

## DOCKETED

<b>Docket Number:</b>	08-AFC-08A
<b>Project Title:</b>	Hydrogen Energy Center Application for Certification Amendment
<b>TN #:</b>	207010
<b>Document Title:</b>	Do not reinstate AFC proceedings for HECA
<b>Description:</b>	Additional comments RE: infeasibility of HECA
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<b>Organization:</b>	HECA Neighbors
<b>Submitter Role:</b>	Intervenor
<b>Submission Date:</b>	12/14/2015 3:50:46 PM
<b>Docketed Date:</b>	12/14/2015

## Additional comments from HECA Neighbors on the feasibility of HECA 08 AFC 08A

Our members own mineral rights on three sides of HECA property. Under HECA's new proposal to sequester all the CO<sub>2</sub> on the site, we have property rights concerns questioning if HECA's site is feasible. Does HECA believe they have rights to our core space for the storage of their CO<sub>2</sub> without agreements and compensation with neighboring mineral rights holders? How realistic is it to assume an agreement can be reached with the neighbors that is economically viable, since most are opposed to HECA?

HECA Neighbors have concerns that the plume of millions of tons of HECA's CO<sub>2</sub> will TRESPASS to neighbor's properties. How feasible is it to assume that the CO<sub>2</sub> will be contained, indefinitely, within HECA's borders? How feasible is it to believe neighbors will be unconcerned with the liability of escaping CO<sub>2</sub> and it's damage to the crops?

Neighbors have concerns that seismic activity could be triggered by such pressurized sequestration. With the San Andreas Fault nearby, and the California aqueduct on our border, the concerns multiply! That raises the question of how wise and feasible is it to store CO<sub>2</sub> under a chemical factory. Could seismic activity allow the CO<sub>2</sub> to come back up, say, under their chemical storage areas?

Information on the dangers of chemical storage is still missing. Neighbors are still waiting to learn the danger to us and the school 1 1/2 miles downwind of HECA's almost 4,000,000 gallons of anhydrous ammonia. HECA hid under confidential cover the risks should the 4,000,000 gallons escape. We have asked to know at what concentrations and at what distances will our families and the students be safe. We have not received that information.

Please do not reinstate HECA's AFC. Please terminate them.

Chris Romanini  
HECA Neighbors