
Attachment 2
Devil's Canyon Road Site Response

VENTURA COMPRESSOR STATION MODERNIZATION PROJECT
(A.23-08-019)
SOCALGAS
CPUC – CEQA AND ENERGY PERMITTING
(Data Request 001)
DATE REQUESTED: January 21, 2025
RESPONSE SUBMITTED: October 17, 2025

The following questions pertain to the three site alternatives to the proposed Ventura Compressor Station Modernization Project (VCM Project) considered in the Proponent’s Environmental Assessment (PEA) Section 6, Comparison of Alternatives.

The three site alternatives identified by SoCalGas® are as follows:

- Avocado Site
- Devil’s Canyon Road Site
- Ventura Steel Site

The responses in this attachment address the Devil’s Canyon Road Site Alternative only. Please refer to Attachment 1 for responses related to the Avocado Site and Attachment 3 for responses related to the Ventura Steel Site.

SoCalGas’s General Approach for Devil’s Canyon Road Site Alternative

SoCalGas’s proposed approach included the following steps to respond to this data request and perform the required preliminary engineering design and environmental assessment:

- Developing the responses and designs using insights derived exclusively from desktop-level analysis.
- Utilizing publicly available information from city, county, and state records.
- Using geographic information system (GIS) software to generate data reports that may include information such as potential utility conflicts, geotechnical information, constructability, and pipeline routing options to and from each alternative site.
- Taking photos from publicly accessible areas or from land with SoCalGas access rights to assess site conditions.¹
- Using engineering data from previous Front End Engineering Design (FEED), which is not anticipated to change at the three site alternatives and includes the compressor building, office and warehouse building and perimeter fencing security features. Any additional preliminary engineering developed to address this data request is approximately at a 5 percent engineering level, while the VCM Project has been developed at an approximately 15 percent engineering level.

¹ No actual aerial or field survey was performed for alternative sites for both on-site and off-site infrastructure since SoCalGas does not own any of the proposed alternative sites and would require property owners/operators to provide access to their property. Likewise, ground-penetrating radar (GPR) surveys have not been performed to locate existing underground utilities, pipes, and other potential obstructions at the alternative sites for both on-site and off-site infrastructure.

- Assuming the Commission preempts local zoning regulations, ordinances, codes, and requirements, and that any such discretionary permits that would otherwise be required to implement the project are preempted.

All identified features and proposed infrastructure presented in engineering drawings will be subject to validation in the subsequent phases of the project, once a final decision is made by the California Public Utilities Commission (CPUC). Using preliminary engineering design, SoCalGas has provided the information requested on the environmental conditions to support the comparative analysis of the potential effects for each alternative.

2.1 General Information About Site Alternatives

Please provide PEA-level information for each of the three site alternatives.

The Devil’s Canyon Road Site is located approximately 5,300 feet north of the existing Ventura Compressor Station property, on the west side of Highway 33 in the County of Ventura. The Devil’s Canyon Road Site itself is relatively flat and within an active existing oilfield operation with substantial well infrastructure that would impact the site development.

Site access from the highway is provided by the existing Devil’s Canyon Road and Bridge that crosses the Ventura River and would require paving of unpaved areas. Considering that there is an active oil operation at this site, it is assumed that existing water and sanitary sewer systems are available along Devil’s Canyon Road that the site can connect and tie into. The nearest electrical interconnection is through an existing Southern California Edison (SCE) Grandad 16 kilovolt circuit.

The Devils Canyon Road Site Alternative consists of (1) installing two new 1,900 horsepower (HP) natural gas compressors and two new 2,500 nominal HP electric compressors, (2) erecting a new 10,458-square-foot compressor building; (3) erecting a new 4,641-square-foot-permanent office building; (4) erecting a new 5,459-square-foot warehouse; (5) installing a new 8-foot-tall perimeter block wall; (6) installing 2.8 miles of new gas pipeline system along Devil’s Canyon Road and Cable Canyon Road that would tie into the existing natural gas system pipelines; (7) installing new water and sewer lines that would tie into the existing facilities at Devils Canyon Road; and (8) installing approximately 34 new electrical poles between the tie-in to the existing SCE Grandad circuit and the tie-in at the proposed compressor station.

The Devil’s Canyon Road Site Alternative would require the demolition of existing oilfield infrastructure, as well as the abandonment of oil wells within the proposed facility boundary and along the proposed new pipeline corridor.

For each of the site alternatives, please provide additional details and maps identifying the necessary site features and off-site infrastructure, as follows (see Responses to Sections 2.1.1–2.1.5):

2.1.1 Permanent and temporary disturbance area boundaries, and any extra work areas (e.g., staging or parking areas), identified with GIS data and maps, consistent with PEA Checklist requirements.

RESPONSE

The permanent disturbance area for both on-site and off-site infrastructure is about 75.8 acres. The temporary disturbance area, which only applies to off-site infrastructure, is about 6.3 acres. These values are approximations based on conceptual engineering and would need to be validated and updated in later phases of design.

The permanent and temporary disturbance area boundaries can be viewed on the Devil’s Canyon Road Site Drawing 152084-7027-D-SKT, Conceptual Limits of Disturbance, or using the Limits of Disturbance KMZ/GIS Files. The Conceptual Limits of Disturbance drawing outlines the boundaries of both permanent and temporary disturbance areas. Permanent disturbance areas, shown in blue on the drawing, encompass grading for the project site and associated off-site infrastructure, including gas pipelines, water line, wastewater line, electrical interconnect, and access road. Temporary disturbance areas, shown in green on the drawing, represent construction staging areas and personnel parking areas. Workers would be shuttled to and from the staging area located northwest of the intersection of Shell Road and Ventura River Trail.

Please refer to Appendix 2-A for a PDF of Devil’s Canyon Road Site Drawing 152084-7027-D-SKT and Attachment 2-A for KMZ and SHP files.

2.1.2 Electric interconnections and modifications to existing electric distribution facilities.

RESPONSE

The proposed facility on the Devil’s Canyon Road Site would receive power from the existing SCE Grandad circuit and was based on a preliminary study conducted by SCE. Using this study, a preliminary route was developed that would entail the installation of 34 new electrical poles and an 8,200-foot-long alignment along Taylor Ranch Road and Devil’s Canyon Road to deliver power to the Devil’s Canyon Road Site. Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan, shows the proposed electrical interconnect alignment, pole types, and assumed tie-in location to the existing SCE Grandad circuit. Devil’s Canyon Road Site Drawing 152084-5510-D-SKT, Electrical Distribution Interconnect Preliminary Details, shows details of each pole type, pole anchor and hole depths, and pole limit of disturbance. Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, Conceptual Plot Plan, shows the on-site connection point for the electrical line to the switchgear and metering panel.

Based on the preliminary SCE Engineering Analysis Report (Appendix 2-B), SCE is currently progressing on making substation upgrades to the existing electrical system to improve reliability and at this time, SCE does not anticipate any modifications to its distribution system to serve the requested load at the Devil’s Canyon Road Site.

Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-7024-D-SKT, 152084-5510-D-SKT, and 152084-3002-D-SKT, the Conceptual Pipeline & Utility Plan, Devil’s Canyon Road Site Electrical Distribution Interconnect Preliminary Details, and Devil’s Canyon Road Site Plot Plan, respectively. Refer to Appendix 2-B for the electrical interconnections detailed in the SCE Engineering Analysis Report for the Devil’s Canyon Road Site.

2.1.3 Natural gas transmission system pipeline modifications

RESPONSE

The proposed facility at the Devil’s Canyon Road Site would require new natural gas transmission pipelines, which includes two suction and two discharge pipelines at 20 inches in diameter each, with a total length of approximately 5.6 miles of new pipeline, which would tie into the existing main transmission pipelines. One set of suction and discharge pipelines would run through Devil’s Canyon Road. A second set of suction and discharge pipelines would run through Cable Canyon Road. See Devil’s Canyon Road Drawing 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan for the pipeline alignment details. Devil’s Canyon Road Site Drawing 152084-7722-D-SKT, Two Gas Pipelines Corridor Detail, details a section cut of a typical two-gas-pipeline trench, including bedding, backfill, and surface recommendations.

Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-7024-D-SKT and 152084-7722-D-SKT, which detail the natural gas transmission system pipeline modifications for the Devil’s Canyon Road Site.

2.1.4 Other utilities, such as water and wastewater.

RESPONSE

The Devil’s Canyon Road Site is located within an oil processing operation. Based on available site photos taken in January 2022, an existing water main line was identified near the east end of the Mill Canyon Road bridge that crosses the Ventura River. It is assumed that the Devil’s Canyon Road Site would connect to this water main line. A new 6-inch water main is proposed from the roadway intersection to the site. At this point, there is not enough information to determine if the available flow rate and pressure is sufficient for fire protection requirements. Therefore, a water storage tank is proposed to be installed to provide sufficient water volume for fire protection requirements, pending further evaluations of the existing water infrastructure. Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Pipeline & Utility Plan, shows the water line alignment and assumed tie-in location. Devil’s Canyon Road Site Drawing 152084-7121-D-SKT, Conceptual Road & Utility Trench Details sheet, detail 1, shows a section cut of a typical water trench detail, including bedding, backfill, and surface recommendations.

It is assumed the facility would connect to an existing sanitary sewer main along Devil’s Canyon Road. Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Pipeline & Utility Plan, details the wastewater (sewer) line alignment and assumed tie-in location. Devil’s Canyon Road Site 152084-7121-D-SKT, Conceptual Road & Utility Details sheet, detail 2, shows a section cut of a typical wastewater line trench detail, including bedding, backfill, and surface recommendations.

Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-7024-D-SKT and 152084-7121-D-SKT, which detail the utilities plan for the Devil’s Canyon Road Site.

2.1.5 Access road improvements, including paving.

RESPONSE

The existing paved road would remain as the main access to the site. A new access road for Aera Energy operations would be built to relocate a section of the existing Devil’s Canyon Road as this road runs through the middle of the Devil’s Canyon Road Site. Devil’s Canyon Road Site Drawing 152084-7021-D-SKT, Conceptual Overall Surfacing Plan, shows the existing access road and the relocated Devil’s Canyon Road. Devil’s Canyon Road Site Drawing 152084-7022-D-SKT, Conceptual Site Surfacing Plan, shows the site paving details. Devil’s Canyon Road Site Drawing 152084-7121-D-SKT, detail 3, Road & Utility Trench Details, shows a typical road section cut.

Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-7021-D-SKT, 152084-7022-D-SKT, and 152084-7121-D-SKT, which provide site paving details for the Devil’s Canyon Road Site.

For each of the site alternatives, please confirm whether the following proposed “site improvements” would need to be included (see Responses to Sections 2.1.6–2.1.11):

2.1.6 Power Distribution Center (PDC) Building (1,500 square feet).

RESPONSE

The PDC building would need to be included in the facility at the Devil’s Canyon Road Site. As it would for the VCM Project, the PDC building would serve as the center for receiving electrical power from the SCE feed and distributing it to various equipment that is part of the project. The electrical load at the Devil’s Canyon Road Site is anticipated to be similar to that of the VCM Project. Based on the preliminary layouts and the available information, it was verified that a 1,500-square-foot PDC building would be needed to meet the Devil’s Canyon Road Site requirements. Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, Conceptual Plot Plan, shows the location of the PDC building within the facility boundary.

The Devil’s Canyon Road Site would include the site improvement described above. Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, which provides the Conceptual Plot Plan for the Devil’s Canyon Road Site improvements.

2.1.7 Office building and warehouse.

RESPONSE

The office building and warehouse both need to be included in the facility at the Devil’s Canyon Road Site. Similar to the VCM Project, a new office building for on-site employees and a new warehouse would be constructed to support the operation of the facility. The office building and warehouse would be the same size and height as in the VCM project. Devil’s Canyon Road Site

Drawing 152084-3002-D-SKT, Conceptual Plot Plan, shows the location of the office building and warehouse.

The Devil’s Canyon Road Site would include the site improvement listed above. Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, which provides the Conceptual Plot Plan for the Devil’s Canyon Road Site improvements.

2.1.8 Standby generator with enclosure.

RESPONSE

The standby generator with an enclosure would need to be included in the facility at the Devil’s Canyon Road Site. The proposed natural gas standby generator at the Devil’s Canyon Road Site would be the same size and equipment model as the VCM Project (see Response to 2.3.2 below). There are, however, minor differences between the Devil’s Canyon Road Site Alternative and the VCM Project, such as the addition of a fire water pump at the Devil’s Canyon Road Site. This is not significant and therefore this would not change the size of the proposed standby generator. Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, Conceptual Plot Plan, shows the location of the standby generator inside the facility.

The Devil’s Canyon Road Site would include the site improvement listed above. Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, which provides the Conceptual Plot Plan for the Devil’s Canyon Road Site improvements.

