My public comment re mitigation for CARB

I strongly oppose the migitation plan outlined in the Aliso Canyon ascent decree announced on August 8, 2018.

Here are my reasons:

1. As SoCalGas is the utility that caused the release of methane (the largest in US history) during the 2015 blowout, I feel that it should not be involved in mitigation other than paying the fines.
2. The gas company has been actively seeking bids last year for the dairy digester project and has boasted about it in press releases. Surely when a company is being held accountable, it should not get any public relations credit for any actions they take when it has irreversibly hurt an area in which more than 1.5 million residents live.
3. SoCalGas intends to convert the methane emitted by the dairy cows into biomethane. It wants to transport it via pipelines, which will have to be specially constructed due to the corrosive nature of the chemical, and stored in Southern California. One storage site it wants to use is the Aliso Canyon site, which is the location of the damaged well that had caused the massive emissions. The other wells at that site are continuously leaking. Even an onsite manager had testified in 2016 that there was an average of two leaks daily at a time that the facility was offline due to SB-380. Now that the site is being used again for injection and withdrawals, there have been many leaks, including some that forced the SCAQMD to issue nuisance complaints as a result.
4. The Santa Susana earthquake fault transverses every well at the Aliso Canyon facility. If a major eruption occurs, the result will be “catastrophic” (and that’s a direct quote from James Mansdorfer, who sent an email to his bosses at SoCalGas eight years ago when he was a manager at the site).
5. Dr. Lucy Jones, a respected earthquake expert, has stated that there will be a major quake hitting Southern California within the next thirty years. She further stated that if the southern end of the San Andreas fault erupts, the resulting energy could set off faults in the area, including the Santa Susana fault.
6. A company which is being fined like this should not be able to profit from its violations. And SoCalGas intends to profit from selling the biomethane it collects from the project. To me, it’s like a driver causing a major accident, gets fined, but the state gives him money for a new car. In fact, the decree states a prohibition in appendix D that says the eligible projects from funds “not directly benefit SoCalGas, Sempra Energy, or subsidiaries of either.” This criterion should refer to ALL parts of the consent decree.
7. If SoCalGas, independent of this agreement, decides to fund its dairy digesters, the end product is not to be piped down to Southern California, or sent here in any way.
8. The plan listed in the consent decree is outlined as a ten-year project. But last year, Governor Brown had instructed the CPUC and the Dept. of Conservation to close down Aliso Canyon within ten years. Even if this dairy digesters plan starts immediately (and again, there needs to be a pipeline infrastructure build), the project will fail to meet that deadline.
9. Mitigation projects shouldn’t have the potential of causing more greenhouse pollution. If stored biomethane is leaked, the result will be adding methane to the Los Angeles basin. Any projects getting this funding should be ones that are not based on creating or reusing carbon materials, but ones that promote alternative and clean energy such as solar and wind.
10. The Aliso health study must be funded first, ahead of any other parts of this agreement. SoCalGas had been ordered in January 2016, as part of the SCAQMD abatement order, to devise a health study plan for the victims of its blowout. Instead of complying, the gas company kept stalling to the point that the AQMD had to file suit. This health study should have been started in 2016, but instead, the residents face an uncertain future of what the still unnamed chemicals that were emitted hold in terms of serious and possibly life-threatening diseases.
11. As far as the monitoring systems to be installed, if there are times that the monitors go offline, residents must be notified immediately as to the reason. In addition, the resulting data from the monitors must be reported to the AQMD, the LA County dept. of Public Health, and the Dept. of Conservation.
12. The special Aliso fund listed in the agreement must be used to clean all homes, parks, schools, businesses of contaminants within a ten-mile radius of the damaged well.

Respectfully submitted,

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