

January 29, 2016

*Sent via electronic mail to:*

[staff@oal.ca.gov](mailto:staff@oal.ca.gov)

[DOGGR\\_GasStorageRegs@conservation.ca.gov](mailto:DOGGR_GasStorageRegs@conservation.ca.gov)

OAL Reference Attorney  
300 Capitol Mall, Suite 1250  
Sacramento, California 95814

Department of Conservation  
801 K Street, MS 24-02  
Sacramento, California 95814  
Attn: Gas Storage Facility Regulations

Re: Comments on Notice of Proposed Emergency Rule Making Action  
**“Underground Gas Storage Facility Regulations”**

To whom it may concern:

Thank you for the opportunity to provide comments on the proposed emergency rulemaking action regarding “Underground Gas Storage Facility Regulations”. We are the Board Presidents of 10 homeowners associations in Porter Ranch, California, representing thousands of residents in the immediate vicinity of the leaking Aliso Canyon facility gas well that prompted this emergency regulation. Our families, along with thousands of other families in the community have had our lives upended for months due to this incident.

The future of our entire community is in jeopardy and it is our position that the time has come for the Aliso Canyon gas storage facility to be retired from service. The area around the facility has completely changed since the facility began operation more than 40 years ago with more than 30,000 people directly impacted by any gas leak from the facility. In addition, the facility’s infrastructure is more than 60 years old and has clearly reached its useful life.

However, we recognize that this decision is outside the purview of the Department of Conservation, which is only tasked with proposing modifications to the regulatory requirements governing the operation of all gas storage facilities. To that end, we submit these comments on the proposed emergency regulation to the benefits of the thousands of people who live in close proximity of gas storage facilities in California.

While the regulation is intended to improve the reliability of gas storage facilities, we believe that it is focused too much on monitoring of well integrity and not enough on ensuring the

ability to stop a leak after it occurs. The incident at Aliso Canyon has demonstrated the following facts:

- ◆ It is a **fact** that metal casings of gas wells could experience sufficient corrosion that result in the leakage of massive amounts of gas. This was clearly demonstrated by the catastrophic failure of Aliso Canyon well SS-25.
- ◆ It is a **fact** that monitoring of well casings is not a sufficient indicator of the satisfactory integrity of the casing. This was demonstrated by the fact that well SS25 casing was inspected for its integrity within 12 months prior to its failure.
- ◆ It is a **fact** that the gas facility operators (in our case, the Southern California Gas Company) had no validated measures in place to plug a leaking well casing. This was demonstrated by the inability of SoCal Gas company to plug the leaking well after multiple attempts of heavy liquid injections into the well.
- ◆ It is a **fact** that the professional community does not have the knowledge of how to immediately plug a leaking gas well. This was proven by the inability of national experts hired by SoCal Gas Company to plug the leaking well.

The above facts clearly demonstrate that monitoring the integrity of the well casing is not a sufficient mitigation measure, and that casings will eventually corrode sufficiently to cause a leak. This is especially true with old casings, which most of the wells in Aliso Canyon have. With this in mind, we strongly urge you to consider a more direct regulation that requires the following:

1. All gas wells must be equipped with bottom valves that can shut off the flow of the gas up through the production tube and the well casing. Bottom valves in this letter refer to mechanical valves located at the bottom of the well below the full depth of the well casing.
2. The operator must be required to conduct periodic testing (no less frequently than monthly) of the bottom valves to ensure the functionality of the valves in a simulated pressure-loss event in the casing.
3. Failure of the bottom valve to prevent the flow of gas in a simulated pressure-loss event shall trigger an immediate removal of the well from service until the valve is either repaired or replaced, and then tested for full functionality before the well is put back in service.
4. Existing gas wells that do not have bottom valves capable of stopping the gas flow under a simulated pressure-loss event must be immediately removed from service until they are

equipped with a functioning safety valve, and the valve is tested under a simulated pressure-loss event before the well is put back in service.

5. Finally, the public safety and health impacts of a gas leak, as well as its environmental impacts, should not allow grandfathering of older well design. Specifically, as design and operational standards for gas wells change (i.e., improve), the operators should be given a defined period of time (no more than 1 year) to bring all their wells to the new standards. Any well that cannot be modified –or is not modified– to the new standards within the 1-year period should be removed from service and sealed. The fact that a well conformed to the standards in place at the time it was constructed, which was 50 years ago for many of the wells in Aliso Canyon, is not an acceptable justification for the environmental and public safety calamity caused by the Aliso Canyon well leak.

We urge you to include our proposed requirements in the regulation because we believe that the incident at Aliso Canyon has clearly demonstrated that casing failure is inevitable, and therefore the emphasis should be on ensuring that a functioning mechanism is in place that can reliably stop the flow of gas into the casing when needed.

Respectfully Yours,

*Chad Cheung, Board President, Promenade at Porter Ranch Homeowners Association*

*Craig Forry, Board President, Porter Ranch Estates Homeowners Association*

*Marilyn Gutierrez, Board President, Tampa Terrace Estates Homeowners Association*

*Pete Heidenfelder, Board President, The Heights at Porter Ranch Homeowners Association*

*Emily Jensen, Board President, ALDEA Homeowners Association*

*Adrienne McCune, Board President, Park Northridge Homeowners Association*

*Issam Najm, Board President, Northridge Park Homeowners Association*

*Nena Pua, Board President, Northridge View Estates Homeowners Association*

*Elliot Schneider, Board President, ViewRidge Townhomes Homeowners Association*

*Dane Stone, Board President, Highlands at Porter Ranch Homeowners Association*

cc: Assemblyman Mike Gatto  
Senator Fran Pavley  
Los Angeles County Supervisor Michael Antonovich  
Los Angeles City Councilman Mitchell Englander