2.1.9 New storage tanks.

RESPONSE

The storage tanks in the VCM Project would also need to be included in the facility at the Devil’s Canyon Road Site. The storage tanks required for both the VCM Project Site and the Devil’s Canyon Road Site include an oily waste storage drum, engine oil storage drum, waste oil storage drum, condensate drip drum, coolant storage drum, compressor area oil waste tank, and a water storage tank. Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, Conceptual Plot Plan, shows the location of each of these tanks inside the facility. The water storage tank, however, is a change from the VCM Project because adequate water and water pressure is assumed to be not readily available for fire protection needs at the Devil’s Canyon Road Site. Additional engineering in future phases of design would be required to validate the tank size.

The Devil’s Canyon Road Site would include the site improvement described above. Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, which provides the Conceptual Plot Plan for the Devil’s Canyon Road Site improvements.

2.1.10 Perimeter fencing, gate, and security features.

RESPONSE

The perimeter fencing, gate, and security features would be included in the facility at the Devil’s Canyon Road Site. The entire site would be surrounded by an 8-foot-tall masonry

security wall. The site would have 30-foot-wide sliding metal gate with card reader on the north side of the site for primary access and a separate metal gate for pedestrian access. Another 15-foot-wide metal gate would be installed the middle of the south wall for additional access as needed. Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, Conceptual Plot Plan, shows the location of the security wall, site access gates and security features.

The Devil’s Canyon Road Site would include the site improvement described above. Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawing 152084-3002-D-SKT, which provides the Conceptual Plot Plan for the Devil’s Canyon Road Site improvements

2.1.11 Site paving.

RESPONSE

The Devil’s Canyon Road Site would require finished grading and site paving including areas requiring asphalt or aggregate surfacing. The Devil’s Canyon Road Site has several existing structures that would need to be demolished prior to site preparation. Devil’s Canyon Road Site Drawing 152084-7022-D-SKT, Conceptual Site Surfacing Plan, shows the site surfacing features included.

The Devil’s Canyon Road Site would include the site improvement described above. Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawing 152084-7022-D-SKT, which details the site surfacing plan for the Devil’s Canyon Road Site.

Please confirm where construction details for the site alternatives would be likely to differ from the VCM Project, for example:

2.1.12 Please provide a list of anticipated construction equipment required for each site alternative (including type and quantity) and number of hours to be operated.

RESPONSE

The construction of the Devil’s Canyon Road Site would include the additional phases and equipment that are highlighted in grey in Table 2-1, below. Construction of the Devil’s Canyon Road Site would require a greater number of workdays to complete soil remediation and well abandonment phases as well as off-site infrastructure construction when compared to the VCM Project. All remaining phases would be the same as the VCM Project.

Please refer to Appendix 2-C, Air Quality and Greenhouse Gas Emissions Analysis of Devil’s Canyon Road Site, for the information on which this response was based.

TABLE 2-1
Devil’s Canyon Road Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours Per Day ^c	Load Factor ^d
A1		Tractors/Loaders/Backhoes	107	1	Diesel	[7]	0.37

TABLE 2-1
Devil’s Canyon Road Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours Per Day ^c	Load Factor ^d
	Site Assessment (Site Preparation)	Bore/Drill Rigs	300	1	Diesel	(8)	0.5
A2	Soil Remediation (Site Preparation)	Excavators	346	1	Diesel	[8]	0.38
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	321	1	Diesel	[7]	0.37
		Generator Sets	49	1	Diesel	[8]	0.74
A3	Well Abandonment (Building Construction)	Other General Industrial Equipment	200	4	Diesel	[8]	0.29
		Graders	200	2	Diesel	[8]	0.74
		Bore/Drill Rigs	550	3	Diesel	(8)	0.37
		Excavators	250	2	Diesel	[8]	0.38
		Cranes	320	4	Diesel	[7]	0.29
		Pumps	550	4	Diesel	[8]	0.74
		Other Construction Equipment	115	3	Diesel	[8]	0.42
		Bore/Drill Rigs	450	3	Diesel	(8)	0.5
		Off-Highway Trucks	320	4	Diesel	(8)	0.38
		Welders	50	2	Diesel	[8]	0.45
A4	Off site Laydown Development (Site Preparation)	Cranes	275	1	Diesel	[7]	0.29
		Forklifts	74	1	Diesel	[8]	0.2
		Tractors/Loaders/Backhoes	225	1	Diesel	[7]	0.37
		Welders	24	4	Diesel	[8]	0.45
		Excavators	443	3	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	107	1	Diesel	[7]	0.37
		Excavators	45	1	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	321	1	Diesel	[7]	0.37
		Air Compressors	2	1	Diesel	[6]	0.48
		Generator Sets	49	3	Diesel	[8]	0.74
		Graders	250	1	Diesel	[8]	0.41
		Rollers	125	1	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	74	1	Diesel	[7]	0.37
		Bore/Drill Rigs	300	1	Diesel	(8)	0.5
		Skid Steer Loaders	65	1	Diesel	(8)	0.37
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
A5		Excavators	346	8	Diesel	[8]	0.38

TABLE 2-1
Devil’s Canyon Road Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours Per Day ^c	Load Factor ^d
	Gas Pipeline Installation (Building Construction)	Concrete/Industrial Saws	261	8	Diesel	[8]	0.73
		Rubber-Tired Dozers	363	2	Diesel	[8]	0.4
		Other Construction Equipment	319	8	Diesel	[8]	0.42
		Other Construction Equipment	109	1	Diesel	[8]	0.42
		Welders	24	4	Diesel	[8]	0.45
		Graders	250	1	Diesel	[8]	0.41
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	74	2	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	350	3	Diesel	[7]	0.37
		Skid Steer Loaders	65	3	Diesel	(8)	0.37
		Bore/Drill Rigs	173	1	Diesel	(8)	0.5
		Other General Industrial Equipment	23	3	Diesel	[8]	0.34
		Generator Sets	22	3	Diesel	[8]	0.74
A6	Electrical Interconnect (Building Construction)	Air Compressors	10	2	Diesel	[6]	0.48
		Forklifts	82	1	Diesel	[8]	0.2
		Generator Sets	49	2	Diesel	[8]	0.74
1	Subsurface Exploration (Site Preparation)	Tractors/Loaders/Backhoes	107	1	Diesel	[8]	0.37
		Excavators	45	1	Diesel	[8]	0.38
		Air Compressors	2	1	Diesel	[6]	0.48
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	321	1	Diesel	[8]	0.37
		Bore/Drill Rigs	300	1	Diesel	(8)	0.5
2	Demo Existing Equipment & Piping (Demolition A)	Concrete/Industrial Saws	33	1	Diesel	[8]	0.73
		Tractors/Loaders/Backhoes	107	1	Diesel	[8]	0.37
		Excavators	45	1	Diesel	[8]	0.38
		Air Compressors	2	1	Diesel	[6]	0.48
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	321	1	Diesel	[8]	0.37
		Skid Steer Loaders	65	1	Diesel	(8)	0.37
3	Site Preparation/ Rough Grading (Grading)	Excavators	45	1	Diesel	[8]	0.38
		Tractors/Loaders/Backhoes	107	1	Diesel	[8]	0.37
		Air Compressors	2	1	Diesel	[6]	0.48

TABLE 2-1**Devil’s Canyon Road Site Off-Road Construction Equipment**

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours Per Day ^c	Load Factor ^d
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
4	Foundations (Building Construction)	Air Compressors	10	1	Diesel	[6]	0.48
		Cranes	275	1	Diesel	[7]	0.29
		Excavators	45	1	Diesel	[8]	0.38
		Excavators	346	1	Diesel	[8]	0.38
		Forklifts	74	1	Diesel	[8]	0.2
		Forklifts	[82]	1	Electric	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Rubber-Tired Dozers	170	1	Diesel	[8]	0.4
		Tractors/Loaders/Backhoes	225	1	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	321	1	Diesel	[7]	0.37
		Tractors/Loaders/Backhoes	107	1	Diesel	[7]	0.37
		Welders	24	2	Diesel	[8]	0.45
		Welders	24	2	Diesel	[8]	0.45
5	Trenching/ Undergrounds (Trenching)	Pumps ^e	[11]	2	Diesel	[8]	0.74
		Excavators	45	1	Diesel	[8]	0.38
6	Equipment, Structural Steel & Building Erection, Piping (Building Construction)	Aerial Lifts	67	1	Diesel	(8)	0.31
		Aerial Lifts	[46]	5	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Air Compressors	10	1	Diesel	[6]	0.48
		Cranes	200	1	Diesel	[7]	0.29
		Cranes	275	2	Diesel	[7]	0.29
		Excavators	45	1	Diesel	[8]	0.38
		Forklifts	[82]	1	Electric	[8]	0.2
		Forklifts	122	1	Diesel	[8]	0.2
		Forklifts	74	1	Diesel	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	225	2	Diesel	[7]	0.37
		Welders	24	2	Diesel	[8]	0.45
		Welders	[46]	5	Electric	[8]	0.45
7	Electrical & Instrumentation	Aerial Lifts	[46]	4	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Air Compressors	10	2	Diesel	[6]	0.48

TABLE 2-1
Devil’s Canyon Road Site Off-Road Construction Equipment

Phase Name		Equipment Type	HP ^a	No. per Day	Fuel Type ^b	Hours Per Day ^c	Load Factor ^d
	(Building Construction)	Cranes	200	1	Diesel	[7]	0.29
		Cranes	275	2	Diesel	[7]	0.29
		Forklifts	[82]	1	Electric	[8]	0.2
		Forklifts	74	1	Diesel	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Off-Highway Trucks	500	1	Diesel	(8)	0.38
		Tractors/Loaders/Backhoes	225	2	Diesel	[7]	0.37
		Welders	[46]	5	Electric	[8]	0.45
		Welders	24	2	Diesel	[8]	0.45
8	Paving (Paving)	Rollers	125	1	Diesel	[8]	0.38
9	Painting/ Insulation (Architectural Coating)	Air Compressors	10	1	Diesel	[6]	0.48
		Generator Sets	49	1	Diesel	[8]	0.74
10	Commissioning/ Startup and Testing (Building Construction)	Aerial Lifts	[46]	4	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Cranes	275	1	Diesel	[7]	0.29
		Forklifts	74	1	Diesel	[8]	0.2
		Forklifts	[82]	1	Electric	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Tractors/Loaders/Backhoes	225	2	Diesel	[7]	0.37
		Welders	[46]	3	Electric	[8]	0.45
		Welders	24	2	Diesel	[8]	0.45
12	Decommissioning/ Demolition (Demolition B)	Concrete/Industrial Saws	33	1	Diesel	[8]	0.73
		Excavators	45	1	Diesel	[8]	0.38
		Aerial Lifts	[46]	4	Electric	(8)	0.31
		Air Compressors	49	1	Diesel	[6]	0.48
		Cranes	275	1	Diesel	[7]	0.29
		Forklifts	74	1	Diesel	[8]	0.2
		Forklifts	[82]	1	Electric	[8]	0.2
		Generator Sets	49	3	Diesel	[8]	0.74
		Tractors/Loaders/Backhoes	225	2	Diesel	[8]	0.37
		Welders	[46]	3	Electric	[8]	0.45
		Welders	24	2	Diesel	[8]	0.45

Notes: HP = horsepower

No offroad equipment is expected to be used for Phase 11, Site Restoration, so this phase is not included in this table.

- ^a Engine horsepower ratings in brackets are CalEEMod default values (version 2022.1.1.30).
- ^b All diesel engines are assumed to be EPA Tier 4 Final and Electric engines have an average electric mix.
- ^c Construction “Hours per Day” in brackets are CalEEMod default values. A value of 8 hours per day is used for equipment for which there are no project-specific or CalEEMod default values (i.e., Bore/Drill Rigs, Off-Highway Trucks, Skid Steer Loaders, and Aerial Lifts), and is shown in parentheses.
- ^d Engine load factors are CalEEMod default values (version 2022.1.1.30).
- ^e Pumps are conservatively modeled as diesel units in Phase 5 rather than as electric units in Phase 4 as planned for construction.

2.1.13 Please identify where the equipment type, quantity, hours to be operated, and/or construction phasing may differ for site alternatives when compared with the VCM Project. Include a construction schedule for each site alternative.

RESPONSE

The construction of the Devil’s Canyon Road Site would include the additional phases that are highlighted in grey in Table 2-2, below. Construction of the Devil’s Canyon Road Site Alternative would require a greater number of workdays to complete soil remediation and well abandonment phases, as well as off-site infrastructure construction, compared to the VCM Project. All remaining phases would be the same as for the VCM Project.

