

DOCKETED

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HECA - Kern County Oppose

Additional submitted attachment is included below.

Fred Pozzuto - HECA - Kern County Oppose

From: Renee Nelson <idealfellow99@gmail.com>
To: <fred.pozzuto@netl.doe.gov>
Date: 10/1/2013 1:24 PM
Subject: HECA - Kern County Oppose
Attachments: HECA Comment letter9.13.doc

Dear Mr. Pozzuto,

Please find an attachment of my comment letter sent to the CEC staff in California and copied to you. Thank you for your time and attention to this matter.

I oppose this project for the reasons listed and many others. Coal is not now, has never been and the rate we are going, will never be clean. Living in a highly polluted air basin, I formally request this project be rejected as inappropriate in terms of siting. Thank you.

Renee Donato Nelson
President
Clean Water and Air Matter (CWAM)
Bakersfield, California

Hydrogen Energy California (HECA)
California Energy Commission
Docket # 08-AFC-8A
Date: September 30, 2013
Attn: Blake Roberts

Transmitted via e-comment: 3 pages

Dear Mr. Roberts

This letter is to oppose the placement/location of the proposed HECA project for numerous reasons. After studying the documentation for the project, there are numerous flaws in the logic for the siting of this project, which under the California Environmental Quality Act, is cause for refusal by a lead agency to permit.

My understanding from reviewing the PSA/DEIS is that much information is still missing and has been requested by staff from the applicant. I am not clear how the document is being circulated for public review and comment with so many incomplete sections and missing information thus rendering the application technically incomplete!

When considering the health, safety and welfare of the community that will be affected by the placement of the project, please imagine your eyes are burning, red and watering. Your throat is scratchy and your lungs are congested and breathing is difficult. No, this is not a chemical "warfare" attack; rather it is a corporate chemical attack. Research indicates the significant health affects of highly contaminated and toxic air, which includes but are not limited to, lung disease, lung cancer, stroke, heart attack, numerous cancers (bladder cancer is directly correlated to diesel particulate-Harvard University Study 2006) and finally death, especially in days of extreme heat.

In this case two major components of life, necessary for human habitation on the planet will be effected detrimentally, air and water.

SEISMIC

Additionally, we have the unknown impacts that will be induced by the introduction of massive amounts of carbon dioxide on a daily basis known as the sequestration process and the resulting seismic movement from such large, continuous quantities of high pressure gas injection interspersed with water injection.

Not only are the applicants proposing to place the "demonstration" project in one of the most polluted air basins in the world, they are now, after change of ownership, proposing to ship in coal and "pet-coke" [refinery by-product] to burn and pump the captured amount of carbon dioxide into the ground, at a profit, as Occidental Petroleum (OXY) will buy this by-product and use it in the Elk Hills fields to loosen deeply buried heavy crude oil. **They already use this process here and in other areas of the United States. It is not an un-proven technology.**

OXY and other oil companies have used various and sundry methods for reviving “almost dry” fields for years. This process, under any name, injects a fluid or gas at high pressure into the ground at various depths, depending on the fields themselves. We know this system works. We don’t know how well or efficiently because this information is considered proprietary by the companies.

Furthermore, the Executive Summary on page 12 states in part, “ while OEHI has stated it can use as much carbon dioxide as HECA can produce, the stated life span of the OEHI operation (20 years) is shorter than the length of time HECA proposes to operate (25 years).” What happens to 5 years worth of Co2 that is not captured and bought by OXY?

If I understand the proposal, the government is going to fund private investment to import coal(a known carcinogen on diesel powered trains) and pet coke (a dirty by-product from an oil refinery), burn them in a gasification system, capturing the Co2 before most of it can escape (90% capture) in a highly polluted air district, sell the Co2 to a private company to inject into the ground in an seismically active region adjacent to the San Andreas Fault and in a sequential pattern running eastward towards the White Wolf Fault, along the southern perimeter of the San Joaquin Valley, otherwise known as the bowl that holds the air pollution surrounded my mountains on 3 sides. All this to make fertilizer, some electricity that the plant itself may or may not need, given its day to day production, and the plant may even need to import electricity to run its operations.

From page 1902, “ [In a semi-cumulative review] of OXY’s current sequestration practices, they state that the Co2 sequestration would be less than the quantities of water, steam and gas currently injected to increase oil production in the Elk Hills fields. Fluid injection is known to increase levels of small scale seismicity at other locations in the United States [thus proving this is not a true demonstration project – comment mine], although none have been documented at Elk Hills.”

Where is the documentation to either prove or disprove this statement? The data is available, as earthquakes have been tracked with better accuracy since the Northridge Earthquake in 1994. This data needs to be included for review. From a sample of Monday, September 30, 2013, approximately 608 earthquakes were recorded in the last week in California. Many are along the San Andreas Fault north of the proposed project site, indicating activity on the fault, while other earthquakes were happening in and around the White Wolf Fault, which skirts the Southern San Joaquin Valley and through a series of faults abuts the San Andreas Fault. (www.data.scec.org – an affiliation of USGS-Menlo Park, UC Berkeley, USGS-Pasadena, Caltech, UC San Diego, UN Reno and USGS/NEIC)

Documentation needs to review the cumulative effects of pumping an additional 2.6 million tons of gas into ground that has previously experienced subsidence in a highly active earthquake region. Review must include a correlation of depth of proposed injections (5,000 ft +/-) up to (10,000 ft +/-) in relation to the San Andreas Fault.

How will this affect the other numerous surface and subsurface faults in the region? Those include but are not limited to, White Wolf Fault, Garlock Fault (largest and most active in the region after the San Andreas), Wheeler Ridge Thrust, Pleito Thrust, Edison Fault, Springs Fault, and the Pastoria Thrust.

What are the temporal and spatial relationships between the faults and proposed areas of injection? Is there interconnectivity between these areas? While some might argue this information is proprietary, when a project takes government money to fund the project, the information becomes a basic part of the documentation of the project and basic information has been provided to DOGGR.

Finally, cumulative effects must be analyzed for this and other proposed and or approved projects in the region. The County of Kern has approved numerous Solar projects, one just 3 miles northwest of the White Wolf Fault [FRV Orion Solar], which would pile drive steel beams into the earth. Any of these activities could trigger seismic action. Put them all together and we just might be the ones to split California into the ocean! Which is something I never thought possible until I started to review these so-called energy production projects.

LOCAL PERMITS

The PSA/DEIS mentions the need for the County of Kern to issue a conditional use permit for this project. What is the status of this procedure? Does the county understand the need to complete this action? When is it necessary to be completed?

Thank you for the opportunity to comment on this project. Please do not approve this project for the sake of all of California!

Sincerely,

Renee Donato Nelson
President
Clean Water and Air Matter (CWAM)
12430 Backdrop Court
Bakersfield, California 93306