

CALIFORNIA COASTAL COMMISSION

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F8a

9-23-0818 (SoCalGas)

April 11, 2025

CORRESPONDENCE

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Subject: Coastal Commission April Meeting, April 11, 2025 Item 8 SoCalGas/ PDR Request to Abandon Wells 14,19
Date: Sunday, March 23, 2025 10:45:19 AM
Attachments: [Screenshot 2023-04-04 at 12.10.11 PM.png](#)



Commissioners and Staff,

Re: April Meeting, Agenda Item 8: SoCalGas request for approval to Abandon Playa del Rey oil/gas operational wells Del Rey 14, 19. Application 9-23-0818

Grassroots Coalition requests Coastal Commission Staff secure meaningful response from SoCalGas and Cal Gem regarding the intent and need for abandonment of these wells and to determine if there is a need for safety concerns or business/financial benefits to SoCalGas that gives rise to drilling replacement wells for these wells and/or any other wells abandoned by SoCalGas within the past 4 years (including but not limited to Del Rey 4).

This is of great concern, since drilling new wells for underground gas storage operations is not covered under SB 1137 -the 3,200 foot buffer zone which disallows drilling new wells next to sensitive receptors and will also provide for ground/surface water and air monitoring to protect both the environment and the public.

While the California Department of Fish and Wildlife's FEIR for Ballona's restoration has failed in court and a new EIR must be created, it appears that SCG is continuing to use the defunct FEIR as specious reasoning to abandon wells in order to --- sometime in the future--start to request replacement wells be drilled per the locations cited in the FEIR--all of which are greatly within the 3200' buffer zone and are directly adjacent to sensitive receptors, the homes surrounding Ballona Wetlands.

BACKGROUND for this Request-

Please Watch the award winning video below.

Much of the commentary is from EarthWorks' Sharon Wilson as she displays her work with a Flir camera that visualizes the VOC outgassing from oil/gas operations.

<https://earthworks.org/uncovering-the-permian-climate-bomb/>

Below is language from the recent SoCalGas/Playa del Rey language from the "unplanned release" of the oilfield gases to the atmosphere in our neighborhoods. This type of uncontrolled venting is discussed by Sharon in the video as she shows you what it looks like and how it is harming the atmosphere and us.

"On Tuesday, March 4th, the operation of a valve resulted in an unplanned release of natural gas at the facility at approximately 2:40 PM. Technicians responded quickly, securing equipment and stopping the release in approximately 7 minutes.

The estimated volume of natural gas released was approximately 180,000 cubic feet – equivalent of about 400 bar-b-que propane tanks. " Mike Harriel SoCalGas/ Playa del Rey

In a recent meeting with California Coastal Commission Staff, regarding SoCalGas/ Playa Del Rey's dangerous reservoir gas leakage into the surface & subsurface of Ballona Wetlands, from wells Del Rey 4 and 9, we learned from staff that they haven't a basic understanding of the oil and gas operations of SoCalGas/ Playa del Rey. While we, as members of the public, can understand that the complexities of these oil and gas operations are not easy to understand and that the Coastal Commission Staff acknowledge their reliance upon Cal Gem, our oil/gas agency--for protective oversight of what to approve or not approve-- we believe it incumbent upon staff and CCC Commissioners to understand the basics and to generate answers on behalf of the public.

The California Coastal Act is a great tool for use in protecting the public and the environment from harm due to SoCalGas/ Playa del Rey oil and gas operations. To that end, we continue to seek the support of staff and the commissioners to ask key questions and to ensure meaningful response from Cal Gem and SoCalGas/ Playa del Rey.

Such critical support is necessary as Cal Gem continues to be nonresponsive to basic questions that pertain to SoCalGas/ Playa del Rey oil and gas operations as well as nonresponsive to ongoing VOC emissions that are outgassing day and night over coastal property that is directly under the Coastal Commission's permit 5-91-463.

Namely, the ongoing VOC emissions over Playa Vista's abandoned well, University City Syndicate in the Freshwater Marsh System to which the **Coastal Commission's 5-91-463 permit provides direct oversight.**

Below is EarthWork's assistance to Grassroots Coalition in our combined efforts to visualize the continual VOC outgassing over the abandoned well, University City Syndicate. Sharon Wilson has worked with us to visualize the outgassing and the imagery below was taken by EarthWork's Flir camera operator Kyle Ferrar.

Here is the wetlands: <https://youtu.be/QDXIPAYaCHA>

This is recent - 2019, FLIR imaging showing the oilfield gas off

gassing over University City Syndicate.
- EarthWorks & GC

Outgassing directly over a well head, in particular is indicative of a well acting as a conduit for gas migration. As cited by the City of LA's former gas consultant for the Playa Vista/ Ballona Wetlands region, Exploration Technologies Inc. (ETI)- June 16, 2000 Letter to Mr. Hsu, Chief, Grading Division pertaining to wells acting as conduits for gas migration and his belief of Cal Gem's need to take a different view on behalf of the public and the state of California's interests not being served when such gas migration is ignored.

"The purpose of well casings is to contain all fluids and gases, preventing cross-migration between different sands and protecting the freshwater aquifers." ETI

<http://www.youtube.com/watch?v=LR1r9X2VGZo&feature=geosearch> DOGGR Personnel finding gas over well.

2019 Oilfield outgassing over Playa Vista's abandoned oil well- University City Syndicate in freshwater marsh (public trust land/water) <https://www.flickr.com/gp/stonebird/2h5k6L>

And lastly the most recent comments regarding the oilfield gas leakage to the surface:

<https://saveballona.org/oil-well-gas-leak-creates-new-dangers-local-residents-and-visitors-ballona-wetlands.html>

How Hazardous is Too Hazardous? Grassroots Coalition requests help from the Coastal Commission to garner meaningful response from Cal Gem regarding SoCalGas/ Playa del Rey oil/gas operations.

And, we seek that Staff garner the answers to the following issues PRIOR to any approval from the Coastal Commissioners in April for any further well abandonments by SoCalGas/ PDR:

Grassroots Coalition requests Coastal Commission Staff secure meaningful response from SoCalGas and Cal Gem regarding the intent and need for abandonment of these wells and to determine if there is a need for safety concerns or business/financial benefits to SoCalGas that gives rise to drilling replacement wells for these wells and/or any other wells abandoned by SoCalGas within the past 4 years (including but not limited to Del Rey 4).

And, per SB 3711, it does cover University City Syndicate in the freshwater

marsh (CCC permit 5-91-463) as it is not a SoCalGas well and IS IN A SENSITIVE RECEPTOR area parkland and within 3200 feet of homes of Playa Vista. The Playa Vista site is updip of all the gas migration, meaning it all moves eastbound into the Playa Vista site and has many corridors of further migration as seen in the image provided in the link.

<https://saveballona.org/oil-well-gas-leak-creates-new-dangers-local-residents-and-visitors-ballona-wetlands.html>

Thank you,
Patricia McPherson, Grassroots Coalition

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Cc: jeanette.vosburg
Subject: Ca. Coastal Commission April 11,2025 AGAINST APPROVAL Item 8, Ballona Wetlands, SoCalGas Application to Abandon DR 14, 19
Date: Monday, March 31, 2025 12:03:49 PM
Attachments: [Screenshot 2025-03-28 at 8.17.37 AM.png](#)
[Screenshot 2025-03-28 at 9.05.08 AM.png](#)
[Screenshot 2025-03-28 at 8.59.20 AM.png](#)
[Screenshot 2025-03-27 at 5.07.31 PM.png](#)
[Screenshot 2025-03-28 at 8.17.37 AM.png](#)
[Screenshot 2025-03-28 at 9.05.08 AM.png](#)
[Screenshot 2025-03-28 at 8.59.20 AM.png](#)
[Screenshot 2025-03-27 at 5.07.31 PM.png](#)
[Screenshot 2023-04-04 at 12.10.11 PM.png](#)
[Doc6.pdf](#)



*(Grassroots Coalition's Public Record Act (PRA) requests to Cal Gem for communications with Coastal Commission Staff re: Commission approvals for abandonment & fixes to SCG/PDR Del Rey 4, Del Rey 9, yielded no outreach questioning from Commission Staff. Cal Gem has thus far not provided response to numerous PRA queries, including requests for daily logs of Del Rey 4, 9 in an attempt to determine volumes of reservoir gas leakage, corrosion problems in 'flats', etc. Hence, Grassroots Coalition met with Commission Staff to request help for eliciting response from Cal Gem. Thus far, Cal Gem has been nonresponsive to queries.
A new PRA is placed to Cal Gem re: Commission communications with Cal Gem re: Del Rey 14, Del Rey 19 abandonment approval recommendation by Commission Staff, April/2025.)*

COASTAL COMMISSIONERS AND STAFF,

<https://www.coastal.ca.gov/coastalvoices/IntroductionToCoastalAct.pdf>

Grassroots Coalition requests that no approval be granted by Commissioners for Abandonment of Del Rey 14 and Del Rey 19 at this time due to the following:

The Staff Report specifically cites that its recommendation does not determine if the underlying uses are in conformance with the Coastal Act. Unless the Commission knows the underlying use is in conformance with the Act, it is impossible to make a decision that is consistent with the Act. It would be akin to lighting a match in a dark room that may be full of dynamite and people.

This is especially true for the SoCalGas/Playa del Rey oil/gas ultrahazardous underground gas storage operations. The operations are distinctly unique as it is the only underground gas storage operation within an oilfield whose operations are directly under homes and neighborhoods. And, is an operation whose active injection/ withdrawal wells AND abandoned wells have given consistent rise to leakage of oilfield and reservoir gas leakage into the surface and subsurface.

Cal Gem provides no exigency / safety reasons for abandonment at this time and similarly, the Commission has no exigency/ safety reasoning as cause for approval to abandon Del Rey 14, or Del Rey 19 --critical monitoring wells, at this point in time.

Conversely, there is time for the Commission to correct errors in the Staff Report, garner information, answer legitimate concerns and share with the public a meaningful understanding of the potential negative impacts of abandonment of functioning monitoring wells upon the safety of the underground environmental integrity and the overlying ESHA habitats, and neighborhoods directly overlying and adjacent to the current operations of SCG within the Playa del Rey oilfield.

[SoCalGas, Playa Del Rey Gas Storage Field Leakage - Grassroots Coalition's CPUC Complaint Case: CPUC Consumer Protection and Safety Division - "Facts and Findings" | Grassroots Coalition](#)

Commission approval at this time threatens setting precedent for supporting willful blindness, the failure to gather relevant information necessary for informed decision making.

"SUMMARY OF STAFF RECOMMENDATIONS" - ARE THESE WORD GAMES?

"Based on information provided to Commission Staff from the California Department of Conservation Geology Energy Management Division, establishment of a new observation well in the Playa del Rey gas storage facility is not required if Del Rey 14 and Del Rey 19 are abandoned, nor is a replacement well proposed as part of this permit application." (Emphasis added.)

1. ...'as part of THIS permit application',... **BECAUSE 1.3 Project Setting and Review Area states: "Two of the wells, DR-17 and DR -19, would be redrilled from SoCalGas' property, outside of the Reserve."**

WHAT IS THE TRUTH?

The attached link to a SoCalGas info -video additionally cites to 16, not just 4 well abandonments as discussed in the Staff Report. The video also refers to reasoning for doing so, namely, **on behalf of the California Department of Fish and Wildlife's Plan for Ballona Wetlands restoration. However, CDFW's PLAN has been extinguished by all the parties this Staff Recommendation cites as still being a part.**

[Well Abandonments in the Ballona Wetlands Ecological Reserve | SoCalGas.](#) (Watch the You Tube)

1.3 Project Setting and Review Area

Southern California Gas Company (SoCalGas) proposes to perform a complete plug and abandonment of four (4) natural gas monitoring wells within the Ballona Wetlands Ecological Reserve (Reserve): Del Rey (DR) DR-14, DR-17, DR-19, and Vidor (V) V-15. The process would include bringing a workover rig onsite to remove the downhole piping and rod pump and setting cement plugs to isolate the production zone. At each well, the wellheads would be removed, and the well casings cut and capped approximately five feet below grade. All concrete cellar material, equipment, and exposed piping would be removed. Two of the wells, DR-17 and DR-19, would be redrilled from SoCalGas' property, outside of the Reserve.

What Is The Reason For the Abandonments?

According to the SoCalGas info-You Tube it is because:

"In support of a plan for a multi-year, Ballona Wetlands Restoration Project, SoCalGas plan to permanently seal 16 wells that lie within the boundaries of the Ballona Wetlands Ecological Reserve."