Please refer to Appendix 2-C, Air Quality and Greenhouse Gas Emissions Analysis of Devil’s Canyon Road Site, for the information on which this response was based.

TABLE 2-2

Devil’s Canyon Road Site Alternative Preliminary Construction Schedule

Phase Number	Phase Description	Phase Start Date	Phase End Date	Workdays per Phase
A1	Site Assessment	5/1/2029	5/18/2029	14
A2	Soil Remediation	9/21/2029	3/11/2030	122
A3	Well Abandonment	8/16/2029	4/22/2030	178
A4	Off-site Laydown Development	7/2/2035	9/5/2035	48
A5	Gas Pipeline Installation	7/2/2035	3/11/2036	182
A6	Electrical Interconnect	12/27/2035	3/31/2036	68
1	Subsurface Exploration	7/2/2035	9/5/2035	48
2	Demo Existing Equipment & Piping	9/6/2035	12/7/2035	67
3	Site Preparation/ Rough Grading	11/13/2035	12/7/2035	19
4	Foundations	12/10/2035	8/7/2036	174
5	Trenching/Undergrounds	7/9/2036	9/26/2036	58
6	Equipment, Structural Steel & Building Erection, Piping	4/15/2036	2/18/2037	222
7	Electrical & Instrumentation	1/16/2037	12/1/2037	228
8	Paving	12/2/2037	2/2/2038	45
9	Painting/Insulation	1/4/2038	3/3/2038	43

TABLE 2-2**Devil’s Canyon Road Site Alternative Preliminary Construction Schedule**

Phase Number	Phase Description	Phase Start Date	Phase End Date	Workdays per Phase
10	Commissioning/Startup and Testing	12/2/2037	5/12/2038	116
11 ^a	Post Construction/Site Restoration	5/13/2038	6/11/2038	22
12 ^b	Decommissioning/Demolition	5/12/2039	8/15/2039	68

Notes:

- a. No offroad equipment is expected to be used for Phase 11; however, approximately 50 percent of equipment hauling for demobilization will be taking place during Phase 11.
- b. Decommissioning/Demolition is assumed to be completed approximately one year after the new replacement compressors are fully operational and would involve removal of the existing compressors at the current site.

2.1.14 Please provide approximate quantities of material imports and exports at each alternative site.**RESPONSE**

Table 2-3, below, summarizes the estimated quantities of imported and exported materials for the Devil’s Canyon Road Site Alternative, considering both on site (facility and foundations) and off site (pipeline, waterline, wastewater, electrical, road) infrastructure.

TABLE 2-3**Estimated Quantities of Imported and Exported Materials for the Devil’s Canyon Road Site Alternative**

	Fill Quantity (CY)	Excavated Quantity (CY)	Import (CY)	Export (CY)
On site (Facility, Foundations)	18,273	24,183	9,236	N/A
Off site (Pipeline, Road, Waterline, Sewer, Electrical)	15,106	29,235	N/A	3,901
Soil Remediation – On site	N/A	15,146	N/A	15,146
Soil Remediation – Off site	N/A	10,228	N/A	10,228
Total Import/Export			9,236	29,275

Notes: CY = cubic yards; N/A = not applicable.

These figures are preliminary estimates and will require validation and updates during subsequent design phases. The calculations assume that all excavated material is suitable for fill and do not account for changes in soil density between excavation and re-compaction.

On-site construction would require approximately 24,183 cubic yards of excavation and 18,273 cubic yards of fill. However, approximately 15,146 cubic yards of on-site soils is potentially contaminated, leaving the on-site earthwork with an import quantity of approximately 9,236 cubic yards.

Off-site infrastructure would require approximately 29,235 cubic yards of excavation and 15,106 cubic yards of fill. However, approximately 10,228 cubic yards of off-site soils are estimated to be impacted, leaving the off-site earthwork with an export quantity of approximately 3,901 cubic yards.

Based on the Devil’s Canyon Road Site Desktop Hazards Assessment, it is estimated that approximately 15,146 cubic yards of soils within the compressor station area (on site) is impacted due to the tank farm operations, the presence of oil wells, etc. It is also estimated that approximately 10,228 cubic yards of soils within the roadway/utility corridor is potentially impacted due to small and large tanks, sumps, and oil wells (Appendix 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, Section 9.2).

The excess material from the on-site and off-site excavation work could be used to fulfill the on site and off site fill requirements. In total, the site would result in a total of approximately 9,236 cubic yards of import of soil for the entire Devil’s Canyon Road Site and a total of approximately 29,275 cubic yards of export for both on-site and off-site infrastructure.

Please refer to Appendix 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, for relevant earthwork details and potential for contaminated soils.

2.1.15 Please specify the number of construction phase employees, water truck delivery trips, and haul trips that may differ for each alternative site when compared with the VCM Project.

RESPONSE

The construction of the Devil’s Canyon Road Site Alternative would include additional phases of construction compared to the VCM Project, which would require additional construction workers and vendors. This additional information is highlighted in grey in Table 2-4, below. Construction of the Devil’s Canyon Road Site Alternative would require a greater number of workdays to complete soil remediation and well abandonment phases, as well as off-site infrastructure construction, when compared to the VCM Project. All remaining phases would be the same as the VCM Project.

Please refer to the Appendix 2-C for the Air Quality and Greenhouse Gas Emissions Analysis of Devil’s Canyon Road Site (Appendix 2-C), for the information on which this response was based.

TABLE 2-4
Devil’s Canyon Road Site Construction Crew Vehicle Types

Phase Work Description		Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix
A1	Site Assessment	Worker	12	10	LDA, LDT1, LDT2
		Vendor	4	10	HHDT, MHDT
A2	Soil Remediation	Worker	18	10	LDA, LDT1, LDT2
		Vendor	12	10	HHDT, MHDT

TABLE 2-4
Devil’s Canyon Road Site Construction Crew Vehicle Types

Phase Work Description		Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix
		Hauling	20	46	HHDT
A3	Well Abandonment	Worker	70	10	LDA, LDT1, LDT2
		Vendor	49	10	HHDT, MHDT
		Hauling	30	43	HHDT
A4	Off-site Laydown Development	Worker	11	10	LDA, LDT1, LDT2
		Vendor	18	10	HHDT, MHDT
A5	Gas Pipeline Installation	Worker	135	10	LDA, LDT1, LDT2
		Vendor	20	10	HHDT, MHDT
		Hauling	7	44	HHDT
A6	Electrical Interconnect	Worker	27	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	4	45	HHDT
1	Subsurface Exploration	Worker	28	10	LDA, LDT1, LDT2
		Vendor	8	10	HHDT, MHDT
		Hauling	5	43	HHDT
2	Demo Existing Equipment & Piping	Worker	27	10	LDA, LDT1, LDT2
		Vendor	8	10	HHDT, MHDT
		Hauling	14	45	HHDT
3	Site Preparation / Rough Grading	Worker	30	10	LDA, LDT1, LDT2
		Vendor	10	10	HHDT, MHDT
		Hauling	52	43	HHDT
4	Foundations	Worker	68	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	10	43	HHDT
5	Trenching/Undergrounds	Worker	46	10	LDA, LDT1, LDT2
		Vendor	2	10	HHDT, MHDT
		Hauling	9	43	HHDT
6	Equipment, Structural Steel & Building Erection, Piping	Worker	78	10	LDA, LDT1, LDT2
		Vendor	22	10	HHDT, MHDT
		Hauling	1	43 (297)	HHDT
7	Electrical & Instrumentation	Worker	36	10	LDA, LDT1, LDT2
		Vendor	16	10	HHDT, MHDT
		Hauling	1	43	HHDT

TABLE 2-4
Devil’s Canyon Road Site Construction Crew Vehicle Types

Phase Work Description		Trip Type	One-Way Trips per Day	Miles per One-Way Trip	Vehicle Mix
8	Paving	Worker	22	10	LDA, LDT1, LDT2
		Hauling	12	43	HHDT
9	Painting/Insulation	Worker	4	10	LDA, LDT1, LDT2
		Hauling	9	43	HHDT
10	Commissioning / Startup and Testing	Worker	28	10	LDA, LDT1, LDT2
		Vendor	12	10	HHDT, MHDT
		Hauling	3	43	HHDT
11	Post Construction / Site Restoration	Hauling	14	43	HHDT
12	Decommissioning/Demolition	Worker	28	10	LDA, LDT1, LDT2
		Vendor	18	10	HHDT, MHDT
		Hauling	3	20	HHDT

Notes:

- Vehicle Mix: LDA = Light Duty Automobile, LDT1 = Light Duty Trucks up to 3,750 pounds (lbs) loaded vehicle weight (LVW), LDT2 = Light Duty Trucks 3,750–8,500 lb LVW, MHDT = Medium Heavy-Duty Trucks (8,500–14,000 lb), HHDT = Heavy Heavy-Duty Trucks (>14,000 lb).
- Hauling trip mileages for Equipment, Structural Steel & Building Erection, and Piping phase (Phase 6) are average one-way distances from the Devil’s Canyon Road Site to the County Line for criteria pollutant emissions because the trip destinations/directions are not known. The second value in italics is the one-way hauling distances from the Devil’s Canyon Road Site to the Arizona State Line used to estimate GHG emissions.
- For phases involving both hauling of material from the site to landfill (~46 miles) and delivery of equipment to the site (~43 miles), since only one hauling entry is allowed per phase in CalEEMod, the haul distances were calculated using a weighted average of the distances. For example, for Phase A5, which includes 3 trips to the landfill and 4 equipment delivery trips, a total of 7 trips was entered with a weighted average distance of 44 miles.
- Hauling trip mileage for Phase 12 (i.e., Decommissioning/Demolition) is CalEEMod default.

2.1.16 Please provide a description of any anticipated earthwork at the site, construction staging yards, and for associated infrastructure such as access roads, gas supply pipelines, and other utilities such as electrical or water, including (but not limited to): acres of grading with anticipated volumes of cut and fill for the site and construction staging yard; grading for access roads; and excavation widths and depths for poles, utilities, and foundations. For the Devil’s Canyon Road Site Alternative, provide anticipated excavation boundaries and depths for locations where existing active wells may need to be decommissioned.

RESPONSE

The anticipated earthwork activities are divided into two categories: (1) the oil well abandonment and soil remediation activities and (2) the construction activities.

Oil Well Abandonment and Soil Remediation

The following paragraphs describe the oil well abandonment and soil remediation activities that would be associated with earthwork quantities.

The Devil’s Canyon Road Site would require four existing active/idle oil wells within the proposed plot plan to be plugged and abandoned before demolition of the existing oil production equipment can begin. This does not account for any additional existing underground infrastructure/piping. As such, future site investigations would need to be completed. Any existing oil wells and oil production equipment outside the proposed plot plan would remain in place.

Construction of the Devil’s Canyon Road Site would require an additional seven wells to be either decommissioned or re-abandoned along the proposed new pipeline routes: six wells (two are active/idle and four are plugged and abandoned) along Devil’s Canyon Road and one well (plugged and abandoned) along Cable Canyon Road. Any existing oil wells and oil production equipment outside the proposed routes would remain in place.

The proposed Devil’s Canyon Road Site compressor station location is anticipated to require remediation of soils impacted by the historical and ongoing use of the site for oil and gas operations (Appendix 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, Section 9.1). Additionally, the roadway/utility corridor, which also overlaps with historical and ongoing use for oil and gas operations, is also anticipated to require remedial activities (Appendix 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, Section 9.2).

Construction Activities

The following paragraphs describe the construction activities that would be associated with earthwork quantities.

Demolition of Existing Infrastructures

The Devil’s Canyon Road Site requires the demolition of any existing structures, included but not limited to associated foundations and existing equipment, that would be impacted within the proposed facility boundary.

Temporary Staging Area

The Devil’s Canyon Road Site has a remote staging area located approximately 0.25 miles from the existing access road to the Devil’s Canyon Road Site. The temporary staging area would be stripped and prepared for use by workers and material deliveries. There are nine existing oil wells at the temporary staging area that would remain in place. Since this is a temporary staging area, it is assumed they would not be required to be decommissioned.

Natural Gas Transmission Pipelines

The Devil’s Canyon Road Site would require new natural gas transmission pipelines, that include two suction and two discharge which would tie-in into the main transmission pipelines. One set

of suction and discharge pipelines would run through Devil’s Canyon Road. A second set of suction and discharge pipelines would run through Cable Canyon Road.

Southern California Edison (SCE) Electrical Interconnection

The Devil’s Canyon Road Site would receive power from the existing SCE Grandad circuit. To connect to this circuit, approximately 34 new poles would be installed along approximately 8,200 feet of Devils Canyon Road and Taylor Ranch Road to deliver power to the Devil’s Canyon Road Site.

