

Julie Nygard

-----Original Message-----

From: joe [mailto:joe@lodiirrigation.com]
Sent: Wednesday, November 10, 1999 10:29 PM
To: Judith Ikle
Subject: COMMENTS ON THE DRAFT EIR

Judith,

Will applicants be limited to the amount of water they can use for its operations. In the unlikely event of high demand in the future, will they be restricted so they will not negatively affect the local water table by over drafting it.

I31-1

Lodi Gas Storage has committed to producing less than 75 tons of pollution annually, will this be addressed in the final draft and will it be monitored?

I31-2

In the event that a land owner wants wells placed in a particular location to reduce the impact to his property and/or farming operations, is it possible for the applicant to drill the wells horizontally?

I31-3

What is the minimum size that a well site can be?

I31-4

Would one re-injection well be sufficient for water re-injection?

I31-5

Is one re-injection well satisfactory?

What safeguards are in place to protect the people. How will complaints be handled? Who do people contact if LGS is not a "good neighbor"? It is up to you whether or not they are in our backyard, how will you protect the people if they do not have the money or time to defend themselves.

I31-6

Regards,

Joe Petersen

Responses to Comments from Joe Peterson (November 11, 1999)

- I31-1. California water law allows beneficial use of groundwater on overlying land. The project will only use a small amount of water for domestic purposes (i.e. drinking, washing, and toilet flushing). The majority of water will be used for landscape irrigation, which would have a similar demand as that of the existing agricultural land uses.
- I31-2. The comment concerns the operational emissions of the project and the potential monitoring of emission levels. Operational emissions of the project are presented in Table 3.5-4, "Natural Gas Fired Equipment - BACT Emissions Case". This table reflects the Applicant's proposed best available control technologies (BACT) to minimize emissions. Before obtaining an Authority to Construct Permit and a Permit to Operate, the Applicant must obtain the agreement of the San Joaquin Air District as to what technologies constitute BACT. If controlled emissions (after installation of BACT) exceed specific trigger levels, then emission- offset credits must be obtained for the project. The San Joaquin Air District may require monitoring as a condition of the permits.
- I31-3. The specific location of the well can be negotiated within reason (i.e. +/- a few hundred feet) to achieve the project's objectives. The number of wells and their spacing is dependent on the porosity of the underlying geologic deposit. Although it is technically possible to directionally drill, it is much more complicated and would be subject to a much greater chance well collapse or blowout. Vertical drilling is preferable.
- I31-4. The well drilling site, as described on page 2-18 of the draft EIR, would be approximately 200 feet by 150 feet. The minimum well drilling site is determined not only by the size of the drilling rig, but the need to store the well casing material adjacent to the drill rig, the size of the equipment needed to move well casing material, and the need for onsite facilities to provide 24-hour a day operation.
- I31-5. One water re-injection well would have the capacity necessary to handle all produced water; however, there are two formations that gas and water will be withdrawn from. Permitting requirement specify that produced water must be re-injected into the formation where it was withdrawn; therefore two wells must be drilled.
- I31-6. The CPUC Energy Division will be responsible for monitoring compliance with mitigation measures and project description features during project construction. Notification packets required to be distributed during construction (see Mitigation Measure 3.10.1) will include the name and telephone number of CPUC representatives who can be contacted to request information, answer questions, and register complaints. The CPUC will also retain some jurisdiction during project operations, along with other state and federal agencies.

Letter I32

-----Original Message-----

From: Ernie Ralston [<mailto:eralston@matrixep.com>]

Sent: Tuesday, October 19, 1999 3:50 PM

To: Judith Ikle

Subject: Lodi DEIR

Judith: On page 2-8 of the DEIR, it states that LGS examined the alternative of electric driven compressors, and provides four bullets describing why electric drivers were not considered feasible. In checking LGS' PEA, I could find no discussion of the electric driver alternative to substantiate these four bullets...was this information submitted in subsequent filings?

I32-1

If so, I would be interested in receiving that information.