Neither SoCalGas nor Cal Gem or the Commission Staff cite to any safety need for abandonment of these wells. And, Commission Staff appear to have misunderstood both SoCalGas and Cal Gem since their own Summary states: no new replacement wells would need to be drilled, but are contradicted within their own reported information from either SoCalGas or Cal Gem that clearly states : **Two of the wells, DR 17 and DR 19, would be redrilled** from SocalGas' property, outside of the reserve. (Del Rey 19 is one of the wells requested for abandonment for the April 11, 2025 CCC Meeting)

Neither SoCalGas nor Cal Gem or the Commission Staff cite to any safety need or SCG operational need for abandonment of these wells. Yet, there are safety concerns for having to drill new replacement wells into the leaky, high pressure oilfield formation. Not the least of which is drilling within 3200' of sensitive receptors -namely homes and other urban wildlife habitat areas, a violation of SB 1137 per oilfield operations. Alas even though the dangers are greater for Underground Gas Storage (UGS) operations due to the high pressure operations within this leaky oilfield (CCST Report), Cal Gem states UGS operations may be exemptexcept for when leakage is not directly related to the underground gas storage (Webinar response by Cal Gem March 2025 which gives rise to greater scrutiny needs by OTHER agencies on behalf of the public.)

Additionally, no address is offered for potentially hazardous conditions that may arise and go unnoticed due to abandonment of these monitoring wells at this time. And, no address is given to the necessary long term monitoring of these wells for subsequent leakage, once abandoned.

The only reason Commission Staff assert, as reason for abandonment of these wells is: for the CDFW "Pending" Plans for Ballona. However, there is NO PENDING PLAN. Staff misleads Commissioners and the public by wrongfully asserting that there is a 'pending plan' having agreements between multiple agencies. Commission staff fail to inform Commissioners and the public that:

-CDFW's FEIR is now extinguished, there is NO PENDING Ballona Wetlands Restoration Project.

- There is **NO** Ballona Wetlands Restoration Project proposed by the Los Angeles County Department of Public Works under,

- **NO** joint United State Army Corps of Engineers (USACE) Environmental Impact Statement/ **NO** pending CDFW Environmental Impact Report (Ballona EIS/EIR) and **NO** (USACE AND CDFW 2017)etc.

-**Goals** for Ballona's restoration are undecided and shifted as new information from the Department of Water Resources acknowledging Ballona as a Groundwater Dependent Ecosystem via new laws, the Sustainable Groundwater Management Act require agency protections to Ballona that were never before considered, or required.

-**Goals** of the state and the City of Los Angeles support closure of the SoCalGas/ PDR operations. No address has been given to the potential thwarting of this goal by further replacement well drilling for Del Rey 19's needed safety monitoring of the oilfield.

Screen shot of Commission Staff's Recommendation information that today, is wholly inaccurate-

The Reserve area is part of the pending Ballona Wetlands Restoration Project proposed by the California Department of Fish and Wildlife (CDFW) and the Los Angeles County Department of Public Works under a joint United States Army Corps of Engineers (USACE) Environmental Impact Statement / CDFW Environmental Impact Report ('Ballona EIS/EIR') (USACE and CDFW 2017) that considers re-design of the Ballona Creek levee system, design of a meandering Ballona Creek, removal of fill material, removal and relocation of SoCalGas wells, and other on-site natural resource restoration activities. The restoration project aims to enhance tidal influence for certain areas of the Reserve and improve aquatic resource functions and services.

While SoCalGas' well abandonment activities are separate from the Ballona Wetlands Restoration Project, SoCalGas well removal activities from within the Reserve would directly support goals for the Ballona Wetlands Restoration Project.

"SoCalGas well removal activities from within the Reserve would *directly support goals for the Ballona Wetlands Restoration Project.*"

- **CDFW's plans for Ballona Wetlands have been extinguished** in court via efforts of the public. The Staff Report needs to embrace and reflect its acknowledgement of the extinguished FEIR, and neither Cal Gem nor the Commission should embrace/approve abandonments based upon the inaccurate Staff language of an ongoing Plan (FEIR) of CDFW inclusive of agreements with other agencies. The stated agreements are long extinguished.

- Ballona Wetlands is a predominantly freshwater driven ecosystem. New evaluations must be undertaken in order to protect the abundant freshwater resources of Ballona Wetlands.

- Neither SCG nor Cal Gem or the CCC Staff have taken into consideration the potential negative impacts upon Ballona's clean freshwater resources, both surface and the underlying freshwater aquifers classified by the LARWQCB as Drinking Water and Potential Drinking Water. Only short term 'abandonment' techniques are addressed for emergency spill purposes while the long term consequences of abandonment, including addressing **gas leakage from abandoned wells--as can be seen in the LINK showing the Cal Gem ignored oilfield gas leakage over the Playa Vista abandoned well--University City Syndicate in the Freshwater Marsh remains unaddressed. This area is under CCC Permit 5-91-463 and needs address by CCC.**

[2023 Grassroots Coalition Letter To CCC with new information Re: Groundwater Dependent Ecosystem under State GSA | Grassroots Coalition](#)

The [video of DOGGR PERSONNEL](#) garnering the location of University City Syndicate. Current leakage can be seen in the attached video of STONEBIRD documentation of Jonathan Coffin. <https://www.flickr.com/gp/stonebird/2h5k6L>. And, Grassroots Coalition/EarthWorks documentation of outgassing via FLIR imaging. <https://youtu.be/QDXIPAYaCHA>

Without the Coastal Commissioners and Commission Staff asking for answers, the public is left at the mercy of a non-responsive Cal Gem. Commission Staff have acknowledge their lack of understanding of oil/gas operations in the oilfield setting which provides opportunity/ need for a WORKSHOP to understand the area in order for informed decision-making.

And, there is no address of the likely negative consequences of drilling of new wells, creating more potential pathways for oil and gas leakage into the environment and built environment. None of this is being considered by CCC staff for SCG UGS operations that are still in full operational mode.

-Can the SCG/PDR operations be managed safely with all the abandonments of working and monitoring wells taking place? Staff does not provide response to this question and provides no actual information from Cal Gem that this is possible.

Grassroots Coalition et al v CDFW; Case No 21STCV06357 JUDGMENT 7/13/23:

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IT IS HEREBY ADJUDGED, ORDERED AND DECREED THAT:

1. Judgment shall be entered in favor of Petitioner in this proceeding.
2. A peremptory writ of mandate directed to Respondent California Department of Fish and Wildlife shall issue under seal of this Court, which shall direct Respondent to:
 - i. Decertify the Environmental Impact Report for the Project entitled “Ballona Wetlands Restoration Project” adopted on December 30, 2020, State Clearinghouse Number: 2012071090;
 - ii. Rescind the Project’s CEQA Findings;
 - iv. Invalidate all approvals of the Project;
 - v. Prepare and certify a legally-adequate Environmental Impact Report if it chooses to proceed;
 - vi. Suspend any activity that could result in an adverse change or alteration to the physical environment until Respondent fully complies with the requirements of CEQA;
 - vii. Notify, in writing, all Responsible Agencies that have relied on the Environmental Impact Report to implement the Project that the Environmental Impact Report has been decertified;

And the lead agency of support to the CDFW Ballona Project, the California Coastal Conservancy also acknowledges the Recission of CEQA Findings:



Rescission of CEQA Findings Related to the Ballona Wetlands Restoration Project


On December 30, 2020, the California Department of Fish and Wildlife ("CDFW") certified a final Environmental Impact Report ("EIR") under the California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq.*; "CEQA") for the Ballona Wetlands Restoration Project ("Project"), and made CEQA findings as the lead agency regarding the Project and the EIR.

On May 27, 2021, the State Coastal Conservancy ("Conservancy") made CEQA findings as a responsible agency regarding the Project and the EIR.

On July 13, 2023, the Los Angeles Superior Court entered judgment against CDFW in a challenge to the legal adequacy of the EIR under CEQA.

On September 28, 2023, in compliance with the court judgment, CDFW decertified the EIR and rescinded its CEQA findings regarding the Project, among other actions.

In recognition of the CDFW's decertification of the EIR and rescission of its CEQA findings for the Project, the Conservancy hereby also rescinds its May 27, 2021 CEQA findings regarding the Project.



Amy Hutzel
Executive Officer

1/23/24

Date

And,

- No consideration has been given with regard to MONITORING ANY AND ALL ABANDONED SCG WELLS.

-The Coastal Commission is bound by Coastal Act 30231 that roughly provides for the Commission's coastal protection for maintaining and restoring optimum organisms and human health where feasible. <https://www.coastal.ca.gov/coastalvoices/IntroductionToCoastalAct.pdf>

Therefore it is feasible for the Commissioners and Staff to ask for prudent reasoning for allowing SCG to abandon wells that currently provide normal operational status and are easy to locate and test for any potential leakage. Abandonment and cutting off the oil/gas pipes at 5' below the surface, significantly allows for 'out of sight, out of mind'.

-SCG has provided no monitoring maintenance plans for its abandoned wells. Abandoned wells throughout the Venice/ Playa del Rey and Ballona Wetlands area have a long history of leakage. Virtually all of the SCG wells in the Venice Peninsula that were previously abandoned were found to be leaking (SoCalGas v Grassroots Coalition / CPUC Case File). Without a rigorous, soil gas monitoring plan established for ensuring that SCG abandoned wells are routinely tested for leakage, no further approvals for abandonment of SCG wells by the CCC should be allowed. **This should be especially true when the well(s) requested for abandonment are in good working order, and neither SoCal Gas nor Cal Gem has provided operational reasoning for necessary abandonment.**

-The Commission, due to the well known/established history of the blowouts and leakage of the SCG/PDR

oil/gas operations, and having the knowledge that both the state of California's and the City of Los Angeles' joint agreements that **SCG/PDR operations should close down its operations**, should abide by Coastal Act 30231- (protection to the environment and public health and safety) by disallowing use of the extinguished CDFW Plan as reason for approving abandonment of any further working, monitoring wells.

-The Commission should abide by Coastal Act 30231, and 30240 thereby protecting the health and well being of the public via disallowing for new well drilling within 3200 feet of sensitive receptors. Especially when there is no functional problem associated with current SCG wells. And, protecting against any significant disruption of habitat values both long and short term.

-It is contrary to the Coastal Act's basic tenets of both protection and safety for Staff to dodge address of short and long term potential negative effects, leaving out critical evaluation by merely citing the Staff Recommendation **"does not evaluate the conformity of the underlying use."** In order to make a fully informed decision one needs to understand and evaluate the underlying uses to determine if there is conformance with the Coastal Act.

TIMELY INFORMATION not included in the Staff Recommendation or provided by CAL GEM-

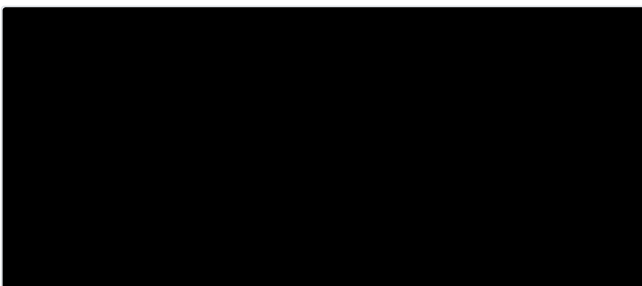
The Commission Staff Recommendation fails to include the Department of Water Resources' Sustainable Groundwater Management Act requirements that both acknowledges Ballona Wetlands as a Groundwater Dependent Ecosystem and provides a stringent list of protective freshwater hydrological evaluations that need to be performed in order to provide protection to Ballona's natural freshwater resources. **This issue is raised because the former, and now extinguished CDFW Plan to dig out Ballona and convert its predominantly freshwater driven ecosystem into a fully tidal saltwater bay thwarts the protection of Ballona as a Groundwater Dependent Ecosystem (GDE)** . The Staff Summary and Cal Gem fail to alert Commissioners to the extinguished CDFW Plan. Instead, Staff, SCG and Cal Gem appear to use the wrongful information as reason for allowing approval of well abandonments.

- Assuming the CDFW Plan was still in effect (which it is not) Staff's apparent belief is that the CDFW FEIR Plan is still going to happen. Yet, Staff utterly fails to also provide comment or evaluation, or seek response from Cal Gem as to the difficulties of addressing leakage of abandoned wells in a saltwater inundated environment. Staff provides an approval recommendation without ever acknowledging or attempting to evaluate or ask Cal Gem about corrosive saltwater effects upon abandoned oilwells which gives rise to oilfield/reservoir gas leakage.

And, creates a physical difficulty of reaching a leaking abandoned well for both testing and reabandonment needs. **This is already self evident in the failure to address and stop the ongoing oilfield gas leakage over University City Syndicate in the Freshwater Marsh.** <https://www.flickr.com/gp/stonebird/2h5k6L>

[Playa Del Rey Field, Los Angeles County, CA \(April 2019\)](#)

2019, FLIR imaging showing the oilfield gas off gassing over University City Syndicate.
EarthWorks & Grassroots Coalition



Playa Del Rey Field, Los Angeles County, CA
(April 2019)

Background of SoCalGas/ Playa del Rey operations

<https://www.socalgas.com/sustainability/pipeline-and-storage-safety/playa-del-rey-storage-operations>

The included soil gas studies were all part of a Settlement Agreement with Grassroots Coalition. SoCalgas has provided no comprehensive follow up to this evaluation which gave rise to the first in its history-- closure by the Division of Oil and Gas (aka Cal Gem) of SCG /PDR operations for approximately 1 year due to reservoir gas leakage to the surface that was discovered due to this never-before-required comprehensive evaluation.

https://saveballona.org/system/files/Grassroots_Coalition-Southern-California-Gas-Company_Settlement_Agreement.pdf

What, if any similar evaluations are being done in present day SCG/PDR operations to protect the public and the environment?

