



November 14, 2016

Board of Education  
Los Angeles Unified School District  
333 South Beaudry Avenue, 24th Floor  
Los Angeles, CA

**Re: Comments on Resolution 040-16/17, November 15, 2016 Board Meeting: Decommissioning of Aliso Canyon Natural Gas Storage Facility**

LAUSD Board of Education Members:

Thank you for the opportunity to present comments on behalf of the Southern California Gas Company on Resolution-040-16/17: "Supporting the Closure of the Aliso Canyon Natural Gas Storage Facility."

**Operational Enhancements at Aliso Canyon Storage Facility**

Over the last year SoCalGas has made comprehensive infrastructure, technology, and safety enhancements at Aliso Canyon that strengthen the facility's infrastructure, improve monitoring for early detection, and promote clear communications with stakeholders.

Examples of infrastructure and technology enhancements include the installation of:

- New inner metal tubing of every well approved for injection – in total more than 40 miles of new steel piping;
- Around-the-clock pressure monitoring of all wells in a 24-hour operations center;
- An infrared fence-line methane detection system.

On November 1, 2016, SoCalGas requested authority from the California Division of Oil, Gas, and Geothermal Resources (DOGGR) to resume injection at Aliso Canyon to support the heating, cooking, and electricity needs of residents and businesses across Southern California. In support of this request, and under the direction of DOGGR and the California Public Utilities Commission (CPUC), SoCalGas completed a [comprehensive fitness for service analysis](#) of the Aliso Canyon storage facility, which included an assessment of the design, construction, operation and maintenance of the Aliso Canyon surface facilities, underground storage wells and reservoir.

DOGGR and the CPUC will be confirming that the conditions to resume injection operations at Aliso Canyon have been met and holding a public meeting.

## Health Data and Long Term Health Study

Thousands of air, soil, and dust samples were collected and tested by multiple regulatory and health agencies during and after the incident. Several agencies, including the Office of Environmental Health Hazard Assessment and the Los Angeles County Department of Health, reported that long term health effects were not expected and that chemicals like benzene detected in air samples were at or below levels seen elsewhere in the county and below levels of concern. In addition, none of the approximately 250 substances DPH tested for inside homes, including metals like barium, were detected at any level of health concern.

SoCalGas supports the prompt initiation and completion of a health study to evaluate the potential impacts of the natural gas leak. SoCalGas understood that the South Coast Air Quality Management District (AQMD) would conduct a study that was similar to an enhanced risk assessment, which many agencies, including AQMD, regularly rely on to assess potential risk to the community associated with the release of air contaminants. SoCalGas agreed to fund the reasonable costs of such a study under the Stipulated Abatement Order and committed to fund up to \$400,000 to complete the health study.

To date, AQMD has not provided SoCalGas with a description of a proposed health study to be performed pursuant to the Stipulated Abatement Order. What AQMD has discussed is a National Academy of Science's-led scoping effort that would continue to delay the start of this health study. SoCalGas continues to urge the AQMD to provide a proposal for and to quickly begin a health study consistent with the scope that was originally envisioned during the Abatement Order proceedings.

Finally, as indicated by the *"Aliso Canyon Winter Risk Technical Assessment"* report developed by the California Energy Commission, California Public Utilities Commission, California Independent System Operator and LA Department of Water & Power, **SoCalGas cannot meet peak gas demand this winter without Aliso. As a result, electric generators and businesses, such as refineries, hospitals, and airports, are at risk of curtailment.**

In summary, SoCalGas has complied with the requirements of SB 380, DOGGR Emergency Order 1109 and other emergency State directives and regulations, and the federal Interagency Task Force's forward-looking recommendation to operate wells with a dual barrier configuration. Closing the Aliso Canyon storage facility would be inconsistent with State law and agency determinations and would increase the risk of energy shortages in LA County.

We thank you for the opportunity to provide comments. Should you have any questions, please contact Frank Lopez, government affairs manager at (213) 703-1347 or [flopez5@semprautilities.com](mailto:flopez5@semprautilities.com).

Lisa Alexander

A handwritten signature in black ink that reads "Lisa Alexander" with a long horizontal flourish extending to the right.

Vice-President - SoCalGas