Water and Sewer

The Devil’s Canyon Road Site would require installation of new water and sewer lines. It is assumed the connection to the existing services is located to the west of the Ventura River Bridge on Mill Canyon Road.

Earthwork

The earthwork for the Devil’s Canyon Road Site would consist of Stormwater Pollution Prevention Plan (SWPPP) implementation, clearing and grubbing, and cut-to-fill leveling; the remaining work would be consistent with the VCM Project. The anticipated earthwork volumes are summarized in Table 2-5, below.

TABLE 2-5
Anticipated Earthwork Volumes

Item No.	Description	Volume (CY) Devil’s Canyon Road Site	Volume (CY) VCM Project Site
1	Site Excavation	6,453	1,907
2	Site Fill	6,453	3,400
3	Roadway Excavation	1,533	0*
4	Roadway Fill	N/A	0*
5	Wastewater Line Excavation	513	0*
6	Wastewater Line Bedding	103	0*
7	Wastewater Line Backfill	411	0*
8	Waterline Excavation	513	0*
9	Waterline Bedding	103	0*
10	Waterline Backfill	411	0*
11	Foundation Excavation	17,730	17,250
12	Foundation Backfill	11,820	11,500
13	Pipeline Excavation	26,624	0*
14	Pipeline Bedding	1,949	0*
15	Pipeline Backfill	22,019	0*
16	Electrical Interconnect Excavation	51	0*

TABLE 2-5
Anticipated Earthwork Volumes

Item No.	Description	Volume (CY) Devil’s Canyon Road Site	Volume (CY) VCM Project Site
17	Electrical Interconnect Backfill	N/A	0*
18	Oil Well Abandonment – Excavation	358	0*
19	Oil Well Abandonment – Backfill	489	0*
20	Soil Remediation	25,374	0*

Notes: CY = cubic yards; VCM = Ventura Compressor Station Modernization; N/A = not applicable.

* Off-site infrastructure or oil well abandonment impact does not apply to the proposed project.

Please refer to Appendix 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, for information on the anticipated soil remediation due to oil and gas operations on the Devil’s Canyon Road Site.

Please confirm that general information for each of the three site alternatives includes the following information (see Responses to Sections 2.1.17–2.1.20) for each alternative site, access roads, electrical supply, and pipeline routes:

2.1.17 Site photos.

RESPONSE

The photo in Exhibit 2-1, below, was taken by SoCalGas and Burns & McDonnell in April 2025 from land to which SoCalGas has access rights to assess site conditions.

Site access was not granted by the landowner, so detailed/close-up photos of the access road, electrical interconnect, and new pipeline alignment are not available.

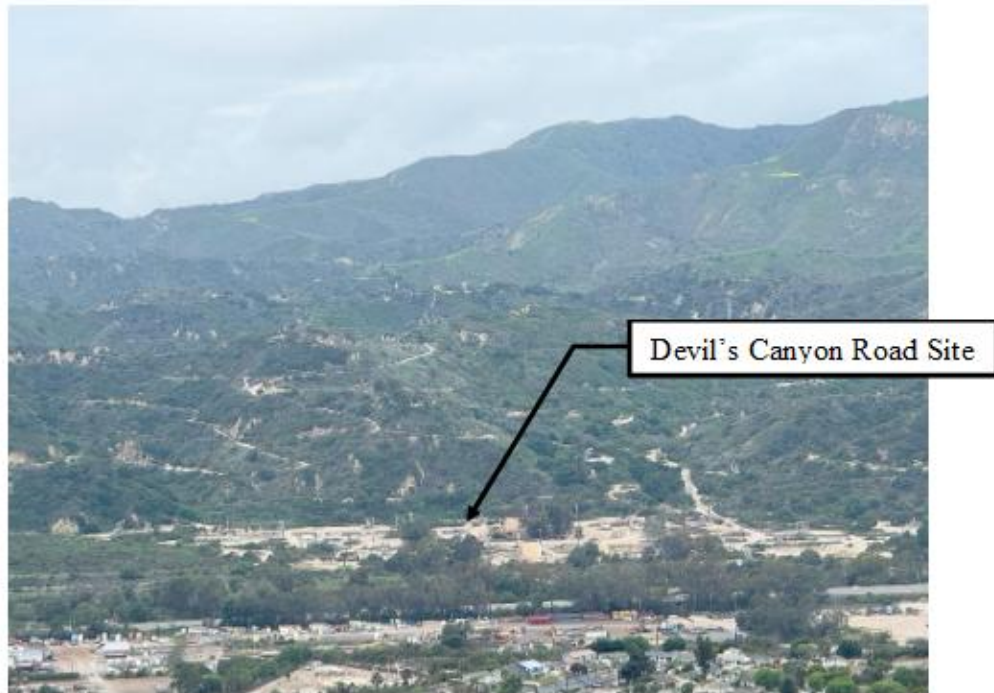


Exhibit 2-1: West-facing view of the Devil's Canyon Road Site from across the valley

The photos in Exhibits 2-2 through 2-7 were taken by SoCalGas in January 2022 from land to which SoCalGas has access rights to assess site conditions.



Exhibit 2-2: East-facing view of the west side of the bridge crossing the Ventura River to access the Devil's Canyon Road Site

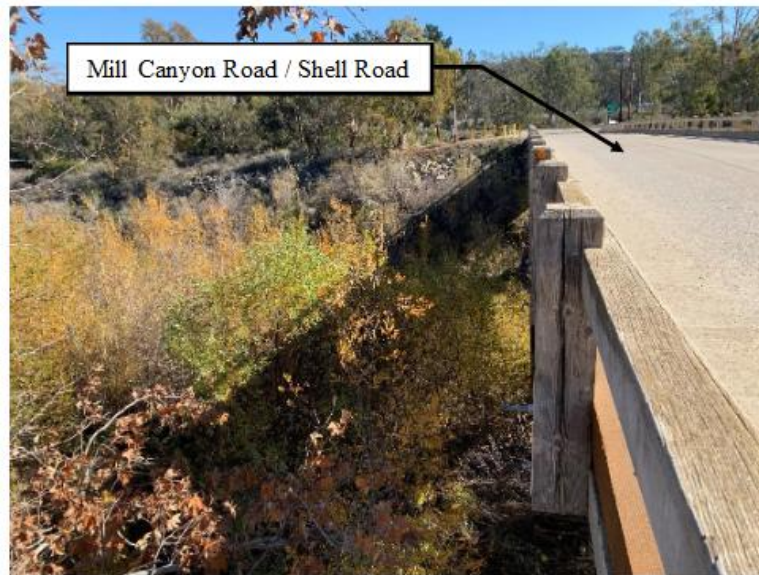


Exhibit 2-3: East-facing view of the Ventura River and north side of the bridge on Mill Canyon Road/Shell Road



Exhibit 2-4: East-facing view of the Ventura River and south side of the bridge on Mill Canyon Road/Shell Road



Exhibit 2-5: East-facing view along Mill Canyon Road/Shell Road on the west side of the Ventura River Bridge

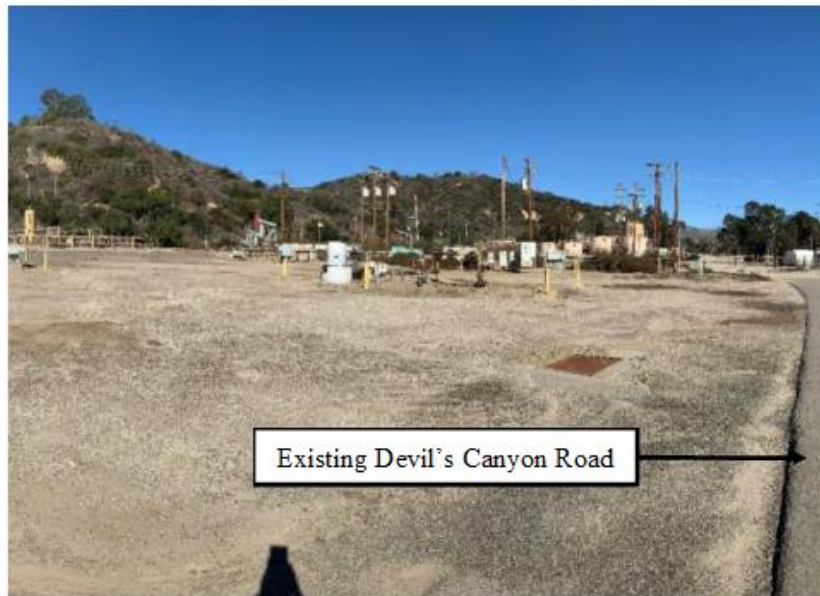


Exhibit 2-6: Existing conditions at the Devil's Canyon Road Site



Exhibit 2-7: Existing conditions at the Devil's Canyon Road Site (Close-Up of Tanks)

The photos in Exhibits 2-8 through 2-10 are from Google Earth aerial imagery (Street View), published in May 2025.



Exhibit 2-8: West-facing view of the proposed temporary staging area near oil well



Exhibit 2-9: West-facing view of the proposed temporary staging area

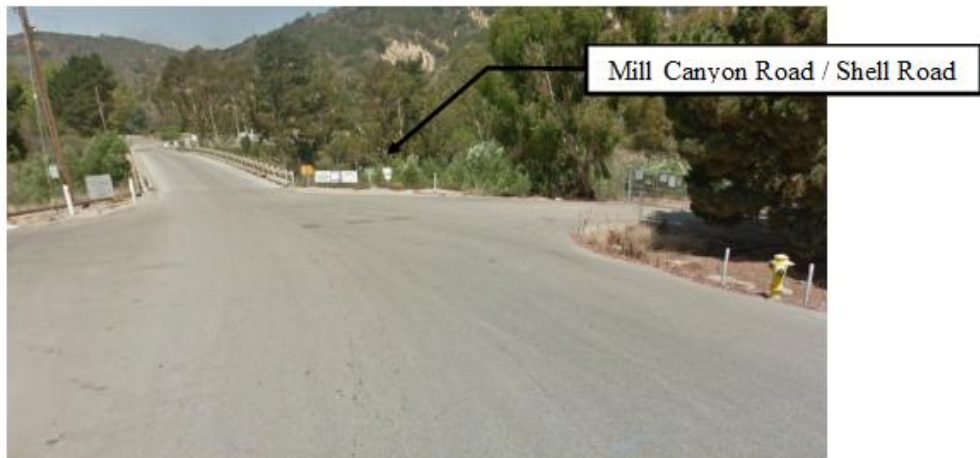


Exhibit 2-10: West-facing view of the east side of the bridge crossing the Ventura River to access the Devil's Canyon Road Site

The following aerial photos in Exhibits 2-11 through 2-13 were taken by SoCalGas in March 2022 for the purposes of the Feasibility Study that was requested by CPUC in August 2021.

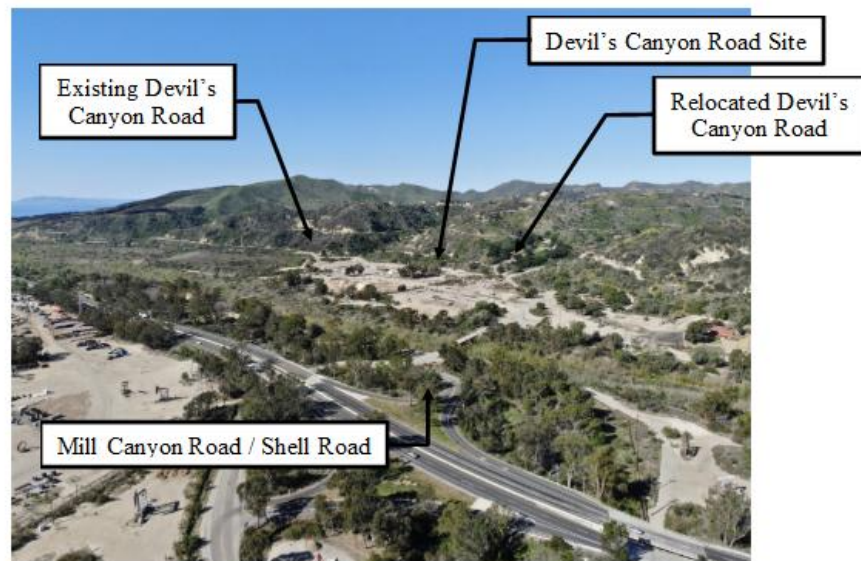


Exhibit 2-11: Southwest-facing view of the existing Devil's Canyon Road Site

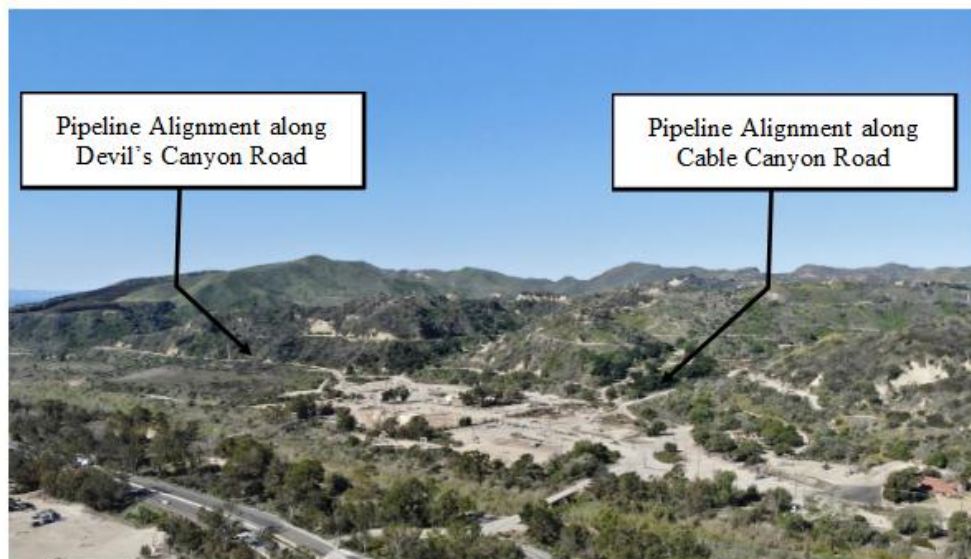


Exhibit 2-12: Southwest-facing view of the proposed pipeline routes



Exhibit 2-13: West-facing view of the north side of the existing Devil’s Canyon Road Site, Mill Canyon Road/Shell Road, and Cable Canyon Road

2.1.18 Topographic maps.

RESPONSE

For the topographic maps for the Devil’s Canyon Road Site, please refer to Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-7023-D-SKT, Conceptual Grading Plan, and 152084-7026-D-SKT, Conceptual Topographic Map.