<https://www.saveballona.org/gasoilfields/endreslabasin.pdf>. See Playa del Rey SCG operations

- SCG intends to abandon 16 wells. SCG claims that it intends to REPLACE (DRILL NEW WELLS) 6 of their wells on property confined to their own above ground operations. However, what is not stated is that, **ALL WELLS ULTIMATELY LEAK.**

Underground gas storage operations within the oilfield setting is dangerous. The high pressure operations of SCG within the acknowledged corrosive environment (SCG/PDR is also a SOUR OILFIELD meaning it forms hydrogen sulfide H₂S, a deadly and highly corrosive oilfield gas.) The area is also corrosive due to saltwater intrusion along the coastal and Marina del Rey edge.

-SCG /PDR abandoned wells have a very long history of leakage and most, if not all wells of SCG have had to be reabandoned. What regular monitoring is being offered by SCG and mandated by Cal Gem to protect the public from leakage of oilfield and reservoir gas leakage into their homes and the environment?

SCG/Playa del Rey website misleadingly includes protective soil gas studies and monitoring that is no longer being implemented and is now very outdated.

-SCG/PDR has provided no new soil gas studies as was implemented as a result of their Settlement Agreement with Grassroots Coalition. This, after studies revealed reservoir gas leakage to the surface, and SCG was compelled to alert the public --for the first time- and acknowledge its reservoir gas leakage to the surface.

-SOCALGAS, cites their intent to abandon 16 wells, what is the justification for the abandonment from a safety perspective. Considering SoCalGas' continued high pressure operations in the Playa del Rey oilfield, what safety issues arise with the abandonment of so many wells including so many 'monitoring wells'?

-Drilling 6 new replacement wells gives rise to new avenues of future gas leakage into the environment.

-Abandonment of 16 wells without annual soil gas monitoring as follow up to protect against the inevitable gas leakage from their abandoned wells is a recipe for disaster.

"Potential consequences arising from underground gas storage failures, such as large-scale loss-of-containment by well blowouts, include threats to safety and loss of life, in addition to potential environmental impacts and impacts to the underground gas storage infrastructure itself. Lower flow-rate loss-of- containment through surface infrastructure such as leaky valves may also be a concern for its effects on climate, because methane is a powerful greenhouse gas, and subsurface leakage of reservoir gases and associated components is a concern for contamination of groundwater. In addition, failure of underground gas storage can lead to the inability to provide gas to the energy network, a hazard to the stability and reliability of California's energy infrastructure." Page 11 [CCST Report](#)

These are all questions and issues that the Coastal Commission and Staff need to seek out answers on behalf of the public and the environment and importantly--for their decision making under Chapter Three of the Coastal Act.

<https://www.socalgas.com/sustainability/pipeline-and-storage-safety/playa-del-rey-storage-operations>

The Staff Report does not determine if the underlying uses are in conformance with Chapter Three provisions of the Coastal Act. Unless the Commission knows the underlying use is in conformance with the Act, it is impossible to make a decision that is consistent with the Act.

The SCG/PDR oil/gas operations have the distinction of being the only underground gas storage operations within an oilfield setting in the United States that is being operated directly under homes, whole neighborhoods and an environmentally sensitive ecological reserve. Such ultra hazardous operations deserve exceptional scrutiny and, at the very least, time given from the Commission to provide health and safety issue answers to the public and for its own understanding of what these operations entail.

Please say NO to the SoCalGas request to abandon monitor wells Del Rey14 and Del Rey 19 unless and until the public and the Commission are able to make an informed decision.

Patricia McPherson, Grassroots Coalition

<https://www.coastal.ca.gov/coastalvoices/IntroductionToCoastalAct.pdf>

From: patriciamcpherson1@verizon.net
To: Energy@Coastal; ExecutiveStaff@Coastal; Turnbull-Sanders, Effie@Coastal; Bochco, Dayna@Coastal; Hart, Caryl@Coastal; Notthoff, Ann@Coastal; Escalante, Linda@Coastal; Lowenberg, Susan@Coastal; Wilson, Mike@Coastal; Aguirre, Paloma@Coastal; ariel.kelly@coastal.ca.gov; Harmon, Meagan@Coastal; Uranga, Roberto@Coastal
Cc: jeanette.vosburg; [Todd T. Cardiff Esq.](mailto:Todd.T.Cardiff.Esq.); Willis, Andrew@Coastal; Haage, Lisa@Coastal
Subject: CCC Meeting April 11, 2025 Item 8 App. 9-23-0818 oppose approval
Date: Friday, April 4, 2025 2:47:02 PM

Coastal Commissioners and Staff,

SoCalGas Application 9-23-0818 Del Rey 14, 19, Oppose Approval

NEED FOR CALIFORNIA COASTAL COMMISSION ENGAGEMENT IN FACT FINDING--WORKSHOP.

The public and the California Coastal Commission(CCC) cannot solely rely upon Cal Gem for knowledge and oversight of SoCalGas operations as Staff has opined in recent meetings regarding the work-overs and abandonments ongoing in the Ballona Wetlands. CCC Staff acknowledged their lack of knowledge of oilfield operations and we thank them for their honesty. However:

Cal Gem's role in SoCalGas/Playa del Rey oilfield's underground gas storage operations has been extensively AFTER - THE - FACT of a lengthy history of explosions, oil & gas well leakages including reservoir gas leakage into the subsurface and surface with gas migration movement offsite of the 240 acres approved for SoCalGas storage operations.

University City Syndicate in the Freshwater Marsh continues to have oil field gas leakage directly overtop that Cal Gem has ignored. [video of DOGGR PERSONNEL](#)

<https://www.flickr.com/gp/stonebird/2h5k6L>

[SoCal Gas Oil and Gas Field INCIDENTS UPDATED 6-15-19 BY Patricia McPherson, Grassroots Coalition](#)

In fact, it has been oil and gas expert members of the public and Grassroots Coalition's investigation of and prevailing litigation against SoCalGas/ PDR via the California Public Utilities Commission that has provided the most comprehensive illumination of SoCalGas' hazardous operations. And that provided for the most comprehensive subsequent evaluation measures that led to the Division of Oil & Gas' (now known as Cal Gem) shut down of SoCalGas/PDR operations for approximately 1 year (2010) due to reservoir gas leakage to the surface.

The Grassroots Coalition imposed evaluations upon SoCalGas/Playa del Rey which gave rise to illumination of reservoir gas leakage to the surface that required extensive and lengthy management is over.

It is time for help from others, including the CCC to at least assist in asking the

hard questions and garnering comprehensive, honest answers that are necessary for the protection of this coastal landscape and its inhabitants.

Reservoir gas leakage has again been found to be leaking from monitoring wells Del Rey 4 or 9 in the 'Flats' Area B of Ballona Wetlands. Corrosion concerns continue.

A WORKSHOP is requested and can be created and held by the CCC to provide for informed decision-making for the future of this entire coastal area. Ending the ongoing and dangerous piecemeal approach of oversight and action for this region is long overdue.

History and Hazards of the Playa del Rey Oilfield and SoCalGas Underground Gas Storage Operations

The Ballona Wetlands and overlying & surrounding neighborhoods at stake:

YouTube video links for the NBC Peabody Award News Series “**Burning Questions.**” Provided below are several segments of the series that provides a background about the history and hazards of the Playa Vista Development Site's nexus with Ballona Wetlands Resilience Plans and **the SoCalGas, Playa del Rey's Underground Gas Storage Operations** that are directly under and adjacent to numerous other neighborhoods in this Los Angeles coastal area.

Each video (1-4) is about 17 min. NBC won a Peabody Award for this news series as indicated in the last video, that's about 3 min. Comedian Jon Stewart presented it.

The series features Patricia McPherson, Grassroots Coalition President; **Florence Gharibian, former Department and Toxic Substance Control official**; Loretta Lynch, former Lead of the Public Utilities Commission ; Waterboard officials, **LAUSD Angelo Bellomo (Part 2 Segment which references the potential LAUSD Playa Vista Elementary SCHOOL SITE)**, and many others.

[Burning Questions NBC 4 — Part 1](#)

[Burning Questions NBC 4 — Part 2](#)

[Burning Question NBC 4 — Part 3](#)

[Burning Question NBC 4 — Part 4](#)

[Burning Questions — 2005 Peabody Award Acceptance Speech](#)

Thank you,
Patricia McPherson, Grassroots Coalition



Coastal Lands
CLAN
Action Network



April. 4, 2025

F8a

The Honorable Caryl Hart, Chair
Honorable Commissioners & Staff
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Sent via email to Staff

*Re: Application # 9-23-0818, Applicant: Southern California Gas Co. (SoCalGas), Location: Ballona Wetlands Ecological Reserve (BWER), City and County of Los Angeles - **OPPOSE***

Dear Commission Chair Hart and Commissioners:

First, **we are opposed to this application being approved**, in significant part because there is a Court injunction on this property, specifically related to the work contemplated to be performed on these gas wells. Please read the March 24, 2024 letter from Jamie T. Hall at Channel Law Group, sent to the Commission's Executive Director, to understand better why this Court injunction applies here. Please also include that letter by reference for your analysis and consideration of this approval, which we believe should be **denied** due to this injunction order and due to non-compliance with piecemealing and California Environmental Quality Act/

CEQA-equivalency requirements as explained in a letter dated April 4, 2025 submitted to your staff also by our counsel, Jamie T. Hall of Channel Law Group. Further, this letter underscores our opposition and why this application is incomplete and also misrepresents underlying facts your staff relies on in its recommendation.

Second, a big thanks to staff for bringing this matter before you and for requiring significant information from the applicant to even consider this application. In years past, SoCalGas and other fossil fuel operators have relied on the fact that the Coastal Act, CEQA and other environmental laws did not apply to them because, they argued, these laws were not in effect when they first began work in California.

Fortunately, there is now broad recognition in our state that not only must we work to phase out all fossil fuel use in a very short time if we are to escape the worst possible impacts from climate change, but that these companies also must be held accountable for public health and environmental impacts while they are still providing energy resources and while we are ramping up genuine renewable energy resources sufficient for complete shut downs of oil and fossil gas operations, like the ones that are the focus of this application.

The Ballona Wetlands Ecological Reserve (BWER) and surrounding natural areas and rookeries that are part of the historical Ballona Wetlands and natural coastal areas, are complicated, as much of Nature is, and yet, piecemealing of this complex habitat has been common place over the decades, but the public understands the complexity and the simplicity of needing to protect this fragile remnant mosaic of habitats that is currently

providing food and shelter to seven breeding endangered species and numerous species on the California List of Species of Special Concern.

On behalf of the public interest, we aim to break down the facts applying to this specific application. Here - in detail, and hopefully, enlightening, are reasons why this application must be denied.

1. The Superior Court said “no.”

Court Ruling and Injunction:

“A writ shall issue directing CDFW to set aside the FEIR and any project approvals, prepare and certify a legally adequate EIR for the Project if it chooses to proceed, and suspend any Project activity that could result in an adverse change or alteration to the physical environment until CDFW complies. An injunction shall also issue prohibiting CDFW from taking any action pursuant to the Project until it complies with CEQA.” [Highlight added.]

2. This application would impact more than the easement and sub-surface mineral rights owned by SoCalGas in the Playa del Rey Oil Field.

According to the staff report, there would be impacts on habitat beyond their easements from this work applied for by SoCalGas. CDFW would need to approve of this work. They cannot do so, according to the Court injunction.

During the Coastal Commission hearing in July, 2024, related to two other gas well construction projects, the Commission sought guidance from Counsel, and while Counsel stated accurately that the writ was directed at the California Department of Fish & Wildlife (CDFW), Counsel ignored the fact that some of the work would impact the BWER and is outside of the easement that SoCalGas has – spilling out onto the ecological reserve where the work would destroy native plant habitat including Coyote Bush *Baccharis pilularis* and other native plants that are integral to a functioning ecosystem.

Coyote Bush, for example, has been known by scientific researchers to host dozens of insects (including numerous pollinators) that are the basis for the food web. Seep Willow – AKA Mulefat - *Baccharis salicifolia* is another important plant population in this area called out for destruction in the staff report, and is outside of the SoCalGas easement, which means that CDFW needs to provide approval for this work, which is prohibited by the Court.

According to the Applicant's staff report, there would be "vegetation clearing"

"Vegetation clearing" is defined as removing and disposing of all unwanted vegetative matter from underground, such as stumps, roots, buried logs, and other debris.

