



A  Semptra Energy utility

Jimmie I. Cho
Chief Operating Officer
555 West 5th Street
ML: GT21C1
Los Angeles, CA 90013

BY EMAIL AND U.S. MAIL

March 21, 2019

Angelo J. Bellomo
Deputy Director for Health Protection
County of Los Angeles Department of Public Health
5050 Commerce Drive
Baldwin Park, CA 91706

Re: *County of Los Angeles Department of Public Health Letter Regarding Crude Oil*

Dear Deputy Director Bellomo:

I am responding to your letter dated March 11, 2019, in which you suggest that SoCalGas failed to timely disclose certain treatment systems and other activities at the Aliso Canyon facility related to the extraction of residual oil from the natural gas stored at the facility. You state that the Los Angeles Department of Public Health (DPH) was unaware of these activities, and that it therefore lacked information relating to the composition of the gas that leaked from the well SS-25. With respect, we disagree with your statements and strenuously dispute any allegation that we have, at any time, withheld relevant information regarding the composition of the gas from DPH, any other agency, or the public.

Turning to the issues raised in your letter, I provide the following information, which I am confident should resolve any concerns you may have:

First, the fact that the storage wells at Aliso Canyon produce some residual oil in the course of normal storage operations is public knowledge. SoCalGas reports all such production data to the Division of Oil, Gas and Geothermal Resources (DOGGR), which then publishes that information on its "Well Search" website.¹ Monthly oil production volumes for SS-25 specifically are available on DOGGR's website as far back as 1977. The facilities associated with the production and extraction process are properly permitted and inspected according to state and local regulations. "Crude oil" is also prominently listed (with volumes disclosed) several times for multiple facility locations in Aliso Canyon's Hazardous Materials Business Plan filed every year with state and local authorities.

¹ <https://secure.conservation.ca.gov/WellSearch/>

Second, as your letter admits, DPH has always been aware that the Aliso Canyon storage reservoir is a depleted oil-bearing zone. Since at least early 2016, SoCalGas has understood that DPH was evaluating potential health impacts associated with compounds found in both natural gas and crude oil, and we have thus never been aware of any misunderstanding on the part of DPH requiring correction. For example, DPH wrote in its May 13, 2016 Public Health Assessment:

- “Given the history of the Aliso Canyon Storage Facility as a petroleum oil extraction field, DPH determined that it was necessary to test for more than those chemicals that might have been emitted from Well SS-25 as a result of the gas leak and related operations.” (p. 1)
- “The reemergence of adverse health symptoms reported by the community and preliminary results of this independent research prompted the Los Angeles County Department of Public Health (DPH) to conduct a series of rapid surveys and testing to investigate the scope of the health effects and possible exposure to contaminants related to gas *and oil field* activities.” (p. 1, emphasis added)
- “DPH conducted an indoor assessment of contaminants related to natural gas *and oil* emissions, and a comprehensive investigation of reported symptoms since the gas leak was sealed.” (p. 5, emphasis added)

Consistent with those statements, air samples taken by DPH and other agencies during and immediately after the incident were analyzed for compounds that are typically found in crude oil, including benzene, toluene, ethylbenzene and xylene. SoCalGas also conducted its own community air testing for these compounds and posted the results of that testing on its website during and after the leak. As DPH is aware, those compounds were never detected in Porter Ranch at concentrations above regulatory levels of concern. Other regulatory agencies, including the South Coast Air Quality Management District (SCAQMD) and the Office of Environmental Health Hazard Assessment (OEHHA), reached similar conclusions.²

Third, SoCalGas informed the press, while the leak was ongoing, that oil “naturally occurring within the leaking well's reservoir” may have been released and that SoCalGas had implemented measures designed to capture such releases.³ After oil spots were discovered in various locations following that release, and samples of the residue were analyzed, DPH reported in its January 19, 2016 “Update on the Aliso Canyon Storage Facility Gas Leak, Chemical Exposures, and Health Impacts in the Porter Ranch Community” that “[t]he sample results indicate the presence of

² See, e.g., <http://www.aqmd.gov/docs/default-source/compliance/aliso-cyn/report/executive-summary.pdf?sfvrsn=4> (“Long-term concentrations of air toxics were found to be substantially lower than the health-based reference exposure levels (REL) for long-term exposures”) and <https://oehha.ca.gov/air/general-info/aliso-canyon-underground-storage-field-los-angeles-county> (“Overall, the available air sample data does not indicate that an acute health hazard exists from any of the volatile organic chemicals measured, including benzene, in the Porter Ranch neighborhood as a result of the Aliso Canyon natural gas leak. . . . Current measured exposures to benzene are below the level of concern for chronic health effects.”)