2.1.19 Site conditions description (e.g., existing exposed soil, pavement).

RESPONSE

The Devil’s Canyon Road Site is situated within an oil processing operation, just west of Highway 33, approximately 5,300 feet northwest of the existing VCM Site. The Devil’s Canyon Road Site can be accessed through Devil’s Canyon Road, which is a private road. This road currently runs through the middle of the Devil’s Canyon Road Site.

The Devil’s Canyon Road Site is currently an existing Aera Energy LLC facility with various oil processing equipment, including production wells, storage tanks, separators, pumps, and facility piping. Most of the surface is exposed soil or compacted dirt, with small patches of bushes and trees, as shown on Exhibit 2-14. The photo in Exhibit 2-14 was taken by SoCalGas in January 2022 from land to which SoCalGas has access rights to assess site conditions.



Exhibit 2-14: Existing conditions and oil facility at the Devil's Canyon Road Site

The Devil's Canyon Road Site has substantial well infrastructure that would have impacts to site development. According to California Geology Energy Management Division (CalGEM) records, there are four existing oil wells within the facility boundary.

Based on the photos taken in January 2022, the access road does not appear to have a distinct drainage curb and stormwater gutter system. Additional site investigations would be needed to assess the existing stormwater infrastructure at this site.

There are existing electrical utility poles within the Aera Energy LLC facility that presumably supply power to the oilfield operations, as shown on Exhibit 2-15. The photos in Exhibits 2-15 and 2-16 were taken by SoCalGas in January 2022 from land to which SoCalGas has access rights to assess site conditions.



Exhibit 2-15: Existing conditions at the Devil’s Canyon Road Site

There are existing storage tanks, auxiliary equipment, and interconnecting piping within the Aera Energy LLC facility to support current operations, as shown in Exhibit 2-16.



Exhibit 2-16: Existing conditions at the Devil’s Canyon Road Site

Considering there is an existing oil operation at the Devil’s Canyon Road Site and buildings in the area, it is assumed that there is an existing firewater system and, at a minimum, a water main in the area.

The proposed pipeline alignment follows two routes: one is a loop traversing the mountainous landscape along Cable Canyon Road, which is an unpaved road, and the second is south of the proposed facility along Devil’s Canyon Road. Both Cable Canyon Road and Devil’s Canyon Road are private roads. The terrain has various oil wells and interconnecting oil/water pipelines (above and potentially below ground) throughout the route. See Exhibit 2-17 for an image of the terrain surrounding the Devil’s Canyon Road Site. The photo in Exhibit 2-17 is from aerial photography taken by SoCalGas in 2022 for the purposes of the Feasibility Study requested by CPUC in August 2021.



Exhibit 2-17: West-facing view of the Devil’s Canyon Road Site and surrounding terrain

2.1.20 Details about unique activities necessary to develop each site (e.g., regarding drainage, paving, cut/fill grading).

RESPONSE

The Devil’s Canyon Road Site is in a developed area of Ventura County and on a site that would require minimal cut/fill and grading activities. The site also has adequate existing utility infrastructure surrounding the site and would accommodate short tie-in lateral runs for water and sewer. Other unique activities for Devil’s Canyon Road Site are as follows:

- The Devil’s Canyon Road Site would receive power from the existing SCE Grandad circuit. To connect to this circuit, approximately 34 new poles would be installed along 8,200 feet of Devil’s Canyon Road and Taylor Ranch Road to deliver power to the Devil’s Canyon Road Site.
- A new road would be constructed to relocate Devil’s Canyon Road to provide access to the existing Aera Energy LLC facility operations. The relocated road would be constructed along an existing path that exists west of the site from Cable Canyon Road

on the north to Devil’s Canyon Road on the south, winding between several oil wells. See Devil’s Canyon Road Site Drawing 152084-7021-D-SKT, Conceptual Overall Surfacing Plan, for details.

- The Devil’s Canyon Road Site has existing structures—oil-processing equipment, including wells, storage tanks, separators, pumps, facility piping, and potential underground utilities—that would need to be demolished. Additional site investigation would be needed to understand the extent of demolition required, particularly for subsurface infrastructure.
- The Devil’s Canyon Road Site has substantial well infrastructure that would have impacts on site development. According to CalGEM records, there are four existing oil wells within the facility boundary. SoCalGas would coordinate with CalGEM and the County of Ventura to plug and abandon the well infrastructure as necessary to accommodate the new facility. Site investigation is needed to evaluate the extent of oil well infrastructure. See Devil’s Canyon Road Site Drawing 152084-3004-D-SKT, Conceptual Plot Plan with Wells, showing the location of the existing oil wells and the preliminary facility equipment arrangement.
- The Devil’s Canyon Road Site is approximately 1 mile from the existing VCM Project Site and would require the installation of new gas supply and discharge pipelines and the acquisition of additional pipeline right-of-way. The Devil’s Canyon Road Site Alternative would include two new 20-inch-diameter suction pipelines and two new 20-inch-diameter discharge transmission pipeline installations, both approximately 2.8 miles long. See Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan, for details on the gas pipelines and the other utilities.
- The proposed Devil’s Canyon Road Site compressor station location is estimated to require remediation of approximately 15,146 cubic yards of soils impacted by the historical and ongoing use of the site for oil and gas operations (Attachment 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, Section 9.1). Additionally, approximately 10,228 cubic yards of soil is anticipated to be impacted within the roadway/utility corridor, which also overlaps with historical and ongoing use for oil and gas operations (Attachment 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, Section 9.2).

Please refer to Appendix 2-D, Desktop Hazards Assessment for VCM Project – Devil’s Canyon Road Site, and Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-7021-D-SKT, Conceptual Overall Surfacing Plan; 152084-3004-D-SKT, Conceptual Plot Plan with Wells; and 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan.

2.1.21 If the areas for alternative site features, off-site infrastructure for alternative sites, or any extra work areas (e.g., staging or parking areas) are different from those considered since the mailing list was compiled by SoCalGas for the 2023 PEA, please

provide the necessary changes to the comprehensive mailing list, consistent with the PEA Checklist requirements.

RESPONSE

Please refer to Appendix 2-E for the PDF of the updated mailing list for all the features and off-site infrastructure for the Devil’s Canyon Road Site. The Excel file of the mailing list is included as Attachment 2-B.

2.2 Aesthetics

For each of the three site alternatives, please provide visual simulations from appropriate viewpoints depicting existing conditions and conditions with the features and land changes associated with development of each alternative site.

RESPONSE

Four visual simulations were created for the Devil’s Canyon Road Site Alternative, including two simulations of the compressor station site and two simulations along the utility/roadway corridor. These visual simulations consist of photorealistic 3-D models of the Devil’s Canyon Road Site Alternative’s features and any related landform alteration. Public visibility of the Devil’s Canyon Road Site was assessed based on reconnaissance, aerial maps, and where the compressor station and off-site components would be located. Based on this selection process, the four key observation points, or “views,” were selected, as listed below and shown on Exhibit 2-18:

- View 1: From the curve in Delaware Drive, looking west
- View 2: From the shoulder of Highway 33 near Pacos Street, looking southwest
- View 3: From the shoulder of Highway 33 just south of West Stanley Avenue, looking northwest
- View 4: From the Grant Park Ridgeline Trail, looking northwest

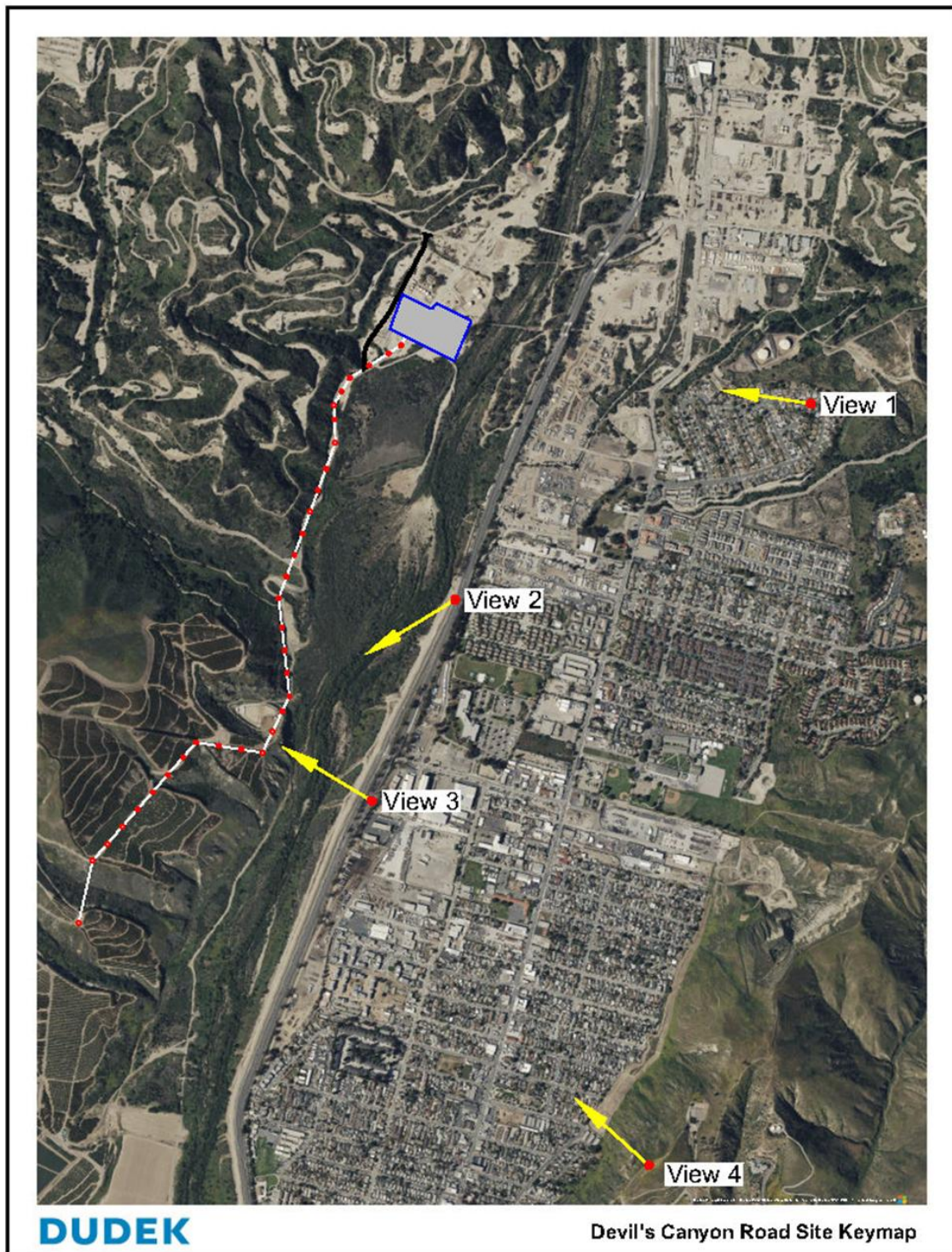


Exhibit 2-18: Devil's Canyon Road Site overview showing Views 1–4

The capture time, date, and other technical details of the high-resolution photographs taken from View 1 through View 4 are provided in Table 2-6, below.