By definition, this project would result in "alteration to the physical environment" – which the Court has disallowed by its Injunction.

According to the staff report, trees would be impacted. Contrary to the staff report, there are ESHA and wetlands in the area where this construction activity is contemplated.

Besides the obvious need to comply with the Court's Injunction order, the impacts to trees, vegetation and soils are directly related to carbon sequestration and carbon storage – neither of which has been adequately considered in this application. We recommend an alternative to the proposed staff report recommendation that would avoid the destruction of all native plant populations in the Ecological Reserve, which would substantially lessen the significant adverse impacts of the development on the environment, including carbon sequestration and storage, as well as native plant populations. Our recommendation would allow the Commission to comply with its findings that:

Approval of the permit complies with the California Environmental Quality Act (CEQA) because either (1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or (2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

Additionally, there are impacts to other species which have not been analyzed – in part because a full environmental impact report (EIR) should be completed on all of the gas well construction sites that are outlined in the EIR which Coastal Commission staff originally commented on, including submitted comments that sought further information about

leaking gas wells, which are clearly part of the project site and cannot be considered separately from other components of the ecological reserve.

In the staff report, this is stated about the Burrowing Owl *Athene cunicularia*:

Burrowing owls (Athene cunicularia) have been observed in Area A according to its eBird list; however they are considered rare transients in fall and winter are not known to breed in the BWER (Cooper 2006).

The Burrowing Owl was determined by the California Fish & Game Commission late last year to be considered eligible for the state's Endangered Species List and is, thus, required to be treated for the entire next year as if it is Endangered while staff makes final recommendations based on further scientific research. Regardless of its breeding status at Ballona, this ecological reserve provides habitat for the species during important wintering season time, which allows the species to thrive during its breeding time in the spring and summer. The Commission's staff report does not even acknowledge this newly designated status nor the potential harm to the species due to impacts from this proposed development.

3. Piecemealing – This application alone underscores our argument that the State agencies and SoCalGas are relying on a piecemealing approach to environmental regulations – which is prohibited by the California Environmental Quality Act and the Commission's CEQA-equivalency.

What the Superior Court Ruled on in summer, 2023:

As you can see, as referred to in Channel Law Group’s March 24, 2024 letter, on pg. 2-111 of the Environmental Impact Report (EIR) for the “Project” at Ballona,

DEIR Well and Pipeline Abandonment and Relocation Plans (DEIR p. 2-111)

FIGURE 2

**TABLE 2-5
 PRIORITIZED PLAN FOR GAS WELL DECOMMISSIONING**

Alt 1	Area A	Area B
Phase 1		Modify pipeline serving Area A from proposed Culver Boulevard levee to existing Creek crossing (e.g., replace section of pipe at lower elevation to accommodate levee construction and wetland restoration).
	Abandon inactive Area A pipeline.	Drill replacement well from main plant area to replace Del Rey 12 and plug and abandon Del Rey 12 to allow for channel excavation.
	Modify the abandoned Del Rey 16 well as needed to accommodate restoration grading (e.g., re-abandon or over-excavate). This well is assumed to be 5 feet below grade and would require a pothole to locate the well.	Relocate Line 1167 Pipeline In Southeast B Into The Gas Company Road.
Phase 2	Drill replacement wells from main plant area to replace Del Rey 17, 18, and 19. Note that Del Rey 18 is located off site at the end of Fiji Way.	Drill replacement well from main plant area to replace Del Rey 9 and Vidor 18.
	Plug and abandon Del Rey 13, 14, 15, 17, 18, and 19.	Plug and abandon Del Rey 4, 5, 9, 11 and Vidor 1, 2, 3, 5, 14, and 18.
	Abandon active pipeline serving Del Rey 18 (from Del Rey 18 to the Gas Company facility).	

- plugging and abandoning gas well Del Rey 14 is described as being PART of the PROJECT proposed for the Ballona Wetlands - it’s in Phase 2 of a project that now has a DECERTIFIED EIR and also has an injunction that states no work is to be done at the site that would alter the physical environment, and that includes these fossil gas well

sites, which are included in the Project DESECRPTION, as well as in the maps shown for the Project site in the EIR.

- Del Rey 19 is not only described as being PART of the PROJECT proposed for the Ballona Wetlands - it's in Phase 2 of a project that now has a DECERTIFIED EIR and also has an injunction that states no work is to be done at the site, which includes these gas well sites - but Del Rey 19 also is scheduled in the now-decertified EIR to be REPLACED and redrilled from the main site – which signifies slant drilling, as described elsewhere in the EIR.

In other words, this is not solely a well abandonment project, but the plan, as outlined in the EIR and quoted from in the Channel Law Group letter, is to install NEW FOSSIL FUEL INFRASTRUCTURE - slant drilling into the Playa del Rey Oil Field - to extend the life of a fossil gas facility that needs to be closed if we are serious about limiting climate impacts, as we should be.

The application submitted by SoCalGas is incomplete and misleading.

SoCalGas does not reveal what is revealed in the Ballona Wetlands Restoration EIR that their infrastructure abandonment and RELOCATION was included in – that the wells they are telling one agency – the CA Coastal Commission – is merely a well abandonment project, is actually part of a larger plan to install new fossil fuel infrastructure, including

pipelines and slant drilling wells – thereby extending the life of their fossil gas storage facility for decades into the future – an eventuality that our climate and many of the species living here on Earth cannot withstand.

4. Disruption of Public Access:

We are also very concerned about the disruption of public access along the Fiji Way Trail. Our organizations, along with many others, testified at numerous Coastal Commission, Coastal Conservancy, State Lands Commission and Fish & Game Commission hearings, seeking the opening of public access trails which would offer the public a glimpse of and education about the coastal resources the State of California invested significant funds to acquire (\$140 million in 2003.)

There are absolutely *feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment* that would need to be considered in order to make up for the public's loss of access during the time of construction. Those mitigation measures should be considered.

We are in talks with County officials about constructing a trail along Fiji Way on their easement land, outside of the ecological reserve's fence, and SoCalGas could and should be required to fund at least the cost of the permitting of this project and the oversight of volunteers to insure this project moves forward. That would be a feasible mitigation measure that would lessen the adverse effects of

the development on the environment and public access and enjoyment of the environment. This is the sign that was placed on the gates during the construction work on Del Rey 17 – and it would likely be similarly posted when much of the work on these two additional wells are in progress. There must be adequate mitigation for this loss of public access.



5. Additional Incomplete Information in the Application

The application has incomplete information about the endangered Least Bell's Vireo *Vireo bellii pusillus*, a federal and state Endangered Species. This endangered songbird has been documented nesting in vegetation along the north levee of the Ballona Creek estuary, close enough to the Del Rey 14 and Del Rey 19 fossil gas well sites that sounds and equipment and human movements associated with this proposed development project would impact this species' habitat. There is no evidence of a Biological Opinion from the US Fish & Wildlife Service or the federal Recovery Team for this species, and that would be necessary for this application to be deemed complete.

6. The Bigger Picture

Finally, the answer to the problems of an antiquated fossil gas storage facility, including leaking due to corroded infrastructure and/or due to the natural process of fossil gas existing and moving is not to prop up a facility with new fossil fuel infrastructure of slant drilling into the same size gas storage facility under the Ballona Wetlands Ecological Reserve – the only state ecological reserve in all of Los Angeles County – but to take actions that move us toward stopping the inflow of the methane fossil gas from other states and replacing this fossil fuel with genuine renewable energy sources. **You – the California Coastal Commission - can take one of those actions today.**

In March of last year, **California EPA Secretary Yana Garcia** emphasized that the current science acknowledges that methane fossil gas (formerly referred to as “natural gas”) is much worse of a contributor to climate change impacts than scientists had previously thought. **She stated it is clear that methane is a pollutant 25 times more potent than CO2.**

Say “no” to this application and instead ask the applicant to return with a non-piecemealed, full proposal for moving toward stopping the injection of methane fossil gas at the Ballona Wetlands Ecological Reserve, contemplating converting the gas servicing roads to wildlife corridors and walking trails, leaving some of the infrastructure in place for habitat suitable for bats and other species, and make this area safer for wildlife, for visitors from throughout the County and for residents and beach-goers who will all be impacted if this operation is propped up to continue on.

Sincerely,

Robert J. 'Roy' van de Hoek /s/
Robert J. 'Roy' van de Hoek
Biologist & Environmental Scientist
Ballona Institute

Wendy-Sue Rosen /s/
Wendy-Sue Rosen
President & Co-Founder
Protect Ballona Wetlands

Marcia Hanscom /s/
Marcia Hanscom
Community Organizer
Defend Ballona Wetlands

Dee Fromm /s/
Dee Fromm
Managing Director
Coastal Lands Action Network

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JULIAN K. QUATTLEBAUM, III
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*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

April 4, 2025

VIA EMAIL

F8a

The Honorable Caryl Hart, Chair
Honorable Commissioners & Staff
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
eorfc@coastal.ca.gov

**Re: Application # 9-23-0818; Applicant: Southern California Gas Co. (SoCalGas),
Location: Ballona Wetlands Ecological Reserve, City and County of Los Angeles;
OPPOSE**

Dear Commission Chair Hart and Commissioners:

On behalf of my clients, Defend Ballona Wetlands and Protect Ballona Wetlands, we are opposed to this application for a Coastal Development Permit being approved for the following reasons.

I. APPROVING THE CDP IS NOT ALLOWED UNDER CEQA

Approving this CDP is not allowed under the California Environmental Quality Act (CEQA) or CEQA-equivalency that the Coastal Commission is required to comply with - in part due to piecemealing of a larger project that SoCalGas and the Coastal Commission are aware of. (see Exhibit A, wherein SoCalGas in a letter on February 13, 2023, wrote to Commission staff seeking an exemption request for: **Southern California Gas Company's Del Rey 14, 17 & 19 and Vidor 15 Plug & Abandonment Project, Playa del Rey Natural Gas Storage Facility, Exemption Request**).

In other words, this April 11 CDP approval is for Del Rey 14 & Del Rey 19, whereas Del Rey 17 work was already permitted by the CCC and completed by the applicant. Vidor 15 work is still being considered by the City of Los Angeles, according to a notice posted at the Ballona Wetlands Ecological Reserve ("BWER") (See Exhibit B).

In order to fully comply with the CEQA Equivalency requirements for the Coastal Commission, at least all four of these well construction projects should have been considered together, and not piecemealed so as to “*avoid full environmental review, potentially obscuring the project's overall impact.*”

Notes re: CEQA Equivalency and Piecemealing:

In the context of the California Environmental Quality Act (CEQA), "equivalency" refers to state regulatory programs, like those for timber harvest or coastal development, that are certified to meet CEQA's goals and are considered "functionally equivalent" to an Environmental Impact Report (EIR.)

In CEQA (California Environmental Quality Act), "piecemealing" refers to an agency breaking a large project into smaller parts to avoid full environmental review, potentially obscuring the project's overall impact. This practice is generally prohibited because CEQA requires a review of the "whole" project, including cumulative impacts.

The staff report states as findings that include:

Approval of the permit complies with the California Environmental Quality Act (CEQA) because either (1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or (2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

It is impossible to make this finding without considering the impacts, **including the cumulative impacts**, of at least all four of these well construction projects together – so that “further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment” are considered OR that “*feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment*” – related to at least all four of these well construction projects.

II. A BROADER CEQA REVIEW IS REQUIRED

Additionally, and **for the same legal reasons articulated above**, there is a broader CEQA or CEQA-equivalency review required because these four gas well construction projects were included in an even larger project that was part of a “restoration” project that has been contemplated for at least 13 years (Scoping announcement, Summer, 2012) at the Ballona Wetlands Ecological Reserve (BWER.)

At the July, 2024 hearing of the Commission when the staff attorney was asked about whether or not two other well construction projects were part of the larger restoration project,

staff erroneously claimed they were not – possibly informed incorrectly by either the applicant or the underlying landowner, CA Department of Fish & Wildlife (CDFW), which has ignored their own EIR, which is now decertified by a Superior Court Judge.

In fact, the project site description in the Environmental Impact Report (EIR) for the restoration at Ballona included the following language:

On page 1-20 of the draft EIR, it states:

*As discussed in Section 1.1.1, the Project site includes the Ballona Reserve and **seven potential natural gas storage well relocation sites (Sites 1 through 7) proposed within the SoCalGas Property** located adjacent to the Ballona Reserve. See Figure ES-1, Regional Location, and Figure ES-2, Project Site.*

Also the project site description in the combined Environmental Impact Statement (EIS) and Environmental Impact Report (EIR) for the restoration at Ballona included the following language:

Page. ES-4

Natural gas storage wells and associated pipelines owned and operated by the Southern California Gas Company (SoCalGas) are located within the Ballona Reserve. The active storage wells ...would be relocated to SoCalGas's property adjacent to the Ballona Reserve as part of the Project and, similarly, the natural gas pipeline also would be relocated. The potential natural gas storage well relocation sites (Sites 1 through 7, the "SoCalGas Property") and the Ballona Reserve together constitute the "Project site" for purposes of this EIS/EIR.

