains in a standby mode.<sup>2</sup> We do not want to think what those levels were when the facility was in full operation right next to our homes. That is what we are trying to avoid by asking for the permanent closure of the facility. In December alone, the community was exposed to two separate leaks, which SoCalGas simply explained to be the result of routine maintenance.

<sup>1</sup> This letter represents the opinion of the PRNC, and not necessarily that of the City of Los Angeles.

<sup>2</sup> [https://www.arb.ca.gov/research/methane/natural\\_gas\\_storage\\_survey.htm](https://www.arb.ca.gov/research/methane/natural_gas_storage_survey.htm)

The impact of the Aliso Canyon well failure was not limited to our community, but extended to the entire Los Angeles basin. This was clearly demonstrated by JPL research, which is being conducted under the leadership of the CEC and the California Air Resources Board (CARB). Figure 1 shows two maps of the methane:CO<sub>2</sub> ratio in the LA basin on February 8, 2016 (top) and February 11, 2016 (bottom).<sup>3</sup> The “star” symbol shows the location of the ruptured SS-25 well at Aliso Canyon. The map coverage is limited to the area shown because its boundaries were designed to focus on the urban releases in the LA Basin, not on the Aliso Canyon’s release. Recognizing that SS-25 was finally capped on the morning of February 11, 2016, the comparison between the two maps is an ominous demonstration of the significance of the well blowout and how far its impact reached. Furthermore, while this comparison is focused on methane because it is the only measurable gas component using these sensing instruments, we should not forget that this plume included countless harmful chemicals, many of which SoCalGas refuses to identify. Figure 1 clearly demonstrates that a well rupture in Aliso Canyon should be of concern to everyone living in the LA basin.



**Figure 1 – Methane:CO<sub>2</sub> ratio in the LA basin on February 8, 2016 (top) and February 11, 2016 (bottom). The “star” symbol shows the location of the ruptured SS-25 well at Aliso Canyon. SS-25 was capped on the morning of February 11, 2016**

Opponents of the call to close the facility argue that it is needed for the reliability of the region’s gas supply. We submit to you that concentrating so much of the State’s gas supply in one location is the exact opposite of what is needed to ensure gas supply reliability when the failure

<sup>3</sup> Duren et al. (2017). *California Baseline Methane Survey Interim Phase 1 Report*, prepared by JPL for CARB and CEC. Obtained from: [https://www.arb.ca.gov/research/methane/CA\\_CH4\\_Survey\\_Phase1\\_Report\\_2017.pdf](https://www.arb.ca.gov/research/methane/CA_CH4_Survey_Phase1_Report_2017.pdf)

of one well results in the loss of the entire storage field. The system needs greater redundancy and more distributed storage; not more concentrated storage as we have now.

We are certain that the catastrophic effect of the Aliso Canyon blowout on the environment is not lost on anyone. The following was stated by Conley et al. (2016) in their article in *Science* about the Aliso Canyon gas blowout:<sup>4</sup>

*“The radiative forcing from this amount of [methane], integrated over the next 100 years, is equal to that from the annual [Green House Gas] emissions of 572,000 passenger cars in the United States. The volume of [methane] released represents only 3% of the total capacity of the Aliso Canyon storage facility, raising the possibility of substantial additional emissions if the leaking SS-25 well had not been sealed, or if the remaining natural gas had not been withdrawn through other wells, before the reservoir was completely exhausted to the atmosphere.”*

Under the leadership of the CEC, the CPUC, and the Los Angeles Department of Water & Power (LADWP), great headway has been made in lowering the regional demand for gas. Advancements in the harvesting of renewable energy, coupled with innovations in energy storage technologies, have already greatly reduced the State’s reliance on fossil fuel. We strongly believe that continuing this course of action as well as taking measures to increase and improve the reliability of the pipeline transmission of gas into the region will greatly facilitate the implementation of the Governor’s call for the closure of the Aliso Canyon facility, and to that end, all urban storage fields that pose an immediate and undeniable threat to the health and wellbeing of millions of Californians.

We look forward to seeing the CEC’s plan for the closure of the Aliso Canyon facility, and engaging with you on its implementation.

Sincerely,  
Porter Ranch Neighborhood Council



Issam Najm, Ph.D., P.E.  
President

cc: Mr. Kevin De León, President Pro Tempore, California State Senate  
Mr. Anthony Rendon, Speaker of the Assembly, California State Assembly  
Mr. Henry Stern, California State Senator, District 27  
Mr. Dante Acosta, California Assemblyman, District 38  
Ms. Nancy McFadden, Executive Secretary to California Governor Edmund G. Brown, Jr.  
Mr. Richard Corey, Executive Director, California Air Resources Board  
Mr. Michael Picker, President, California Public Utilities Commission  
Mr. Timothy Sullivan, Executive Director, CPUC  
Ms. Kathryn Barger, Los Angeles County Supervisor  
Mr. Angelo Bellomo, Los Angeles County Department of Public Health  
Mr. Wayne Nastri, Executive Director, South Coast Air Quality Management District  
Mr. Mitchell Englander, Los Angeles City Councilman  
Mr. Eric Garcetti, Mayor, City of Los Angeles

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<sup>4</sup> Conley et al. (2016). Methane emissions from the 2015 Aliso Canyon blowout in Los Angeles, CA, *Science*.