TABLE 2-6
Technical Details of Photographs – Devil’s Canyon Road Site

Exhibit Nos.,^a View	Capture Time	Capture Date	Camera Type	Lens Focal Length	Camera Height	Direction
2-19a, 2-19b, View 1	2:01 p.m.	August 23, 2025	Canon EOS 6D	50 mm	Approximately 5.5 Feet Above Ground Level	Facing West
2-20a, 2-20b, View 2	10:00 a.m.	June 22, 2025	Canon EOS 6D	50 mm	Approximately 5.5 Feet Above Ground Level	Facing Southwest
2-21a, 2-21b, View 3	9:37 a.m.	June 22, 2025	Canon EOS 6D	50 mm	Approximately 5.5 Feet Above Ground Level	Facing Northwest
2-22a, 2-22b, View 4	2:03 p.m.	January 27, 2023	iPhone XS	50 mm ^b	Approximately 5.5 Feet Above Ground Level	Facing Northwest

Notes: mm = millimeters.

^a Exhibits with “a” show the existing conditions; exhibits with “b” show visual simulations of the Devil’s Canyon Road Site Alternative overlaid onto the photographs of the existing conditions.

^b Image was cropped to a 40 degree horizontal field of view to simulate a 50 mm lens focal length.

View 1 displays the view to the Devil's Canyon Road Site compressor station from the neighborhood directly across Highway 33 east of the site. In Exhibit 2-19b, the compressor station is visible in the distance in the center of the image.



Exhibit 2-19a: View 1 – existing conditions



Exhibit 2-19b: View 1 – simulated Devil's Canyon Road Site Alternative conditions

View 2 displays the view toward the utility corridor, looking westward from Highway 33. The addition of electrical poles can be seen in Exhibit 2-20b, with poles depicted in the center and left portions of the image.



Exhibit 2-20a: View 2 – existing conditions



Exhibit 2-20b: View 2 – simulated Devil's Canyon Road Site Alternative conditions

View 3 displays the view toward the utility corridor from Highway 33. The electrical poles along the center of the image are visible in Exhibit 2-21b.



Exhibit 2-21a: View 3 – existing conditions



Exhibit 2-21b: View 3 – simulated Devil's Canyon Road Site Alternative conditions

View 4 offers a view of the Devil’s Canyon Road Site compressor station and utility corridor at a greater distance from and from a higher vantage point than View 1. In Exhibit 2-22b, the compressor station is visible in the distance on the right side of the image, as are the electrical pole additions that emanate from the compressor station, following the hillside.



Exhibit 2-22a: View 4 – existing conditions



Exhibit 2-22b: View 4 – simulated Devil’s Canyon Road Site Alternative conditions

2.3 Air Quality, Greenhouse Gases, and Energy

For each of the three site alternatives, please include the following information:

- 2.3.1 Please provide emissions calculations to quantify the changes in air pollutants and greenhouse gas emissions stemming from construction of the site alternatives, as they may differ from those of the VCM Project (e.g., due to additional site preparation or grading).**

RESPONSE

Emissions calculations for the Devil’s Canyon Road Site Alternative are presented in the Air Quality and Greenhouse Gas Emissions Analysis, included in Appendix 2-C to this document. Compared to the VCM Project, the Devil’s Canyon Road Site Alternative would require additional construction activities due to the existing wells at the site and the construction of off-site infrastructure. A detailed comparison of the construction activity differences is provided in Table 2-7, below.

TABLE 2-7**Construction Activity Differences Between VCM Project
and Devil’s Canyon Road Site Alternative**

Construction Phase	VCM Project	Devil’s Canyon Road Site
Existing Wells at the Proposed Site Location	There are no existing wells.	Decommissioning, abandonment/re-abandonment of 11 existing wells. Soil remediation associated with well abandonment.
Natural Gas Transmission System Pipeline modifications	There are no gas transmission system pipeline modifications required for the VCM Project.	A second set of suction and discharge gas transmission pipeline would be required as the original route is constrained with space availability to install four lines due to the several active wells on either side of the route and can only accommodate two lines instead of four. Four lines (two suction pipelines and two discharge pipelines) are required to meet the ability to maintain system reliability.
Grading	Minimal grading because the VCM Project is already developed on a developed site.	New grading would be required to align with current topography, meet conceptual grading design parameters for proper drainage, and comply with Ventura County stormwater management requirements.
Access Road	There is an existing access road available.	New grading and paving would be required for relocated access road.
Demolition of Existing Structures Above Ground	There are no major existing structures above ground to be demolished.	Demolition of major existing structures from the exiting Aera Energy LLC facility operations would be required.
Utilities	There is an existing connection available for utilities such as water, wastewater, and power	New utilities would be installed that would connect to an assumed tie-in connection for water and wastewater (or sanitary sewer). For electrical interconnection, the preliminary routing of transmission poles has been identified after discussions with Southern California Edison (SCE).

Note: VCM = Ventura Compressor Station Modernization.

Please refer to Appendix 2-C for the Air Quality and Greenhouse Gas Emissions Analysis for Devil’s Canyon Road Site for more detail on the information presented in this response.

2.3.2 Would the capacity and specifications for the proposed natural gas standby generator at site alternatives be the same as with the VCM Project?

RESPONSE

Yes, the capacity and specifications for the proposed natural gas standby generator for the Devil’s Canyon Road Site Alternative would be the same as for the VCM Project. As stated in the PEA, the Devil’s Canyon Road Site Alternative would include one new 840 HP natural gas standby generator engine (standby generator), rated at approximately 560 kilowatts peak output power.

2.3.3 Will any existing emission sources remain over the long-term at the original project site if an alternative site is used?

RESPONSE

Yes, existing emission sources would remain over the long term at the original VCM Project Site if any of the three alternative sites are selected. The existing Ventura Compressor Station would be decommissioned approximately 1 year after an alternative site is fully operational, including three natural gas compressors and related station components, and all emissions associated with compressor operations would be eliminated. The identified remaining emission sources include (1) combustion emissions from a portable diesel emergency generator used for backup power in the event of a facility power outage, (2) fugitive emissions from the remaining transmission pipeline components used to provide Meter Run services,² and (3) potential pipeline blowdown emissions during maintenance and repair activities. By way of summary, this response will do the following:

1. Estimate criteria pollutants from the remaining portable diesel emergency generator.
2. Estimate natural gas volumes of fugitive emissions from the remaining transmission components used to provide Meter Run services and the estimated volume from pipeline blowdown emissions during maintenance and repair activities.
3. Estimate toxic air contaminants (TACs) and greenhouse gases (GHGs) associated with the natural gas volumes described above.

Criteria Pollutant Estimate: Portable Diesel Emergency Generator

The Ventura Compressor Station uses a portable emergency generator to provide backup power during facility outages. The emergency generator will be providing backup power to the communications shelter located at the site to ensure that communications and control functions pertaining to the gas transmission North Coastal System pressures and flows are reliably monitored and maintained by SoCalGas during a power outage. This engine will remain at the facility if any alternative site is selected. Combustion emissions from the portable diesel emergency generator were estimated using a standard Ventura County Air Pollution Control District (VCAPCD) permitting calculation methodology.

² The “Meter Run” is a system of piping manifolds and valves that allows SoCalGas to control the system pressure differential and flow delivery from north to south, such as when La Goleta Storage Field is withdrawing gas from and supplying gas to the Los Angeles Basin.

A permit application was recently submitted for the permanent use of a new trailer-mounted Kubota emergency diesel-fired U.S. Environmental Protection Agency Certified Tier 4 Final engine-driven generator rated at 48.3 HP to replace the previous 68 HP diesel-fired emergency generator. The operating parameters for the portable generator are provided in Table 2-8, below. Under VCAPCD Rule 23.D.6, internal combustion engines rated below 50 HP are normally exempt from permitting; however, a permit application was submitted to ensure continued compliance with VCAPCD’s Rule 35 elective emission limits. The annual criteria pollutant emissions (pounds per year) were calculated based on the annual schedule of 100 hours per year. These emissions are minimal and are shown in Table 2-9, below.

TABLE 2-8
Portable Diesel Emergency Generator Operating Parameters

Parameter	Value	Units
Engine Rating	48.3	BHP
Hourly Schedule	1	Hours/Day
Worst-Case Daily Schedule	24	Hours/Day
Annual Schedule	100	Hours/Year

Notes: BHP = brake horsepower.

TABLE 2-9
Portable Diesel Emergency Generator Criteria Pollutant Emissions

Pollutant	Emission Factor (g/BHP-hr)	Hourly (lb/hr) ^a	Annual (lb/yr) ^b
VOC	0.12	0.01	1.27
NOx	2.27	0.24	24.14
CO	0.03	0.003	0.32
PM	0.002	0.0002	0.02
SOx	0.006	0.001	0.059

Notes: g/BHP-hr = grams per brake horsepower-hour; lb/hr = pounds per hour; lb/yr = pounds per year; VOC = volatile organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide; PM = particulate matter; SOx = sulfur oxides.

^a Hourly (lb/hr) = 48.3 BHP × Emissions Factor (g/BHP-hour) / 453.6 g/lb.

^b Annual (lb/yr) = hourly (lb/hour) × 100 hours.

Natural Gas Volume Estimate: Component Fugitives

If an alternative site is selected and the Ventura Compressor Station is decommissioned, only transmission components (e.g., pipelines, valves, flanges, connectors, meters, pigging equipment) used for Meter Run services would remain at the facility. The volume of natural gas emitted from these remaining components was estimated using Senate Bill (SB) 1371 Natural Gas: Leakage Abatement data and historical California Air Resources Board (CARB) Oil and Gas (O&G) Leak Detection and Repair (LDAR) Inspection Records, and is the same

methodology used in CPUC Deficiency Request (DR) Question No. 17, Component Fugitives.³ To comply with SB 1371 requirements, SoCalGas reports Ventura Compressor Station’s annual natural gas volumes from compressor and component fugitive leaks to CPUC and CARB. The calculated average natural gas volume from fugitive leaks, including those associated with compressor operations, is 61.49 thousand standard cubic feet per year (MSCF/year) using the Emission Year 2021 and Emission Year 2022 SB 1371 Annual Report, Transmission Compressor Station: Compressor and Component Fugitive Leaks data table. The average number of components inspected for fugitive leaks is approximately 3,263, calculated using 2021 and 2022 CARB O&G LDAR Inspection Records (Table A4). SoCalGas estimates that the number of components that would remain if the existing compressors were decommissioned would be approximately 1,519, representing only 46.5 percent of the original component count. Based on this reduced component count, the volume of fugitive natural gas emitted from the remaining transmission components was estimated to be 28.62 MSCF/year, as shown in Table 2-10.

TABLE 2-10
Estimated Component Fugitive Volumes from Remaining Facility

Data	2021	2022	Average Data	Other
Fugitive LDAR Component Count	3,266	3,261	3,263	N/A
SB 1371 Component Fugitive Volume (MSCF/year) ^a	48.49	74.50	61.49	N/A
Estimated Remaining Facility Component Count	N/A	N/A	1,519	46.5% ^b
Estimated Total (MSCF/year)				28.62^c

Notes: LDAR = Leak Detection and Repair; N/A = not applicable; SB = Senate Bill; MSCF/year = thousand standard cubic feet per year.

^a The reported historical volume is from the 2021 and 2022 SB 1371 Annual Reports submitted on June 15, 2022, and June 15, 2023, respectively.

^b SoCalGas divided the estimated remaining component count (1,519) by the original component count (3,263) and multiplied by 100% to determine the percentage of remaining components.

^c The historical volume of 61.49 MSCF/year was multiplied by the percentage of remaining components (46.5%) to estimate the remaining facility volume (MSCF/year).

Natural Gas Volume Estimate: Transmission Pipeline Blowdowns

If an alternative site is used, transmission pipelines would remain within the facility boundary and there is a potential for pipeline blowdowns to occur during maintenance or repair activities. SoCalGas cannot predict where the pipeline blowdown emissions will occur for a given operations and maintenance activity; therefore, assuming blowdowns will occur within the facility boundary is highly speculative.⁴ Therefore, SoCalGas cannot accurately estimate pipeline blowdown emissions within the facility boundary and for the purposes of this exercise assumes they are zero.

³ Response to the CPUC DR Area No. 2, DR Nos. 17 and 18, on the PEA for the Ventura Compressor Modernization Project submitted on October 11, 2024.