Additionally, the project description in the EIR stated:

Page. 1-11

The Proposed Action includes the following restoration-related components:

5. Modifying existing infrastructure and utilities as necessary to implement restoration activities, potentially including the abandonment or relocation of SoCalGas wells and pipelines;

The relocations of several of these wells is part of the overall project described in the EIR which Superior Court Judge Chalfant ordered to be decertified, and also ordered CDFW (CA Dept of Fish & Wildlife) to notify all agencies considering permitting for any part of this proposed project – including the California Coastal Commission - of an injunction he placed on

the ecological reserve. This firm also wrote directly to the Commission's Executive Director about this injunction on May 20, 2024.

While abandonment of these two wells is being contemplated in this permitting staff report, there are numerous other wells included in the project at Ballona and also being considered in piecemeal fashion, and there also is the impact of "relocating" or drilling new wells into the Playa del Rey oil field at the BWER.

If only the abandonment of these two wells, Del Rey 14 and Del Rey 19 are reviewed, there is no adequate review possible under CEQA or the Commission's CEQA equivalency requirements to insure that: *either (1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or (2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.*

See this chart from the now-decertified EIR that includes project components that are under Injunction from the Court. You will note that both Del Rey 14 and Del Rey 19 are included in this chart of Well and Pipeline Abandonment and Relocation Plans that are part of the Ballona Wetlands Ecological Reserve restoration project. Note also that Del Rey 19 is part of a plan to "drill replacement well[s] from main plant area" – which is described elsewhere in the EIR as a slant drilling operation.

The slant drilling is continually ignored by the applicant in its correspondence to the Coastal Commission, possibly because that clarifies even further why all of the components of this proposed project need to be analyzed and considered together.

(intentionally omitted; see next page)

DEIR Well and Pipeline Abandonment and Relocation Plans (DEIR p. 2-111)

FIGURE 2

**TABLE 2-5
 PRIORITIZED PLAN FOR GAS WELL DECOMMISSIONING**

Alt 1	Area A	Area B
Phase 1		Modify pipeline serving Area A from proposed Culver Boulevard levee to existing Creek crossing (e.g., replace section of pipe at lower elevation to accommodate levee construction and wetland restoration).
	Abandon inactive Area A pipeline.	Drill replacement well from main plant area to replace Del Rey 12 and plug and abandon Del Rey 12 to allow for channel excavation.
	Modify the abandoned Del Rey 16 well as needed to accommodate restoration grading (e.g., re-abandon or over-excavate). This well is assumed to be 5 feet below grade and would require a pothole to locate the well.	Relocate Line 1167 Pipeline In Southeast B Into The Gas Company Road.
Phase 2	Drill replacement wells from main plant area to replace Del Rey 17, 18, and 19. Note that Del Rey 18 is located off site at the end of Fiji Way.	Drill replacement well from main plant area to replace Del Rey 9 and Vidor 18.
	Plug and abandon Del Rey 13, 14, 15, 17, 18, and 19.	Plug and abandon Del Rey 4, 5, 9, 11 and Vidor 1, 2, 3, 5, 14, and 18.
	Abandon active pipeline serving Del Rey 18 (from Del Rey 18 to the Gas Company facility).	

Please read my letter of May 20, 2024 (Jamie T. Hall at Channel Law Group) sent to the Commission’s Executive Director, to understand better why this Court injunction applies here. Further, this letter underscores our opposition and why this application is incomplete and also misrepresents underlying facts your staff relies on in its recommendation. Please also include that May 20, 2024 letter and all corresponding exhibits in their entirety as part of your record for considering approval of this proposed project.

Finally, given that your staff report outlines the need for “mitigation” to replace native plant habitat that would be destroyed during the gas well construction related to Del Rey 14 and Del Rey 19, it is clear that this work would violate the Superior Court injunction, which states, in part:

Court Injunction:

Suspend any activity that could result in an adverse change or alteration to the physical environment until Respondent fully complies with the requirements of CEQA.

California Coastal Commission
April 4, 2025

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall

Cc: wetlandact@earthlink.net

EXHIBIT A



Anthony A. Klecha
Team Lead, Planning & Project Support
Environmental Services Department
Southern California Gas Company
555 W. 5th Street, GT02A
Los Angeles, CA 90013
Tel: (213) 231-6230
aklecha@socalgas.com

February 13, 2023

Julia Kelly
Environmental Scientist
California Coastal Commission
Energy, Ocean Resources & Federal Consistency
455 Market Street, Suite 228
San Francisco, CA 94105-2420

Southern California Gas Company's Del Rey 14, 17 & 19 and Vidor 15 Plug & Abandonment Project, Playa del Rey Natural Gas Storage Facility, Exemption Request

Dear Ms. Kelly:

Southern California Gas Company (SoCalGas) proposes to perform a complete plug and abandonment of four (4) of its existing wells: Del Rey (DR) 14, 17 & 19 and Vidor (V) 15 at its Playa del Rey Natural Gas Storage Facility. Please find attached an Application for Written Exemption for the California Coastal Commission's (Commission) review and consideration.

Project Description

SoCalGas proposes to perform a complete plug and abandonment of four (4) of its existing wells: DR-14, 17 & 19 and V-15 at its Playa del Rey Natural Gas Storage Facility. The process of abandoning each well would include bringing in a workover rig to remove the downhole piping, setting cement plugs to isolate the hydrocarbon and fresh-water bearing zones, removing the wellhead, cutting the well casing, then capping the well approximately five feet (5') below grade. All concrete cellar material, exposed piping, and rig anchors would be removed. DR-19 will require a replacement well redrilled from SoCalGas' property, outside of the coastal zone. See Appendix A - Well Relocation Site (Site 1).

SoCalGas proposes to start work at Vidor 15 as soon as we receive the authorization to do so. Work on the other wells will follow and continue through approximately 2024. Depending on timing and guidance received from California Geologic Energy Management Division (CalGEM), initial well work may include Mechanical Integrity Testing (MIT) to ensure compliance with requirements for underground storage projects. SoCalGas anticipates that the abandonment of each well will take approximately 12-16 weeks to complete. MIT work is expected to take approximately 3-4 weeks to complete per well.

The equipment required to complete the abandonment and MIT work is virtually the same: both will require a workover rig, an accumulator, a diesel generator, a rig pump, a portable storage tank, and at varying times, pump trucks (concrete pump trucks for the abandonment

work), a wireline truck, a stinger/crane truck, and a flatbed trailer (see Appendix B - Plan Drawings).

Implementation of the project will require minor vegetation grubbing within and adjacent to the edges of each well pad. No wetlands will be impacted. Work area boundaries are shown in the attached delineation report (see Appendix C – Aquatic Resources Delineation Report).

Like SoCalGas' Vidor 5 Plug & Abandonment Project, which had previously been authorized via an exemption by the Commission, these wells also lie within the Ballona Wetlands Ecological Reserve (Reserve). As identified in the Ballona Wetlands Restoration Project's EIS/EIR, the abandonment of these wells will allow for a larger wetland restoration footprint.

Avoidance and Minimization Measures (AMMs)

SoCalGas proposes to implement the following AMMs to ensure potential impacts to the environment are avoided or minimized to the extent feasible:

1. **Vehicle and Equipment Cleaning.** To minimize the spread of invasive weeds, project-related vehicles and construction equipment will be cleaned prior to entering the Reserve.
2. **Work Areas.** The access road and work area will be flagged, fenced or otherwise marked prior to construction to alert crew members of the project boundaries. The contractor will prohibit any construction-related traffic outside of these boundaries. Upon completion of the work, the flags/barriers will be removed.
3. **Sound Walls.** SoCalGas proposes to install sound walls at each work location to reduce noise and dust. Upon project completion, the sound walls would be removed.
4. **Speed Limits.** Project-related vehicles shall observe a 5-mile-per-hour speed limit within the Reserve.
5. **Trash Clean-up.** All food-related trash items such as wrappers, cans, bottles, and food scraps generated during project construction will be disposed in closed containers and removed at least once a week.
6. **Pets & Wildlife Feeding.** Pets will be prohibited onsite, and no deliberate feeding of wildlife will be allowed.
7. **Spill Control.** If vehicle or equipment maintenance is necessary, appropriate secondary containment shall be used. Any accidental spills shall be cleaned-up immediately. All waste material shall be disposed of pursuant to appropriate methods and procedures.
8. **Storm Water Runoff.** Appropriate best management practices shall be installed to prevent storm water runoff from flowing off work areas (e.g., fiber rolls, sandbags, stockpile management, etc.).

9. **Dust Control.** Disturbed areas shall be watered to minimize dust.
10. **Qualified Biological Monitor.** A qualified biological monitor will be onsite for all set-up and teardown activities, and during initial grading work. The monitor shall be responsible for:
- Construction crew training regarding environmentally sensitive areas
 - Ensuring work limits are marked
 - Overseeing the installation and removal all sound walls
 - Authority to stop work
11. **Site Restoration.** SoCalGas will coordinate with the CDFW Reserve Manager to determine an appropriate seed mix for dispersal upon completion of each of the proposed work areas.

Project Purpose

The purpose of the proposed project is to ensure compliance with CalGEM regulations specified under sections 1723, 1726.4.2 and 1726.6 of Title 14 of the California Code of Regulations (CCR). SoCalGas is concurrently seeking Permits to Conduct Well Operations from CalGEM for the proposed project (copies will be provided to the Commission upon receipt).

Exempt from a Coastal Development Permit

The proposed project will not have a risk of substantial adverse impact on public access, environmentally sensitive habitat areas, wetlands, or public views to the ocean. Therefore, the provisions of 14 CCR 13252(a)(3) do not apply.

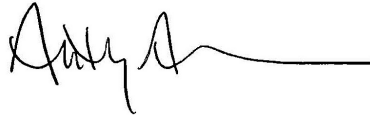
In consideration of the above, SoCalGas respectfully requests the Commission's concurrence that the proposed project is exempt from a Coastal Development Permit pursuant to section II.B.1.c. of the *Repair, Maintenance and Utility Hook-up Exclusions from Permit Requirements* (adopted by the Commission on September 5, 1978), which specifically includes performing necessary maintenance work to gas injection and withdrawal wells.

Filing Fee

Please find enclosed, check number 2270209 made out to the Commission in the amount of \$353.

SoCalGas appreciates your review and consideration of this exemption request. Should you have any questions or require additional information, please do not hesitate to contact me at (213) 231-6230 or aklecha@socalgas.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony A. Klecha', followed by a horizontal line extending to the right.

Anthony A. Klecha
Team Lead, Planning & Project Support, Environmental Services Department
Southern California Gas Company

Attachments: Application for Written Exemption
Appendix A - Well Relocation Site (Site 1)
Appendix B - Plan Drawings
Appendix C - Aquatic Resources Delineation Report
Filing Fee (check no. 2270209)

cc: Tom McMahon, Director, Underground Storage, SoCalGas
Todd Van de Putte, Drilling Manager, SoCalGas
Charles Jackle, Sr. Storage Field Engineer, SoCalGas

Application for Written Exemption

SoCalGas' Del Rey 14, 17 & 19 and Vidor 15 Plug and Abandonment Project

February 13, 2023

1. Name, mailing address, telephone number of all applicants/owners:

Southern California Gas Company (SoCalGas)
Attn: Charles Jackle
(310) 578-2693
8141 Gulana Ave., Playa del Rey, CA 90291

2. Name, mailing address, telephone number of applicant's representative:

SoCalGas Environmental Services
Attn: Anthony Klecha
(213) 393-0568
555 W. 5th Street, ML GT02A, Los Angeles, CA 90013

3. Project Location (address & APN):

DR-14 APN: 4211-016-900, Lat: 33.971272; Long: -118.443156
DR-17 APN: 4211-016-800, Lat: 33.971819; Long: -118.445253
DR-19 APN: 4211-016-803, Lat: 33.969655; Long: -118.443824
V-15 APN: 4211-014-901, Lat: 33.966274; Long: -118.438707

4. Project Description (include detailed description of the proposed development, including existing and proposed square footage, and existing and proposed height, as applicable – attach additional sheets if needed):

SoCalGas proposes to perform a complete plug and abandonment of four (4) of its existing wells: DR-14, 17 & 19 and V-15 at its Playa del Rey Natural Gas Storage Facility. The process of abandoning each well would include bringing in a workover rig to remove the downhole piping, setting cement plugs to isolate the hydrocarbon and fresh-water bearing zones, removing the wellhead, cutting the well casing, then capping the well approximately five feet (5') below grade. All concrete cellar material, exposed piping, and rig anchors would be removed. DR-19 will require a replacement well redrilled from SoCalGas' property, outside of the coastal zone. Please refer to the cover letter for additional information.

