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Methane Gas is piped in from Oklahoma, Colorado and Texas and is stored in a field beneath the entire Ballona Wetlands Ecological Reserve and all of Marina del Rey, parts of Venice, Playa del Rey and Del Rey. Customers for this storage field include Chevron, LADWP, Edison, the Torrance Refinery and NRG. The [Ballona Wetlands Ecological Reserve] project area is in Los Angeles County within the Playa Del Rey oil field boundary. [DOGGR] Division records indicate that there are at least 27 oil and gas storage wells and several production and gas lines located within the project boundary as identified in the application. *Excerpt from Project Description, Draft EIS/EIR*

The existing SoCalGas natural gas monitoring wells would be decommissioned (i.e., capped and abandoned in place in accordance with applicable law) within the Ballona Reserve and related pipelines would be abandoned or modified to accommodate the proposed restoration activities. Page 2-43, Draft EIS/EIR

The project site includes the Ballona Reserve and seven potential natural gas storage well relocation sites. *Page 1-20, Draft EIS/EIR*

In the summary of required permits and approvals, "permit to abandon and drill replacement wells will be needed." *Page 1-25, Draft ElS/EIR.*

Gas pipeline relocation is included in the infrastructure and utility modifications summary. *Page 2-15 Draft EIS/EIR*. Between 2,290,000 and 2,420,000 cy of dredged or fill material [soil] would be repositioned on the project site. *Page ES-10 Draft EIS/EIR*

California Council on Science and Technology (CCST Report), "Long-Term Viability of Underground Natural Gas Storage in California: An Independent Review of Scientific and Technical Information." Report commissioned per Senate Bill 826 (Leno, 2016):

"Playa del Rey [Gas Storage Facility] stands out as a facility with risk-related characteristics of high concern for health and safety relative to the other facilities in California..." **Page 184, CCST Report**

"Playa del Rey is close to a densely populated area, and the risk of loss-of-containment at Playa del Rey is higher than most other natural gas storage facilities. Our report questions, but does not answer, the impact of closing this site. The State should commission a cost-benefit analysis including full consideration of risks associated with loss-of-containment from this facility." **CCST Report**

The number of open wells connected to storage reservoir [at Playa del Rey gas storage field] in 2015 are documented to be 54. *Excerpt from Powerpoint presentation, California Council on Science and Technology (CCST Report), "Long-Term Viability of Underground Natural Gas Storage in California: An Independent Review of Scientific and Technical Information."*



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California Coastal Commission comments on Draft EIS/EIR:

On page 3.8-8, the EIR states that "Routine surface monitoring of SCG wells found storage gases were reaching the surface through casing leaks and along the well casings in three wells. Biogenic gas was detected in four abandoned wells in the PDR field area, resulting in re-abandonment of these wells to eliminate leaks."

- Where are the three leaking wells located? When was the "routine surface monitoring" conducted?
- Where are the four re-abandoned wells located? Has there been subsequent monitoring to determine if the re-abandonment was successful in eliminating the pathway for biogenic (or storage) gas to reach the surface?

California Coastal Commission comments on Draft EIS/EIR (cont'd.):

- Has SoCalGas (or any other entity) conducted a comprehensive analysis of the age and status of each well casing (in use or abandoned) and the potential for future leaks of storage or biogenic gas?
- Once the wetland is restored, it will become harder and result in more impacts to address poorly abandoned or leaking wells. We recommend a thorough analysis of all existing and abandoned wells in the project footprint to determine what work, if any, needs to be done in advance of the restoration to ensure that restored habitats are maintained and disturbance of these habitats in the future is minimized.

Climate Reality Project Los Angeles:

At a September 29, 2018 forum titled Bulldozing Ballona Wetlands: Contributing to Climate Change, Andrew Ellis, Climate Reality Project Los Angeles Chapter then-president and soil scientist was asked whether or not it was better to convert grasslands and coastal scrub to saltmarsh because of the strong values of carbon sequestration. He explained that the current amount of plants and marsh soils at Ballona provide significant carbon sequestration – carbon that would be released into the atmosphere with a significant bulldozing project. He added, "Do you want to wait for 100 years to semi-replicate a saltmarsh that nature might have made? We don't have 100 years!"

Andrea León-Grossman, then Southern California Organizer, Food & Water Watch, said "Our goal is to move to 100% renewable energy to protect local families and the environment. If we are serious about the planet's future and limiting the impacts of climate change, we will spend resources shutting down the storage field – which benefits the health and safety of the residents, visitors and the animals that live there." **News Release in Response to Draft EIS/EIR**