⁴ Please note that for baseline years 2021 and 2022, there were no reported pipeline blowdown activities within the Ventura Compressor Station area code. As a result, these emissions were not included in CPUC DR Nos. 17 and 18.

Finally, the use of isolation and blowdown valves, cross compression, and other enhanced maintenance considerations have greatly reduced potential vented emissions associated with blowdowns.

GHG Emission Estimates

To estimate the facility GHG emissions if the site is decommissioned, SoCalGas used the component fugitive volume of natural gas and converted it to metric tons of carbon dioxide equivalent (MTCO_{2e}). This is the same methodology that was used in response to the CPUC DR Question No. 17, Greenhouse Gas Emission Calculations.⁵ Based on this approach, total GHG emissions were estimated to be approximately 13 MTCO_{2e}/year, as shown in Table 2-11.

TABLE 2-11

Estimated Greenhouse Gas Emissions (MTCO_{2e}) from Remaining Facility Components

Greenhouse Gas	Component Fugitives
NG Volume(MSCF/Year)	28.62
NG Volume (SCF/Year)	28,623
Mole Fraction Carbon Dioxide (CO ₂) ^a	0.0091
Mole Fraction Methane (CH ₄) ^a	0.9407
CO ₂ Volume (SCF) ^b	260.47
CH ₄ Volume (SCF) ^c	26,925.56
Density CO ₂	0.0526
Density CH ₄	0.0192
Global Warming Potential (GWP) CO ₂	1
GWP CH ₄ ^d	25
MTCO ₂ /Year ^e	0.01
MTCH ₄ /Year ^f	0.52
MTCO _{2e} /Year ^g	12.9
Total (MTCO _{2e} /Year)	13

Notes: MTCO_{2e} = metric tons carbon dioxide equivalent; NG = natural gas; MSCF/year = thousand standard cubic feet per year; SCF = standard cubic feet.

^a Average mole fractions based on continuous Gas Control data.

^b Converted NG (SCF) volume to CO₂ volume (SCF) = NG volume (SCF) × CO₂ (mole).

^c Converted NG (SCF) volume to CH₄ volume (SCF) = NG volume (SCF) × CH₄ (mole).

^d GWP for methane from the CARB required reporting value based on the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report.

^e Metric tons of CO₂ (MTCO₂) = CO₂ Volume (SCF) × Density (CO₂) × 10⁻³.

^f Metric tons of CH₄ (MTCH₄) = CH₄ Volume (SCF) × Density (CH₄) × 10⁻³.

^g Metric tons of CO₂ equivalent (MTCO_{2e}) = (MTCO₂ × GWP[CO₂]) + (MTCH₄ × GWP[CH₄])

⁵ Response to the CPUC DR Area No. 2, DR Nos. 17 and 18, on the PEA for the Ventura Compressor Modernization Project submitted on October 11, 2024.

Toxic Air Contaminants (TAC) Estimates

To estimate the facility TAC emissions if the site is decommissioned, SoCalGas used the same methodology as the response to the CPUC DR Question No. 17, TAC Emissions Calculations.⁵ The calculations are based on sampled natural gas analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) according to U.S. Environmental Protection Agency Method TO-15. The estimated TAC emissions for the decommissioned facility are shown in Table 2-12.

TABLE 2-12
Estimated TAC Emission Rates from Remaining Facility Components

Fugitive Components			
TAC	CAS NO.	Maximum Hourly Emissions (lb/hr)^a	Annual Emissions (lb/yr)^b
Benzene	71432	1.04E-06	9.14E-03
Toluene	108883	1.49E-06	1.31E-02
Ethylbenzene	100414	8.79E-08	7.70E-04
Xylenes	1330207	6.57E-07	5.76E-03

Notes: TAC = toxic air contaminant; lb/hr = pounds per hour; lb/yr = pounds per year.

^a Maximum hourly emissions (lb/hr) = maximum hourly emissions (MSCF/hr) / 1,000 × emission factor (lb/MMSCF). The numbers shown in this table are calculated by spreadsheet and may differ from hand-calculation due to rounding.

^b Annual emissions (lb/yr) = annual emissions (MSCF/yr) / 1,000 × emission factor (lb/MMSCF). The numbers shown in this table are calculated by spreadsheet and may differ from hand calculation due to rounding.

2.4 Biological Resources

Please provide a Biological Resources Technical Report (BRTR) for each of the three site alternatives, consistent with the information provided for the VCM Project in the PEA and with the BRTR standards identified in Attachment 2 of the PEA Checklist.

Please also provide the biological resources GIS data for the VCM Project and alternative sites, including any vegetation mapping, special-status species locations and critical habitat, and jurisdictional wetlands and waters.

RESPONSE

A Biological Resources Technical Report has been prepared for the Devil’s Canyon Road Site consistent with the standards identified in Attachment 2 of the PEA Checklist and is included as Appendix 2-F. The GIS data for both the VCM Project and the Devil’s Canyon Road Site Alternative have been submitted as Attachment 2-C, which includes both KMZ and SHP files.

2.5 Cultural Resources

Please provide a Cultural Resources Inventory Report and a Tribal Consultation Report for each of the three site alternatives, consistent with the information provided for the VCM Project in the PEA and with Cultural Resource Technical Report standards identified in Attachment 3 of the PEA Checklist.

RESPONSE

A Cultural Resources Inventory Report has been prepared for the Devil’s Canyon Road Site per the standards identified in Attachment 3 of the PEA Checklist. The Cultural Resources Inventory Report is included as Appendix 2-G to this document.

In addition, a Tribal Consultation Report was prepared for the Devil’s Canyon Road Site. The Tribal Consultation Report is included as Appendix 2-H to this document.

2.6 Geology, Soils, and Paleontological Resources

For each of the three site alternatives, please include the following information (see Responses to Sections 2.6.1 and 2.6.2):

- 2.6.1 Please identify and describe soil types for each alternative site and provide preliminary geotechnical requirements to identify anticipated geotechnical hazards, seismic hazards, and subsurface conditions at the alternative sites. This information should identify any conditions that would potentially require geotechnical and engineering design measures to reduce impacts.**

RESPONSE

This response provides a summary of soil types, anticipated geotechnical and seismic hazards, and subsurface conditions for the Devil’s Canyon Road Site. The response is based on a desktop review and preliminary geotechnical assessment conducted by Geosyntec Consultants (2025) and Burns & McDonnell (2025), which are included as Appendix 2-I and Appendix 2-J, respectively. The Geosyntec and Burns & McDonnell reports, in combination, emphasize the different geotechnical aspects of the Devil’s Canyon Road Site. As such, portions of the analysis from each report were used to develop the response below. Both reports recommend that comprehensive, site-specific geotechnical investigations be completed at the site prior to final design.

General Site Conditions

The Devil’s Canyon Road Site is located approximately 6,000 feet north of the existing Ventura Compressor Station on the west side of the Highway 33 corridor in Ventura County, California. The site is an existing brownfield oil extraction area situated within the alluvial valley of the Ventura River. The Devil’s Canyon Road Site is relatively flat and is bounded by the Ventura River to the south and east and by foothills containing active oil fields to the north and west (Appendix 2-J, p. 1).

The proposed Devil’s Canyon Road Pipeline Alignment is approximately 0.96 miles in length and runs primarily north–south. The alignment is composed of two pipelines: one for suction and one for discharge. The pipeline extends from an existing natural gas transmission pipeline to the proposed Devil’s Canyon Road Site compressor station. The Ventura River runs to the south and east of the alignment. Avocado farms and active oil fields lie to the north and west. Much of the proposed alignment runs along existing service roadways, such as Devil’s Canyon Road. Ground elevation along the Devil’s Canyon Road alignment varies significantly, with approximately 140 feet of elevation loss over 0.15 miles immediately north of the southern terminus. The ground’s

elevation then rises in two distinct steps, regaining about 90 feet of elevation before gradually decreasing to the north until the pipeline reaches the proposed compressor station tie-in. Slopes range from 5 percent to 50 percent along the alignment (Appendix 2-J, p. 2).

The proposed Cable Canyon Road Pipeline Alignment is approximately 1.9 miles in length. The alignment is composed of two pipelines: one for suction and one for discharge. The pipeline extends from an existing natural gas transmission pipeline on Taylor Ranch Road to the proposed Devil’s Canyon Road Site compressor station. Much of the proposed alignment runs along the existing Cable Canyon service roadway, through active oil fields north and west of the proposed Devil’s Canyon Road Site compressor station. Ground elevation along the Cable Canyon Road Pipeline Alignment is variable, with approximately 140 feet of elevation change along the proposed route. Slopes range from 5 percent to 50 percent along the alignment (Appendix 2-J, pp. 2–3).

Seismic Hazards

Faulting

The Devil’s Canyon Road Site is located in a seismically active region of Southern California. Faults in California are generally classified as “Holocene-active,” “Pre-Holocene active,” and “age-undetermined.” The division of these major groups is based on criteria by the California Geological Survey (CGS) for the Alquist–Priolo Earthquake Fault Zoning Program, summarized below (from CGS’s 2018 Earthquake Fault Zones: A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California; available at <https://www.conservation.ca.gov/cgs/publications/sp42>):

- Holocene-active faults are faults that have moved during the past approximately 11,700 years. These faults, which are also known as active faults, are capable of surface rupture.
- Pre-Holocene faults are faults that have not moved in the past 11,700 years. These faults, which are also known as potentially active faults, may be capable of surface rupture, but are not regulated under the Alquist–Priolo Earthquake Fault Zoning Act of 1972 (Alquist–Priolo Act).
- Age-undetermined faults are faults where the recency of fault movement has not been determined (CGS 2018). These faults are also known as “inactive faults.”

This fault classification is consistent with criteria of the Alquist–Priolo Act. The Alquist–Priolo Act regulates development near Holocene-active faults to mitigate the hazard of surface fault rupture. The Alquist–Priolo Act requires the State Geologist to establish regulatory zones, known as Alquist–Priolo Earthquake Fault Zones (Alquist–Priolo Zones), around the surface traces of Holocene-active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones. The Devil’s Canyon Road Alternative Site is not located within a currently established Alquist–Priolo Zone for surface fault rupture hazard.

The Red Mountain Fault Zone and Ventura Fault are the closest major Holocene-active faults to the Devil’s Canyon Road Alternative Site. The Red Mountain Fault Zone is a well-constrained series of reverse faults that trend south from Ojai Valley, continue northwest subparallel to the Pacific Ocean coastline, and extend offshore south of Carpinteria. The Ventura Fault is a well-constrained, north-dipping, reverse fault that extends approximately 8.1 miles east from the

Pacific Ocean along the southern base of Ventura’s foothills. The closest pre-Holocene fault to the Devil’s Canyon Road Alternative Site includes a moderately constrained unnamed fault that extends 2.3 miles west from the foothills of northern Ventura through the Devil’s Canyon Road Alternative Site. Distances to regional faults and the mean 30-year participation probability are shown in Table 2-13.

TABLE 2-13
Summary of Nearby Faults

Fault	Distance from Devil’s Canyon Road Alternative Site (Miles) ^a	Mean 30-Year Participation Probability (%) ^b			
		M ≥ 6.7	M ≥ 7.0	M ≥ 7.5	M ≥ 8.0
Unnamed fault in California	0	NR	NR	NR	NR
Ventura–Pitas Point	2.1	1.42	1.40	0.97	<0.01
Red Mountain Fault Zone (South Strand)	5.1	3.00	2.42	0.13	NR
Javon Canyon	5.1	NR	NR	NR	NR
Sisar	5.7	0.60	0.60	0.53	<0.01
Faults near Oakview and Meiners Oaks	5.9	NR	NR	NR	NR
San Cayetano	12.3	1.69	1.58	0.82	<0.01
Santa Ynez	13.4	1.37	1.30	0.54	NR
Mission Ridge Fault System (Mission Ridge Section)	19.2	0.64	0.59	0.49	NR
Pine Mountain	19.9	0.42	0.24	0.04	NR
Oak Ridge (Barksdale Section)	20.1	1.90	1.54	1.05	<0.01
Big Pine Fault Zone	24.7	0.32	0.15	0.05	NR
Northridge	34.5	0.85	0.79	0.50	<0.01
San Gabriel Fault Zone	36.7	0.59	0.57	0.52	0.03
San Andreas Fault Zone	38.4	17.03	16.97	16.82	6.61

Source: Appendix 2-I.

Notes: NR = not reported.

^a Distances from site noted are the closest distances to the surface trace or inferred projection of the fault as measured from mapped traces in the 2017 U.S. Geological Survey Quaternary Fault and Fold Database of the United States (available at <https://www.usgs.gov/programs/earthquake-hazards/faults>).