5. Project Plans: Include two (2) sets of proposed project drawings (site plan, floor plan, and other plans as necessary). Drawings must be to scale with dimensions shown. All oak trees and riparian vegetation (canopy), streams and drainages, wetlands, easement, and public hiking and equestrian trails (including existing offers to dedicate trails) must be identified on the site plan.
[Enclosed.](#)

6. Permit History: Has any application for development on this site including any subdivision been submitted previously to the Coastal Commission? If yes, state previous application number(s), date, and brief description.

[No prior applications have been submitted to the Coastal Commission for these wells.](#)

7. **Structures Destroyed by Disaster.** If the proposed development is the replacement of a structure(s) destroyed due to disaster, please include copies of previous building or site plans, if available, to indicate the location, size and height of structure(s). Other potential information that can be used to demonstrate the size and location of structures includes, but is not limited to, photos of the property, surveys showing foundation(s), building permits, and assessor's records.

[These wells have not been destroyed by disaster.](#)

8. **Filing Fee.** Per the application fee schedule (effective July 1, 2022), the filing fee for an exemption determination is \$353.00

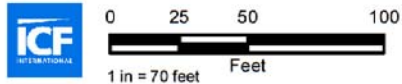
[Enclosed.](#)

APPENDIX A
Well Relocation Site (Site 1)



Figure 3
Local Vicinity Map
SoCal Gas Potential Well Sites, Playa del Rey

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**Figure 4a: Sites 1 & 2
Jurisdictional Delineation Results
SoCal Gas Potential Well Sites, Playa del Rey**



Photograph # 1
Photo Date 12/2/13
Location Site 1
Direction East
Comment Gravel storage yard



Photograph # 2
Photo Date 12/2/13
Location Site 1
Direction West
Comment Gravel storage yard

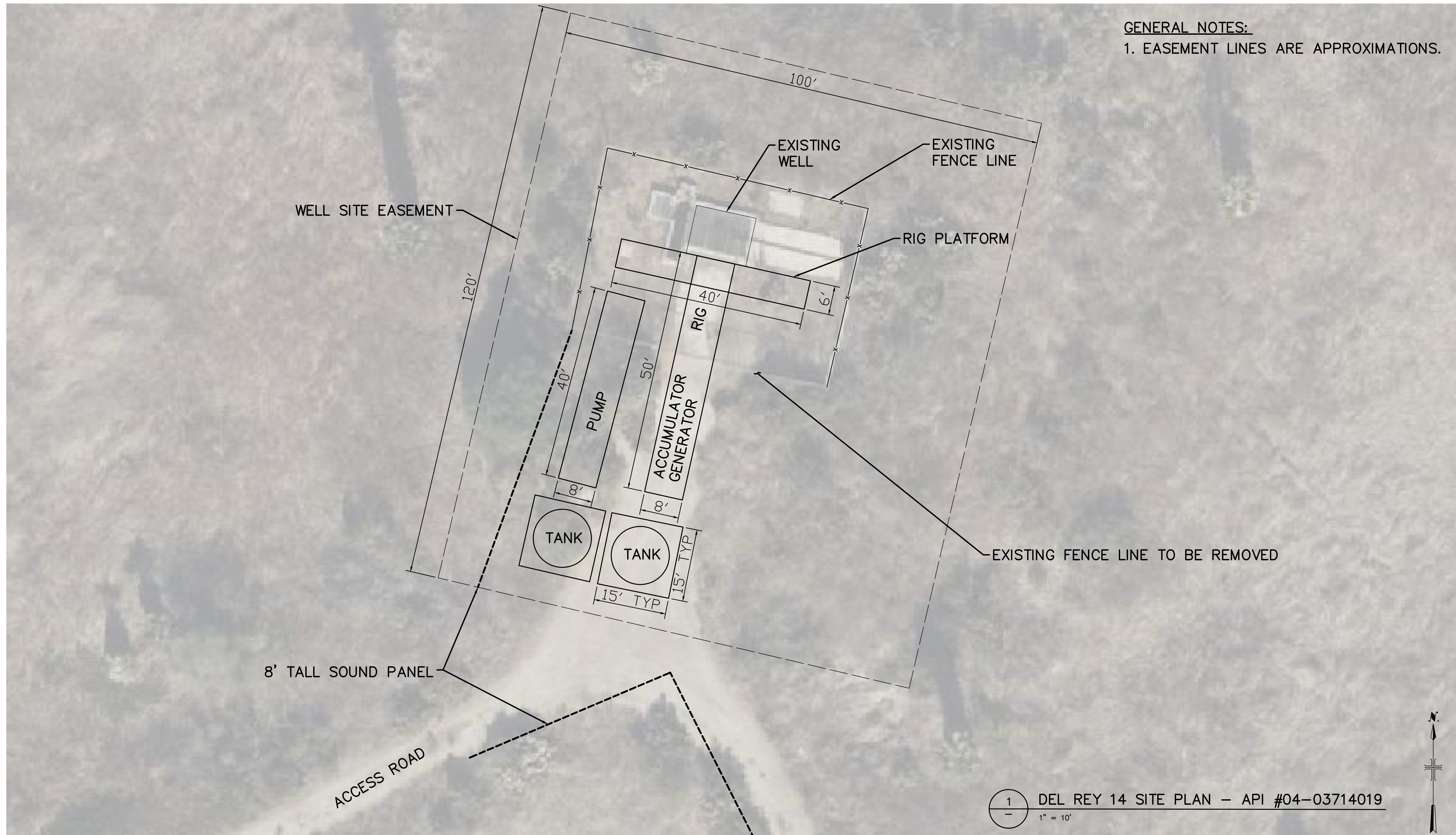


Photograph # 3
Photo Date 12/2/13
Location Site 1
Direction Southwest
Comment Open area

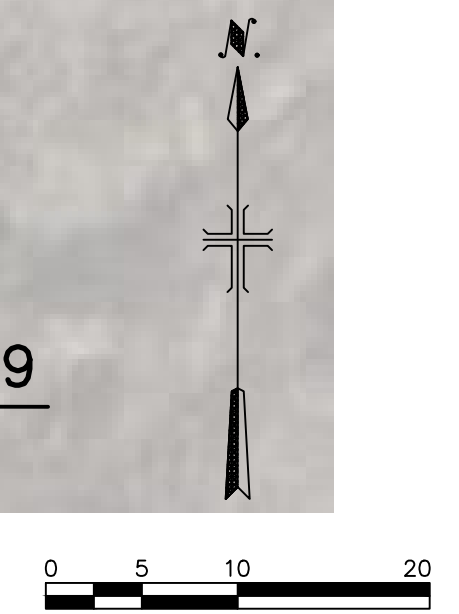
APPENDIX B
Plan Drawings

P:\Project_Folders\SC0766_SCG Playa Del Rey\CAD\Drawings\Well Abandonments\Vidor & DR SCG PDR 2021-11\SCG - DETAIL DRAWINGS 20211210.dwg
 January 07, 2022 - 1:36pm MChunheim

GENERAL NOTES:
 1. EASEMENT LINES ARE APPROXIMATIONS.



1 DEL REY 14 SITE PLAN - API #04-03714019
 1" = 10'



REV	DATE	BY	CHK	APP	DESCRIPTION

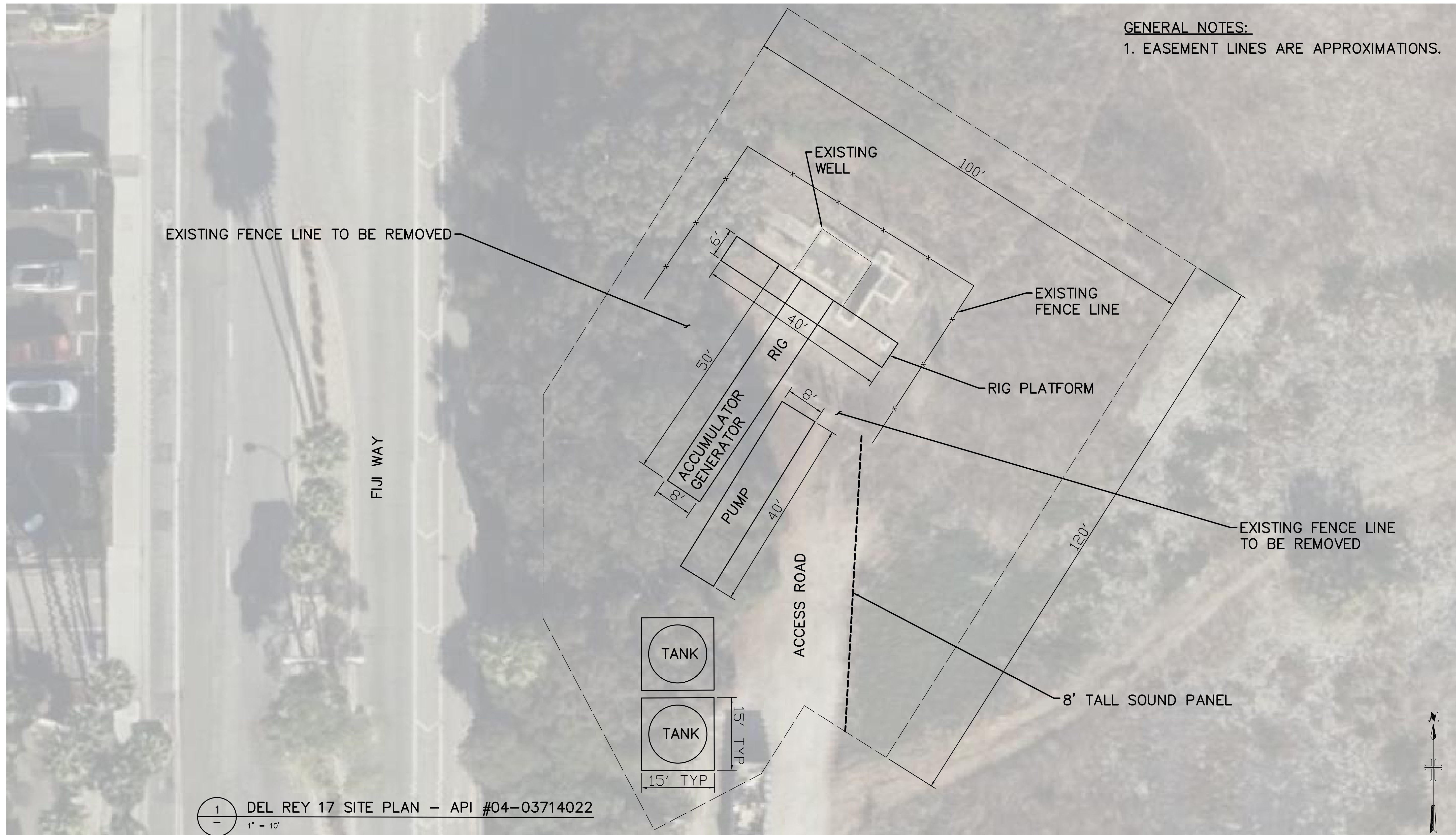
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APPROVED BY	
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DEL REY 14 PLUG AND
 ABANDONMENT PROJECT: SITE PLAN
 PLAYA DEL REY, CA

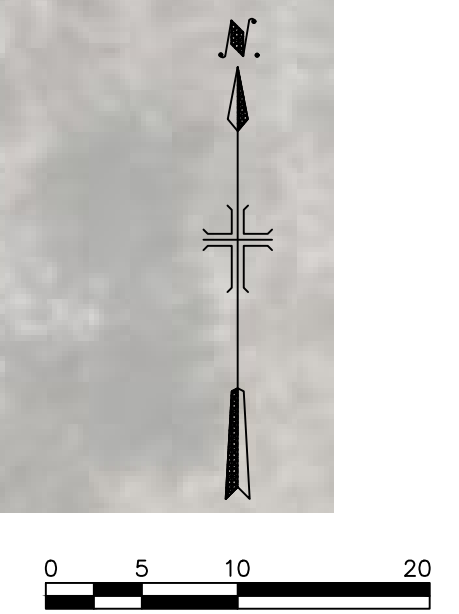
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DRAWING NO.	C-07
SCALE	1" = 10'
SHEET NO.	7 OF 8

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 January 07, 2022 - 1:36pm MChunheim



GENERAL NOTES:
 1. EASEMENT LINES ARE APPROXIMATIONS.