Thanks,

Ernie Ralston

Responses to Comments from Ernie Ralston

I32-1. The comment concerns the evaluation of the use of electric compressors. This issue is addressed in Chapter 2, “Clarification of Major Issues”, of this final EIR. The CPUC has sent a copy of the requested information to the commenter.



California Public Utilities Commission

October 13, 1999
Lodi

Comments on the Draft EIR

NAME Halbane Ramirez
ADDRESS 2401 W. Turner Rd. #250
PMB 230
Lodi, CA 95242

TELEPHONE (OPTIONAL): _____

Comments are due by November 10, 1999, and may be submitted tonight or mailed to:
CA Public Utilities Commission
c/o Public Affairs Management
101 The Embarcadero, Suite 210
San Francisco, CA 94105
Fax 415-291-8943
Email: cpuc-gas-iodi@pamsf.com

COMMENT: I have a concern about putting the gas pipe line in our neighborhood. As I see it there are other places that this project can be done at, without putting more pollution in an already polluted area. Buying rights to continue with the project does not make it acceptable, as far as making it alright to put more toxins in an already polluted area.

My daughter has breathing health problems and so do I, she was sick from Oct thru March last year & part of this year. More pollution just makes people with health problems sicker - would you like the doctor bills? More pollution is not the answer and this pipeline is going to give off great amounts of toxins - lets face it. There are other places to put this pipeline so that it is not near a populated area, such as Lodi.

Thank you for reading my note and taking the health of the people into consideration.

QUESTIONS?

CONTACT THE INFORMATION LINE AT 415/989-1446, EXTENSION 85

CHECK OUT THE PROJECT WEBSITE WWW.CPUC.CA.GOV/DMSIONS/ENERGY/ENVIRONMENTAL/INFO/LODI-GAS.HTM



I33-1



Responses to Comments from LaVonne Ramirez

I33-1. This comment concerns the potential for the project to result in the emission of toxic air pollutants, specifically formaldehyde. As part of the air quality analysis for this project, a worst-case screening level health risk assessment was conducted based on methodology recommended by the California Air Pollution Control Officers Association. This analysis is presented on pages 3.5-14 through 3.5-15 of the draft EIR. The analysis found that the greatest health risk would result from the exposure to formaldehyde emissions and would equal a cancer risk of 3.4 per million people, which is less than the San Joaquin Air District threshold of 10 per million people. Therefore, based on the extremely conservative modeling conducted for the air quality analysis, the health effects of the project from toxic air contaminants are less than significant.

In addition, the draft EIR contains several mitigation measures designed to reduce health risks from dust and construction-related emissions; these are described on pages 3.5-10 through 3.4-16 of the draft EIR and revised slightly in Chapter 3 of this final EIR.

Letter I34

October 17, 1999

Judith Ikle', Project Manager
c/o Public Affairs Management
101 The Embarcadero, Suite 210
San Francisco, California 94105

Dear Ms. Ikle',

I am writing to express my concern regarding the Lodi Gas Storage Project. I understand that the draft EIR allows placement of the gas compressor facility on airport property. As the former Executive Director of the Miss California, Miss America Pageant, I have spent many years dedicated to developing young people with high ideals, healthy lifestyles, and moral obligations to their communities. I have witnessed the seriousness with which morally obligated young people are undertaking the responsibility to make this planet a better place to live. Therefore, I am saddened to see such irresponsible decisions being made, in general, but especially with regards to this project. Projects that impact the land, air and water, as well as the general safety of the public need very close scrutiny. Having read about utilities related accidents this summer, recalling the fire and explosion at McDonald Island, I find it irrational to place a gas refinery near an airport, *within one quarter of a mile of homes*, a new subdivision and a heavily travelled freeway. As you recall, the McDonald Island facility fire and explosion hurled very heavy debris over a quarter of a mile. Will my daughter and her husband, who commute this freeway daily be safe? And why isn't the McDonald Island explosion referenced in the safety section of the draft EIR? Please address it in detail in the final EIR.

I34-1

I34-2

As an older person, I feel that people who have not reached my age, simply do not understand that their decisions can adversely affect the future of our children and *grandchildren, and theirs*. Please consider this wisdom in your review of the project. Please make sure that there is such a great need for this project that public endangerment is warranted.

