

California Public Utilities Commission Mitigation Monitoring, Compliance, and Reporting Program

Central Valley Gas Storage Project

Compliance Status Report 01

April 29, 2011

SUMMARY

The California Public Utility Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the final initial study/mitigated negative declaration (FIS/MND) for the Central Valley Gas Storage (CVGS) project. The CPUC has established a third-party monitoring program and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure that measures approved in the FIS/MND to mitigate or avoid significant impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities on the project, a summary of site inspections conducted by the CPUC's third-party monitors, the compliance status of mitigation measures required by the MMCRP, and anticipated construction activities. This compliance status report covers construction activities for the period of April 11 to April 29, 2011.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor conducted site observations in areas of active construction, which included the 10-acre compressor station, 5-acre remote well pad site, and three observation wells. Site observations were completed on April 13, 21, and 27, 2011. Areas of active and inactive construction within the project limits were observed to verify implementation of the measures stipulated in the project's MMCRP. Daily observations were documented on daily site inspection forms, and applicable mitigation measures were reviewed in the field. Additionally, areas proposed for the 24-inch gas pipeline realignment as presented in Variance Request No.1 were observed to assess potential impacts to environmental resources.

Implementation Actions

<u>Preparation of Compressor Station Site and Remote Well Pad Site</u>

Areas of active construction were limited to grading activities associated with construction of the compressor station site and remote well pad site (see Photo 1 – Attachment A). Prior to construction

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activities, the compressor station and remote well pad sites consisted of fallowed agricultural fields. Site preparation activities consisted of soil excavation, transport of excess fill from the remote well pad site to the compressor station, and compaction of soils to establish the final grade for the pad sites. Crews used scrapers, dozers, and roller compactors to establish the final grade at the pad sites (see Photo 2 – Attachment A).

Fugitive dust emissions were minimal during earthwork activities because a water truck was used to water down access roads (see Photo 3 – Attachment A). Crews have placed best management practices (BMPs) around the perimeter of the work area, consisting of a silt fence to minimize the potential for sediment to be transported beyond the work limits. Silt fences were observed to be maintained throughout the site observations (see Photo 4 – Attachment A). Exclusion fencing has also been placed within areas adjacent to the approved work limits at the discretion of the CVGS biologist to ensure that direct impacts to sensitive habitat do not occur during construction (see Photo 5 – Attachment A). Environmental awareness training has also been provided to all construction personnel. Crews have been issued a hardhat sticker to indicate they have completed environmental awareness training.

Dirt haulers are being used to transport excess soil from the remote well pad site to the compressor station site located to the north via McAusland Road. Dirt haulers were observed to be covering loads, and trackout along access points was being swept at the end of the workday.

Mitigation Measure Tracking

Mitigation measures applicable to the work being conducted in active construction areas were verified in the field.

Note: Impact areas were identified in the FIS/MND (Certification of Public Convenience and Necessity (CPCN) Application A.09-08-008, SCH No. 2010042067) in Sections 5.2 through 5.17. A complete list of mitigation measures can be found at the end of each section. The status of each mitigation measure, including measures applicable to the design and pre-construction phases, is tracked through the project's mitigation measure tracking database and is available upon request.

Compliance

Pre-construction mitigation measures have been completed as indicated in Notice to Proceed (NTP) No. 1 and No. 10A (Attachment B). Applicable mitigation measures were verified during site inspections and were determined to be implemented in accordance with the MMCRP.

CONSTRUCTION PROGRESS

CVGS continues pad site preparation to obtain the final grade at the compressor station site and remote well pad site.

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CONSTRUCTION SCHEDULE

Compressor Station – CVGS began construction on April 11, 2011, and anticipates completion of construction by April 2012.

Remote Well Pad Site (includes saltwater tank) – CVGS began construction on April 11, 2011, and anticipates completion of construction by December 2011.

Observation Well Conversions – CVGS anticipates starting construction on April 25 and completing construction by October 2011.

Saltwater Disposal Well – CVGS anticipates starting construction on May 13 and completing construction by December 2011.

Metering Station – CVGS anticipates starting construction on June 1 and completing construction by August 2011.

Natural Gas Connecting Pipeline (Segment A) – CVGS anticipates starting construction on July 1 and completing construction by January 2012. Preparation of the Natural Gas Connecting Pipeline (Segment A) right-of-way is expected to begin on April 18 and to be completed by June 2011.

Natural Gas Connecting Pipeline (Segment B) – CVGS anticipates starting construction on July 11 and completing construction by October 2011.

Line 172 Connection Pipeline – CVGS anticipates starting construction on May 13 and completing construction by December 2011.

DUDEK

ATTACHMENT A Photos



Photo 1: Construction crews complete soil compaction activities at the compressor-station pad site to obtain final grade. Fugitive dust emissions were minimal during grading activities.



Photo 2: Crews complete grading activities at the remote well pad site to obtain final grade.

ATTACHMENT A (Continued)



Photo 3: A water truck is used to water down access roads to minimize fugitive dust emissions during construction.



Photo 4: Silt fencing has been placed along the perimeter of the grading activities to minimize the potential for sediment to be discharged beyond the work limits.

ATTACHMENT A (Continued)



Photo 5: Environmental exclusion fencing is placed along the approved work limits to minimize impacts to sensitive resources during construction.

ATTACHMENT B Notices to Proceed

NTP No.	Date Issued	Segment/Component	Conditions Included (Y/N)
1	March 21, 2011	Compressor Station, Remote Well Pad, and Observation Wells	Υ
10A	April 18, 2011	Berm Installation for Preparation of Natural Gas Pipeline Right-of-Way	Υ

ATTACHMENT C Variance Requests

Variance Request #	Submitted	Description	Status	Approval
1	April 6, 2011	Realignment of the 24-inch gas pipeline, including the Southam Pipeline, Weller Pipeline, and Perez Pipeline will be performed. The intent of realignment is to minimize impacts to irrigation systems and agricultural lands.	Approved	April 25, 2011