1 DEL REY 17 SITE PLAN - API #04-03714022
 1" = 10'



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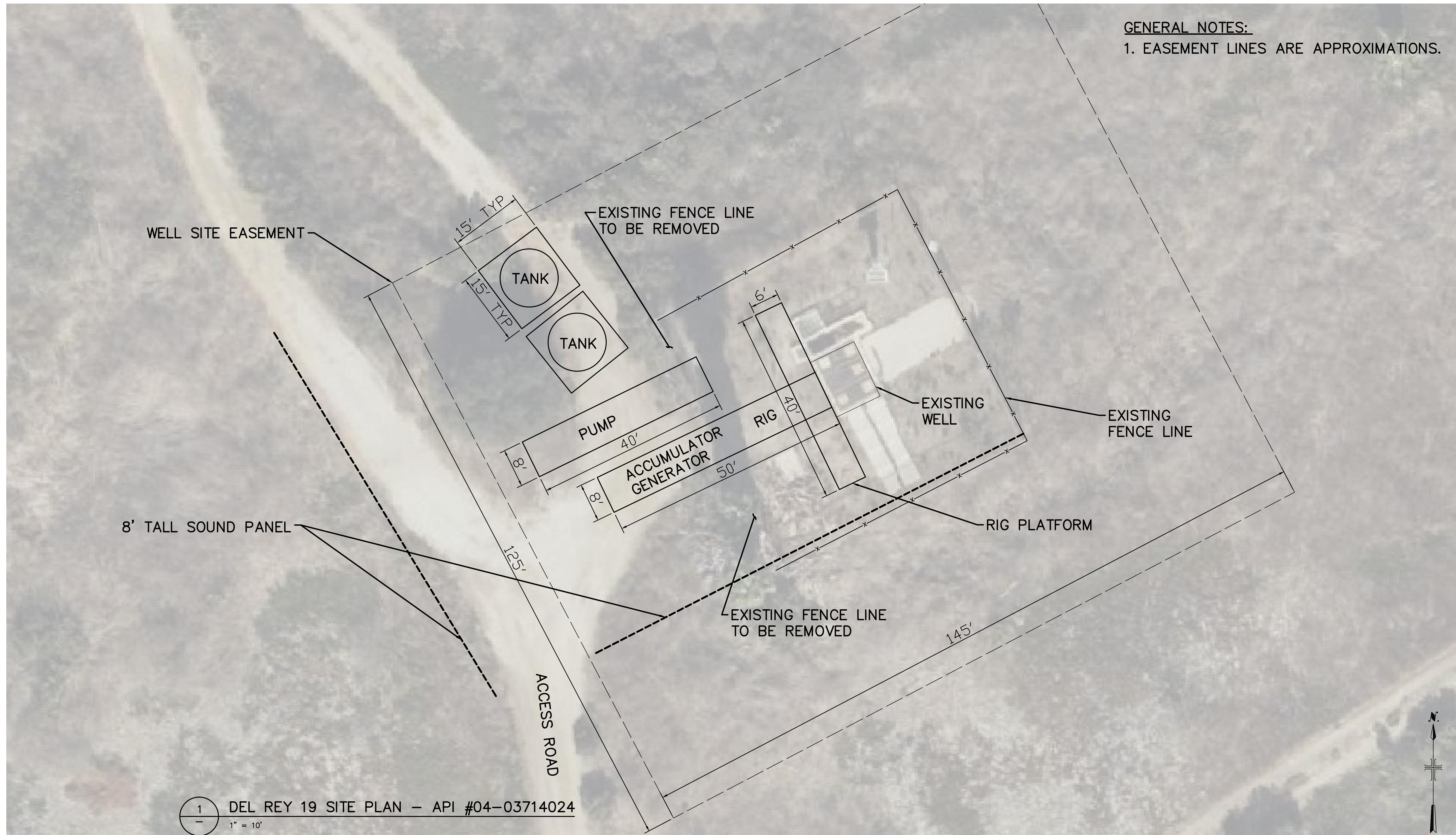
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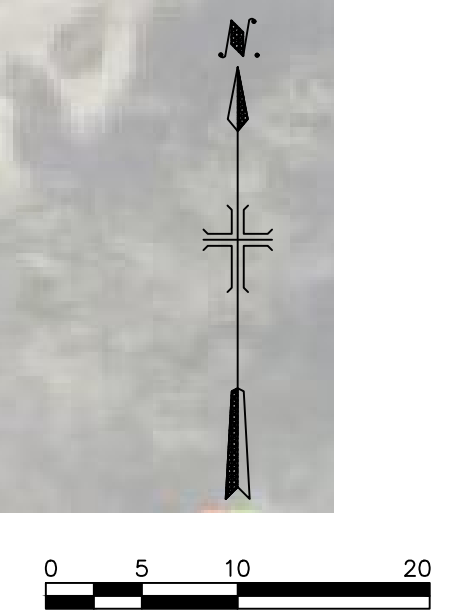
DEL REY 17 PLUG AND
 ABANDONMENT PROJECT: SITE PLAN
 PLAYA DEL REY, CA

JOB NO.	
DRAWING NO.	C-08
SCALE	1" = 10'
SHEET NO.	8 OF 8

GENERAL NOTES:
 1. EASEMENT LINES ARE APPROXIMATIONS.



1 DEL REY 19 SITE PLAN — API #04-03714024
 1" = 10'



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 January 07, 2022 - 1:36pm MChunheim

DESIGNED BY	
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CHECKED BY	
APPROVED BY	
DATE	

REV	DATE	BY	CHK	APP	DESCRIPTION

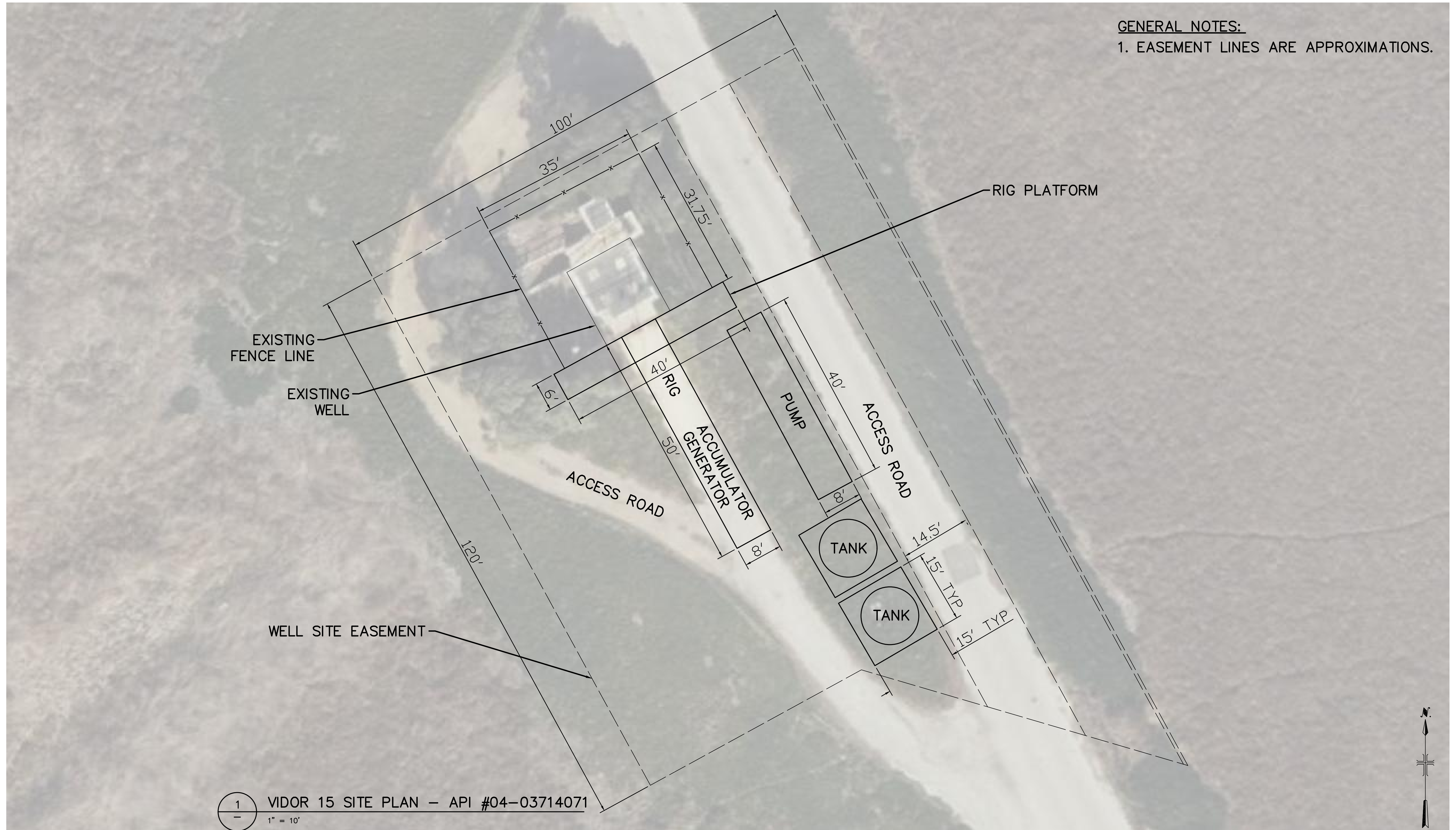
Geosyntec consultants
 engineers | scientists | innovators

SoCalGas
 A Sempra Energy utility

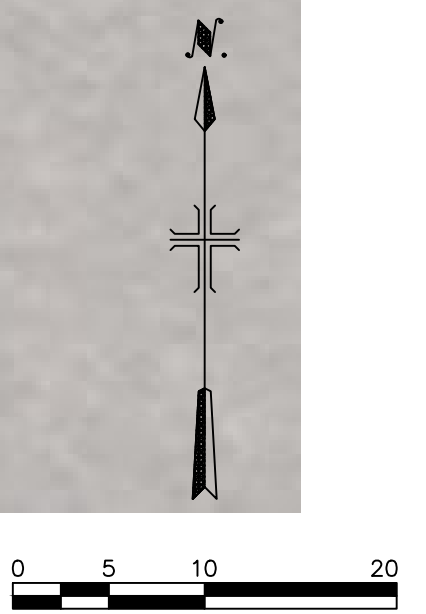
DEL REY 19 PLUG AND
 ABANDONMENT PROJECT: SITE PLAN
 PLAYA DEL REY, CA

JOB NO.	
DRAWING NO.	C-05
SCALE	1" = 10'
SHEET NO.	5 OF 8

GENERAL NOTES:
 1. EASEMENT LINES ARE APPROXIMATIONS.



1 VIDOR 15 SITE PLAN - API #04-03714071
 1" = 10'



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REV	DATE	BY	CHK	APP	DESCRIPTION

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APPROVED BY	
DATE	



VIDOR 15 PLUG AND ABANDONMENT
 PROJECT: SITE PLAN
 PLAYA DEL REY, CA

JOB NO.	
DRAWING NO.	C-04
SCALE	1" = 10'
SHEET NO.	4 OF 8



A Sempra Energy utility

P.O. Box 30777 Los Angeles, CA 90030-0777

ACCOUNTS PAYABLE

Wells Fargo
Minneapolis, MN 55479

N9301-0
1

VENDOR NO	CHECK NO	DATE	AMOUNT
94662	2270209	02/09/23	*****\$353.00

PAY: THREE HUNDRED FIFTY-THREE USD

TO THE ORDER OF: CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
200 OCEANGATE 10TH FLOOR
LONG BEACH CA 90802-4416

Mia De Mentore

VOID AFTER SIX MONTHS

THE BACK OF THIS DOCUMENT HAS A WATERMARK - HOLD AT ANGLE TO VIEW

⑈02270209⑈ ⑆061209756⑆ 2079900420230⑈



A Sempra Energy utility

P.O. Box 30777 Los Angeles, CA 90030-0777

PLEASE RETAIN THIS STATEMENT FOR YOUR RECORDS

ACCOUNTS PAYABLE

NAME	Vendor No	Check No	Date	Amount
CALIFORNIA COASTAL COMMISSION	94662	2270209	02/09/23	*****\$353.00

YOUR REFERENCE				VOUCHER	GROSS DISCOUNT	AMOUNT PAID
	DATE	PO	ITEM			

020123-EXP FEE	02/01/23			1901566656	353.00	0.00	353.00
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EXHIBIT B