³ See, e.g., <https://www.latimes.com/local/california/la-me-porter-ranch-20160105-story.html>.

heavier-end petroleum hydrocarbons consistent with crude oil (carbon chains 21 through 28).”⁴ Moreover, the fact that the leak caused small amounts of oil to reach the surface was apparent to anyone who visited the well during the incident. Representatives from DOGGR, the California Public Utilities Commission (CPUC), California Occupational Safety and Health Administration (OSHA), and the Los Angeles County Fire Department were onsite nearly every day during the leak and would have observed the presence of oil on the well pad. In fact, OSHA and the County Fire Department took samples of the oil during the incident. It is my understanding that representatives from DPH were likewise onsite frequently during the incident, but even if they did not see the oil themselves, we understand that DPH coordinated closely with those same agencies in responding to the incident and evaluating its potential public health impacts.

Fourth, your letter appears to take exception to a statement by SoCalGas that “the contents of the release were limited only to typical components of stored natural gas.” We are not familiar with the specific statement to which you are referring, but in any event, that statement is neither false nor misleading. As noted above, DPH is and has always been aware that Aliso Canyon, like many other natural gas storage facilities across the United States, is a depleted oil field. We have no reason to believe that gas stored at Aliso Canyon is in any way atypical of gas stored at similar facilities. In any event, SoCalGas’ air monitoring during and after the leak specifically tested for components that could be present in the small amounts of crude oil that may be combined with the stored natural gas.

Fifth, we understand that you were copied on an October 30, 2018 letter that Porter Ranch Neighborhood Council (PRNC) President Issam Najm sent to the CPUC addressing this precise issue. From at least that time, DPH has engaged in discussions with SoCalGas and several other Government Plaintiffs concerning matters related to the SS-25 gas leak. Despite any number of opportunities to raise this or any other concern, DPH has, until now, remained silent in the nearly five months since receiving Mr. Najm’s letter.⁵

For all of the above reasons, your suggestion that SoCalGas somehow withheld information or was otherwise not fully transparent with respect to the components of natural gas released during the incident, and your statements concerning DPH’s ability to perform a health assessment, are simply incorrect. From the time the leak began until the present, SoCalGas has made every effort to provide accurate and timely information to the public and to the appropriate regulatory agencies. To that end, among many other actions, SoCalGas provided written responses to hundreds, if not thousands, of formal and informal information requests from local, state and federal agencies, legislators, and the independent root cause investigator; produced hundreds of thousands of documents to those same entities; and maintained a public website during the incident to provide immediate public access to air monitoring data. This was in addition to the

⁴ See http://publichealth.lacounty.gov/eh/docs/AlisoCanyonUpdate_1-20-2016.pdf. BTEX was not detected in any of the residue samples and DPH determined at the time that the spots posed a “minimal health risk.” SoCalGas nevertheless provided cost-free indoor and outdoor assessments and cleaned hundreds of homes, cars and public parks in response to concerns expressed by the community.

⁵ Moreover, PRNC has been well aware of this issue since at least November 2016. See, e.g., <http://www.prnc.org/sites/default/files/pages/2016/2016-1110-PRNC-Position-Aliso-Canyon-Gas-Storage-Facility.pdf> (“There are also unknown chemicals left in the underground formation from the time it was filled with oil. How can we know the health impacts of the chemical exposure, when we do not know to what chemicals we were exposed?”).

voluminous information about all major aspects of the facility dating back decades that was and remains available on a variety of public agency websites, including those maintained by DOGGR, CARB and SCAQMD. SoCalGas has cooperated extensively with all leak-related investigations, and we will continue to do so.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jimmie Cho', with a long horizontal flourish extending to the right.

Jimmie Cho
Chief Operating Officer

cc: Edward Randolph, Energy Division Director, California Public Utilities Commission
Wayne Nastro, Executive Director, South Coast Air Quality Management District