Sincerely,


Charlotte Randolph

Responses to Comments from Charlotte Randolph

- I34-1. At this time no decision has been made regarding the proposed project except that an environmental impact report, prepared in accordance with CEQA, is required as part of the CPUC's decision making process. Numerous federal, state, and local agencies closely regulate the natural gas industry to ensure public and environmental health and safety.
- I34-2. Although problems or accidents at PG&E facilities may cause concern, they are not related to the operation of the proposed project. The project, if approved, will be built to the latest safety standards to minimize potential accidents. In addition, various safety programs have been incorporated into the project description to protect the health and safety of people and the environment (see section 2.4.13 of the draft EIR). Each of these programs will be approved and enforced by the federal, state, or local agency with jurisdiction over the relevant issues. Although no project can be designed to guarantee accident-free operations, the safety programs required for the project are sufficient to ensure a high degree of safety.

No changes are required to the safety analysis in the draft EIR.

Letter I35

October 17, 1999

Judith Ikle', Project Manager
c/o Public Affairs Management
101 The Embarcadero, Suite 210
San Francisco, California 94105

Dear Ms. Ikle,

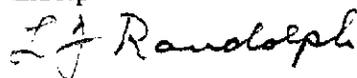
Please find the following my reasons for strong opposition to the Lodi Gas Storage Project. In review of the draft EIR on this project, I am astonished to find that the preferred site to place the compressor facility is a the Lodi airport. I am a pilot of 55 years, having flown in and out of the Lind's (Lodi) airport since 1946. To consider placing as gas refinery on airport property, which is a widely used public access airport is unbelievable.

- * This is an uncontrolled airport, meaning there is no tower to control traffic, which already increases risk with the degree of traffic this airport enjoys. I35-1
- * Pilots flying in from other areas, not familiar with the airport, will assume that the airport utilizes the most conventional approach pattern, which is a left hand pattern. This would place pilots directly over the proposed compressor facility when using the diagonal runway. This hinders the pilot's line of flight. I35-1
- * Venting from the facility would produce some form of plume of gas. Would this further endanger the incoming pilot by hampering visual approach. There is no radio communication at this airport. I35-2
- * Our local community hospital uses this airport to transport emergency patients to other hospitals. I35-3
- * There is enormous recreational use of this airport, with the largest parachute center on the West Coast located there. The jumpers use the entire field for their landings. Should this center continue to operate, how many additional accidents will occur as result of this plant. I35-4
- * In addition to the above concerns, it is one of the primary fields in the area for ultra-lights, which are aircraft owned and operated by pilots who do not have pilot's licenses, also without radio communication. They utilize the entire field and often fly at 100 feet or less. I35-5
- * Finally, it is my understanding that the most practical and efficient location for a compressor facility on a project like this is at the reservoir, next to the separator facility. I35-6

Thank you for your consideration of my concerns.

Sincerely,

L.J. Randolph



Responses to Comments from L.J. Randolph

- I35-1. The alternate compressor facility would not be located within the approach zones of the airport. Since publication of the draft EIR, the Applicant has received a determination from the Federal Aviation Administration that the alternate compressor site would not interfere with general aviation activities.
- I35-2. Venting of gas is not a regular activity at the proposed facility. Natural gas is colorless, although releases may cause shimmer.
- I35-3. The proposed facility would not affect the ability of the “lifeflight” helicopter or fixed-wing aircraft from using the Lind Airport.
- I35-4. Based on observations at the parachute center it appears that the parafoil style parachutes used by most parachutists are highly maneuverable and can be controlled to avoid the proposed project facilities. When observed during preparation of the draft EIR, most parachutists landed within a 100 feet of the parachute center, which is a multi-story building.
- I35-5. The compressor facility would be approximately 35 feet tall and would be screened by trees; therefore it is likely that an ultralight pilot would be able to see the facility from some distance and would be able to safely avoid it.
- I35-6. The most efficient location for the compressor facility is near the injection wells; however, it is not necessarily the most practical. The project Applicant proposed alternate locations near Highway 99 and the airport to address the noise from the facility and other land use conflicts.