Any Questions? Contact:
STAFF CAELAN RAFFERTY
TELEPHONE (213) 978-1197

NOTICE OF PUBLIC HEARING

Case Number DIR-2024-1588-CDP

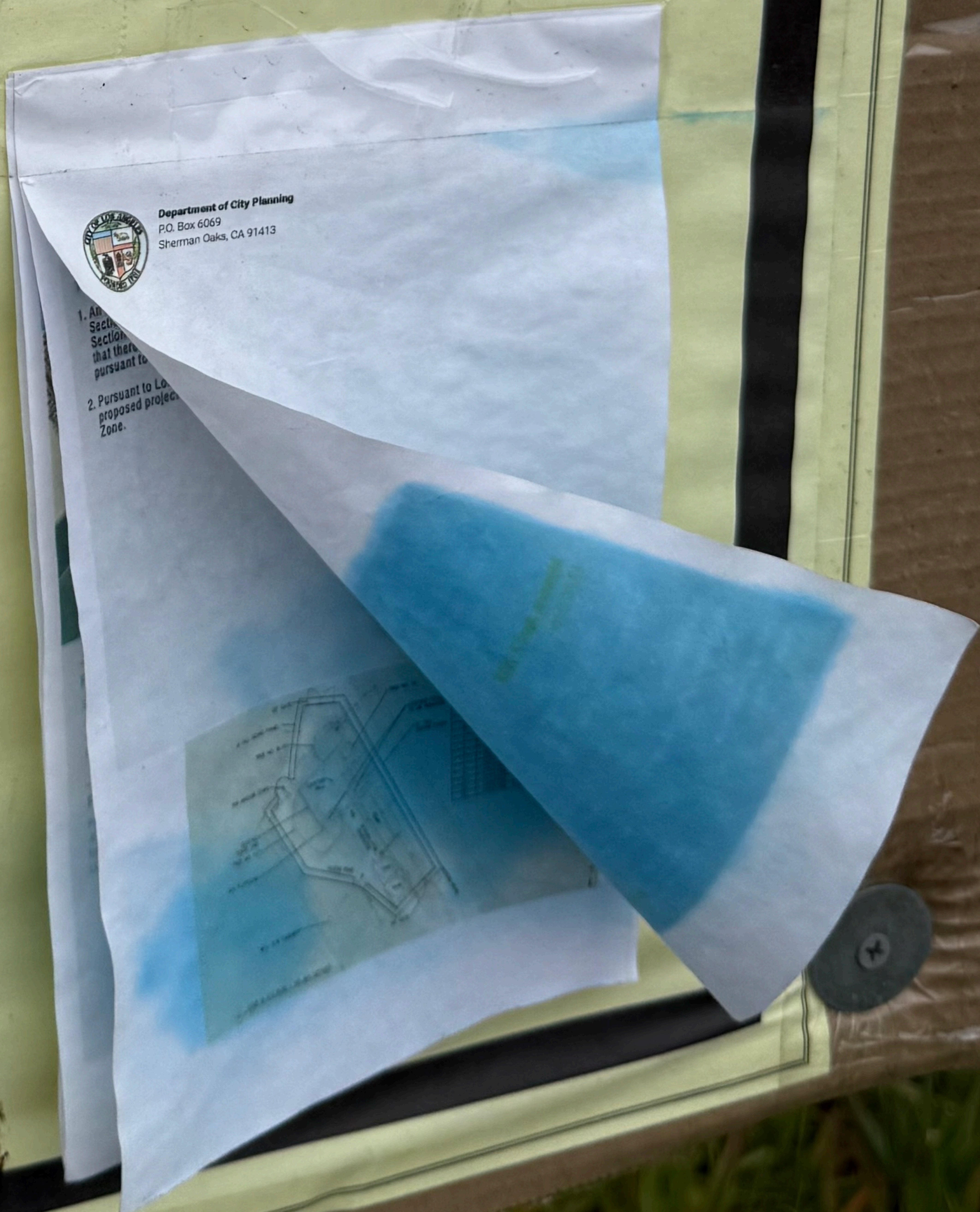
WHAT is proposed? THE PLUGGING
AND ABANDONMENT OF WELL
VIDOR 15

WHEN and WHERE? APRIL 7, 2025

12:00 PM. BY PHONE: (669)

900-9128 OR (213) 338-8477

For further information ...
contact the staff person listed in the
upper right hand corner of this notice.
Written communication is encouraged,
use Reference Number,
Send to: CAELAN RAFFERTY



California Coastal Commission

Re: Comments for Staff Report and Request to Speak
Application 9-23-0818
ITEM No.7 April 11, 2025

4/4/25

I request the Commission Deny or Continue this hearing. The Staff Report is insufficient for the Commission to make a fully-informed decision on this extremely hazardous project due to errors of omission and commission in the Staff Report. The proposed project is in overt non-compliance with the Coastal Act. The Commission does not have the information it needs to make a fully informed decision consistent with provisions of Chapter Three of the Coastal Act.

SUGGESTED MOTION:

I move the Commission continue the hearing until sufficient information is provided to confirm the project is in full conformance with the California Coastal Act.

The Commission Should Continue the Hearing Because:

I. FALSE PURPOSE FOR PROJECT IS CLAIMED BY STAFF REPORT

The Staff Report cites to a demonstrably false purpose that drives this project. Coastal Commission Staff claims that California Department of Fish and Wildlife (CDFW) Ballona Wetlands Restoration Project (BWRP) is “*pending*”.

“The Reserve area is part of the pending Ballona Wetlands Restoration Project proposed by the California Department of Fish and Wildlife (CDFW)...”

(JUDICIAL REVIEW)

On July 13, 2023, the Los Angeles Superior Court entered judgement against CDFW in a challenge to the legal adequacy of the FEIR under CEQA.

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IT IS HEREBY ADJUDGED, ORDERED AND DECREED THAT:

1. Judgment shall be entered in favor of Petitioner in this proceeding.
2. A peremptory writ of mandate directed to Respondent California Department of Fish and Wildlife shall issue under seal of this Court, which shall direct Respondent to:
 - i. Decertify the Environmental Impact Report for the Project entitled “Ballona Wetlands Restoration Project” adopted on December 30, 2020, State Clearinghouse Number: 2012071090;
 - ii. Rescind the Project’s CEQA Findings;
 - iv. Invalidate all approvals of the Project;
 - v. Prepare and certify a legally-adequate Environmental Impact Report if it chooses to proceed;
 - vi. Suspend any activity that could result in an adverse change or alteration to the physical environment until Respondent fully complies with the requirements of CEQA;
 - vii. Notify, in writing, all Responsible Agencies that have relied on the Environmental Impact Report to implement the Project that the Environmental Impact Report has been decertified;

The Ballona Wetlands Restoration Plan is dead. It is no longer pending. The FEIR is legally extinguished. The Staff Report concealed the courts judgement from the Coastal Commission in a purposeful error of omission intended to prejudice the Commission’s decision to a predetermined outcome.

Staff was unquestionably aware of this judgement, yet it withheld it from the eyes of this Commission and the public. Had this document been included in the Staff Report, the false purpose of this project would have been exposed to the detriment of the applicant.

The CDFW Ballona Wetlands Restoration Plan (BWRP) is not pending and will certainly not recover. To support the false premise of a “*pending*” project the Staff Report makes a second false claim:

“...SoCalGas” well abandonment activities...would directly support goals of the Ballona Wetlands Restoration Project.”

There are no BWRP goals to support currently. It is an impossibility that the SoCal Gas Application 9-23-0818 will support the goals of the BWRP which was found to be unlawful.

Furthermore, the Staff Report cherry-picked language to support the project and concealed even more information from this Commission to prejudice its decision. It is true the U.S. Army Corp of Engineers and Los Angeles Department of Public Works were initially involved with the project. Both agencies withdrew involvement because the CDFW BWRP did not and could not comply with State of California and Federal Statutes.

The proposed well abandonments only represent fulfillment of an extinct plan that no longer has support from any of the previous agencies engaged. CDFW has yet to put forth an alternative plan, therefore SCG's utilization of the former CDFW plan as reasoning for the abandonments is specious and without merit.

No valid purpose for this project is cited by the Staff Report.

It is my belief the Staff Report errors of omission are not the result of incompetence, but instead represents willful misconduct intended to blind this Commission of facts it needs to make a fully informed decision on the matter.

(CALIFORNIA COASTAL CONSERVENCY INVOLVEMENT)

The proposed BWRP is not pending. On January 23, 2024, Coastal Conservancy Executive Officer Amy Hutzler signed the Rescission of CEQA Findings Related to the BWRP.



Rescission of CEQA Findings Related to the Ballona Wetlands Restoration Project


On December 30, 2020, the California Department of Fish and Wildlife ("CDFW") certified a final Environmental Impact Report ("EIR") under the California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq.*; "CEQA") for the Ballona Wetlands Restoration Project ("Project"), and made CEQA findings as the lead agency regarding the Project and the EIR.

On May 27, 2021, the State Coastal Conservancy ("Conservancy") made CEQA findings as a responsible agency regarding the Project and the EIR.

On July 13, 2023, the Los Angeles Superior Court entered judgment against CDFW in a challenge to the legal adequacy of the EIR under CEQA.

On September 28, 2023, in compliance with the court judgment, CDFW decertified the EIR and rescinded its CEQA findings regarding the Project, among other actions.

In recognition of the CDFW's decertification of the EIR and rescission of its CEQA findings for the Project, the Conservancy hereby also rescinds its May 27, 2021 CEQA findings regarding the Project.



Amy Hutzler
Executive Officer

1/23/24

Date

CDFW BWRP BACKGROUND

The Department of Fish and Wildlife promoted the BWRP. The project was intended to construct a flood control basin at public expense for the private Playa Vista Project outside the Coastal Zone.

The failed BWRP was to be located inside the Coastal Zone in the publicly owned Ballona Ecological Reserve.

The Coastal Commission approved two of three interdependent Permits for a Playa Vista flood control system. However, Playa Vista failed to obtain the third interdependent permit for the required flood control basin.

The Playa Vista Project installed a system of surface drains in the Ballona Wetlands before the land was deeded to the public and managed by CDFW. The drains were intended to drain surface water when it ponded from rainstorms and to then claim the wetlands were degraded and with diminished value.

These unlawful actions were taken to support construction of a flood control basin.

Grassroots Coalition informed Coastal Commission Enforcement Staff of this unlawful activity. Enforcement Staff requested CDFW to cease the illegal draining of the wetlands. CDFW failed to comply with Enforcement Staff's request to remove artificial drains placed on the surface of the wetlands.

Grassroots Coalition took legal action against the Playa Vista Project and CDFW to prevent violations of the Coastal Act. A settlement agreement was reached, and the Coastal Commission supported the settlement ordering the illegal drains to be capped and removed.

SUMMARY OF INVALID PURPOSE

The BWRP was infeasible from the beginning and cost the public millions of dollars, with nothing to show. The Staff Report cites to a purpose for the current well abandonment project that is inaccurate. There is no pending BWRP, goals of the BWRP cannot be supported, and the USACE and LACDPW withdrew all support from the project.

There is no valid purpose to abandon the functional and important monitoring wells. To do so would endanger public safety.

- II. The Staff Report admits there is no analysis of sub-surface conformance with the Act. The project is sub-surface and does require a conformance analysis.
- III. The Staff Report cites no valid reason or urgency to abandon these wells. The existing wells are carrying out their intended monitoring function. The proponent has acknowledged the need for replacement wells in the future. Even if such wells were drilled there will be a period where no monitoring is possible, placing the health and safety of the public at risk.
- IV. The Staff Report lacks a public health and safety analysis for the project. The proposed project is in a highly pressurized gas field with a history of leaking of dangerous volatile greenhouse gases to the surface. The sour-oilfield field also produces and leaks deadly Hydrogen Sulfide. The gas is heavier than air. It creeps into buildings along the ground concentrating in parking garages and elevator shafts.

- V. There is no recent analysis of the historical subsidence of the field in the Staff Report.
- VI. The Staff report is absent a hydrological analysis of the potential adverse effects on surface and groundwater resources. Furthermore, the project may be inconsistent with the stated public goals of the California Groundwater Sustainability Act.
- VII. The Staff Report does not contain a cumulatively analysis.
- VIII. Approval of this application may prejudice ongoing efforts to decommission the hazardous underground gas field. Unlike the Aliso Canyon gas field, it is far more dangerous because it lies underneath residential development inside and adjacent to the coastal zone. The proposed activity inside the zone may also cause adverse effects outside the zone .
- IX. The project represents unlawful piecemealing.
- X. The project may prejudice plans for the Ballona Ecological Reserve that do not include abandonment of these important monitoring wells.

The good news is a new and comprehensive plan is emerging. It combines decommissioning the hazardous underground gas storage facility while recognizing the resiliency of the wetlands to heal naturally. Bulldozers are not required.

The Ballona Resiliency Plan is being crafted by collaboration of non-profit entities, experts, and the public. The public is a partner with the Commission in accordance with Chapter Three provisions of the Coastal Act. Together we can create lasting solutions and settle a decades long debate costing that cost the public millions of dollars with nothing to show. A comprehensive plan to decommission the hazardous gas field while recognizing the resiliency of the wetlands to heal will be created.

The Commission avails itself to workshops for understanding complex issues and one should be convened for the Ballona Wetlands Ecological Reserve. It would assist both the public and Coastal Commission in understanding the cumulative issues presented by the SoCal Gas Application. A clear and accurate understanding of the SoCalGas underground gas storage operations within this oilfield setting is needed.

The health and safety of the public are in your hands today. Your decision will be remembered should disaster strike. I fully support the comments of the Grassroots

Collation in response to the SoCalGas Application 9-23-0818

I request the Commission continue the hearing until sufficient information is provided to confirm the project is in full conformance with the California Coastal Act.

Respectfully Submitted,

John Davis

John@johnanthonydavis.com