^b As reported by the Uniform California Earthquake Rupture Forecast, Version 3 (UCERF3)—The Time-Independent Model (USGS Open-File Report 2013–1165; CGS Special Report 228; Southern California Earthquake Center Publication 1792; available at <https://pubs.usgs.gov/of/2013/1165/>).

Fault Rupture and Strong Ground Shaking

Seismically induced fault surface rupture occurs as the result of differential movement across a fault that propagates to the ground surface. The potential for fault surface rupture is generally considered to be significant along Holocene-active faults and to a lesser degree along Pre-Holocene-active faults. As mentioned above, a pre-Holocene, moderately constrained unnamed fault extends 2.3 miles west from the foothills of northern Ventura through the Devil’s Canyon Road Site.

Although the unnamed fault is considered a potential source for fault-related ground rupture by definition, given the “Pre-Holocene-active” designation, no readily available information regarding the unnamed fault is available. Furthermore, the unnamed fault segment is not mapped as being laterally continuous beyond the limits of the Ventura River Valley and is not identified in other published geologic maps or within the CGS earthquake hazard maps; therefore, it may be representative of a non-seismic lineament such as the Ventura anticline, which extends along a similar trend as the unnamed fault. Given the lack of additional information and other stated observations described herein, the potential for fault-related ground rupture associated with the unnamed fault or other nearby faults is considered low (Appendix 2-I, p. 5). However, the Devil’s Canyon Road Site and the Devil’s Canyon Road and Cable Canyon Road Pipeline Alignments have a high likelihood of experiencing strong ground shaking (Appendix 2-J, pp. 7–8 and p. 10).

Secondary Seismic Effects

Liquefaction

Liquefaction occurs primarily in saturated, loose, fine- to medium-grained soils in areas where the groundwater table is within approximately 50 feet of the surface. Shaking causes the soils to lose strength and behave like a liquid. Excess water pressure is vented upward through fissures and soil cracks and can also result in a water–soil slurry flowing onto the ground surface. Liquefaction-related effects include loss of bearing strength, ground oscillations, lateral spreading, and flow failures or slumping. “Lateral spreading” is the lateral movement of gently to steeply sloping saturated soil deposits that are caused by earthquake-induced liquefaction. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases.

According to the CGS Earthquake Zones of Required Investigation, Ventura Quadrangle, the Devil’s Canyon Road Site is located within a mapped liquefaction zone. Based on groundwater data obtained from the California Department of Water Resources, depth to water table estimates, and the proximity to the Ventura River, it is expected that groundwater is moderately shallow (10 feet below ground surface to 20 feet below ground surface) at the site. Therefore, the liquefaction potential at the Devil’s Canyon Road Site is considered moderate; however, Geosyntec recommends obtaining site-specific subsurface data to provide a more accurate geotechnical design (Appendix 2-I, p. 6). Additionally, parts of the Devil’s Canyon Road Pipeline and Cable Canyon Road Pipeline are within areas susceptible to liquefaction (Appendix 2-J, pp. 9 and 11).

Seismically Induced Slope Failure

Landslides within the Ventura area are abundant due to rapid uplift and deformation of sedimentary formational deposits that range greatly in consistency from unconsolidated to well indurated. Specific formational units such as the Santa Barbara and Pico Formations are typically more prone to landsliding following periods of above-average rainfall or seismic shaking from near or more distant seismic sources.

According to CGS’s 2003 Seismic Hazard Zone Report for the Ventura 7.5-Minute Quadrangle, Ventura County, California (available at <https://maps.conservation.ca.gov/cgs/information/warehouse/eqzapp/>), the Devil’s Canyon Road Site is not located within mapped landslide zones, and due to the relatively flat conditions, the risk of slope instability associated with landslides is considered low. However, the north and west upslopes and geologic units near the Devil’s Canyon Road Site are noted as highly to extremely susceptible to landsliding (Appendix 2-J, p. 7). The Devil’s Canyon Road Pipeline Alignment and the Cable Canyon Road Pipeline Alignment do not intersect any known active or recent landslides; however, some geological units along the alignments are noted as being extremely susceptible to landslides (Appendix 2-J, pp. 8 and 10).

Rockfall hazards are typically associated with unstable rock outcrops on steep terrain that undergo climatic or biological changes, which include pore pressure, freeze–thaw cycles, root growth, and weathering. Topography within the Devil’s Canyon Road Site’s mapped buffer zone does not include slopes that exceed 60 degrees; therefore, the risk of rockfall hazards is considered low (Appendix 2-I, pp. 5–6).

Geologic Units

Stratigraphy

The Devil’s Canyon Road Site consists of undivided alluvial and colluvial deposits (unconsolidated sandy clay with gravel), underlain by sedimentary bedrock at depths typically greater than 6 feet below ground surface (Appendix 2-J, p. 4). The subsurface bedrock is primarily sedimentary, consisting of sandstone, siltstone, shale, and conglomerate, including Santa Barbara claystone and the Pico Formation (Appendix 2-J, p. 4). The Cable Canyon Road Pipeline Alignment consists of similar surficial deposits (Holocene alluvial/colluvial, Pico Formation, and stream terrace deposits), underlain by bedrock with varying depths of 4 feet to 6 feet below ground surface, and in some areas greater than 6 feet below ground surface (Appendix 2-J, p. 4). The Devil’s Canyon Road Pipeline Alignment contains Las Posas sandstone, active wash deposits, Holocene alluvial/colluvial deposits, stream terrace deposits, and Pico Formation, and is underlain by bedrock with varying depths of 3 feet to 6 feet below ground surface, and in some areas greater than 6 feet below ground surface (Appendix 2-J, p. 4).

Slope Stability

Ground elevation along the Devil’s Canyon Road Site alignment varies significantly, with approximately 140 feet of elevation loss over 0.15 miles immediately north of the southern terminus. The ground’s elevation then rises in two distinct steps, regaining about 90 feet of

elevation before gradually decreasing to the north until the pipeline reaches the proposed compressor station tie-in. Slopes range from 5 percent to 50 percent along the alignment (Appendix 2-J, p. 2).

The Devil’s Canyon Road Site is located adjacent to a steeply sloped area identified as having high landslide potential (>15 percent). Grading activities at the site are not expected to impact the known landslide risks nearby; however, sections of the proposed pipeline alignments are located within steeply sloped areas identified as having high landslide potential (>15 percent). The alignments also span earthquake-induced landslide zones. The pipelines may be negatively impacted by slope failures directly along the proposed alignments (leading to direct damage of the pipelines) or may be impacted by a slope failure (blocked access roads) (Appendix 2-J, p. 13).

As mentioned above, the Devil’s Canyon Road Pipeline Alignment and the Cable Canyon Road Pipeline Alignment do not intersect any known active or recent landslides; however, some geological units along the alignments are noted as being extremely susceptible to landslides (Appendix 2-J, pp. 8 and 10). These pipelines’ alignments’ susceptibility to landslides would be determined during a detailed geotechnical investigation, including seismic/landslide mapping. The topography of the Devil’s Canyon Road Site does not include slopes that exceed 60 degrees; therefore, the risk of rockfall hazards is considered low (Appendix 2-I, p. 5).

Subsidence

“Subsidence” is the permanent collapse of the pore space within a soil or rock and downward settling of the earth’s surface relative to its surrounding area. Subsidence can result from the extraction of water or oil, the addition of water to the land surface—a condition called “hydrocompaction”—or peat loss. The compaction of subsurface sediment caused by the withdrawal or addition of fluids can cause subsidence. Land subsidence can disrupt surface drainage; reduce aquifer storage; cause earth fissures; damage buildings and structures; and damage wells, roads, and utility infrastructure. Several areas within Ventura County are experiencing subsidence due to groundwater extraction, including the Oxnard Plain, the Las Posas Valley, and the Santa Clara River Valley (County of Ventura GIS’s 2020 mapping of the County, available at <https://maps.ventura.org/countyview/>). According to the USGS Survey Areas of Land Subsidence in California map (available at https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html), there have been no recorded instances of subsidence at the Devil’s Canyon Road Site and along the proposed pipeline alignments associated with groundwater pumping, peat loss, or oil extraction.

Expansive Soil

Expansive soils are clay-rich soils that expand when water is added and shrink when dry. This continuous change in soil volume can cause foundations to move unevenly and crack. Potentially compressive and unsuitable materials in surficial soils may be present along the Devil’s Canyon Road Site and the two pipeline alignments. For shallow foundations, depending on the severity of the compressibility/shrink–swell potential, additional mitigation measures may be required, such as over-excavation and replacement. If deep foundations are required, increased embedment depths may be needed (Appendix 2-J, p. 16).

Tsunamis and Flooding

The likelihood of flooding in the Devil’s Canyon Road Site and Cable Canyon Road Pipeline areas is low. The Devil’s Canyon Road Site and Cable Canyon Road Pipeline area are designated as Zone ‘X,’ which is an area of minimal flood hazard according to FEMA (Appendix 2-J, pp. 7 and 11). Most of the Devil’s Canyon Road Pipeline falls within the FEMA Zone ‘X’ designation; however, FEMA Zone “AE,” which indicates a Special Flood Area with Base Flood Elevation between 73 and 77 feet above mean sea level, directly abuts part of the alignment (Appendix 2-J, p. 9). The likelihood of tsunamis occurring on the site and proposed pipeline sites are low. The Devil’s Canyon Road Site and proposed pipeline sites are outside any mapped tsunami hazard areas (Appendix 2-J, pp. 7, 9, and 11).

Soils

Soil types at the Devil’s Canyon Road Site generally consist of undivided Holocene alluvial and colluvial deposits (Qha), which are typically encountered on the floors of valleys and in hill slope areas. These deposits typically consist of unconsolidated sandy clay with varying amounts of gravel (Appendix 2-J, p. 3).

The Devil’s Canyon Road Pipeline Alignment crosses through five recorded geologic units. Starting from the southern terminus and moving northward, the proposed alignment crosses the Pleistocene Las Posas sandstone, composed of weakly indurated sand with some gravelly sand units (Qlp); active wash deposits within major river channels, composed of unconsolidated sand, gravel, and silts (Qw); undivided Holocene alluvial, colluvial, and active stream deposits on the floors of valleys, composed of unconsolidated sandy clay with some gravel (Qha); undivided Pleistocene stream terrace deposits, consisting of clay, sand, gravel, cobbles, and some boulder-sized materials (Qpt); and the Pliocene undivided Pico Formation, which is composed of claystones, siltstones, and sandstones and is locally pebbly (Tp). The Cable Canyon Road Pipeline Alignment crosses through three recorded geological units. The alignment primarily resides within undivided Holocene alluvial, colluvial, and active stream deposits on the floors of valleys (Qha), occasionally intersecting the Pico Formation (Tp) and undivided Pleistocene stream terrace deposits (Qpt) (Appendix 2-J, p. 4).

Please refer to Appendices 2-I and 2-J for the geotechnical assessments for the Devil’s Canyon Road Site prepared by Geosyntec and Burns & McDonnell, respectively.

2.6.2 Please provide a Paleontological Resources Inventory Report at similar level of detail as provided for the VCM Project.

RESPONSE

Please see Appendix 2-K for the Paleontological Resources Inventory Memorandum (both public and confidential versions) for the Devil’s Canyon Road Site.

2.7 Hydrology, Water Quality, and Groundwater

Please provide a summary of hydrology drainage plans applicable to each alternative site, including an identification of the stormwater management methods likely to be feasible for each alternative site. This information should provide a qualitative evaluation of drainage impacts for each alternative site relative to the VCM Project Site.

RESPONSE

The Devil’s Canyon Road Site has been previously graded and developed and currently supports an oil operations facility operated by Aera Energy LLC with multiple active wells. The on-site slope ranges from a low of 0 percent to a high of more than 30 percent, with a site average of approximately 6 percent. Construction of the Devil’s Canyon Road Site Alternative could increase runoff due to new impervious surfaces. No grading or earthwork would be required at the staging area, which would be used only as a temporary laydown yard for construction equipment.

Construction

Construction activities at the Devil’s Canyon Road Site would be required to comply with numerous hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including into stormwater or nearby surface water bodies. Compliance with the State Water Resources Control Board regulations requires preparation and implementation of a SWPPP, in accordance with the National Pollutant Discharge Elimination System Construction General Permit (CGP). The SWPPP must include best management practices (BMPs), including erosion control measures and proper handling of petroleum products, such as proper petroleum product storage and spill response practices, to prevent pollution in stormwater discharge during construction activities.

Operations

The Devil’s Canyon Road Site is subject to the requirements in the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (2025 Reissuance; available at <https://vcstormwater.org/publications/manuals/tech-guide-manual/>), which requires that the selection of Stormwater BMP Design for new development and redevelopment projects prioritize on-site infiltration, bioretention and/or rainfall harvest and use unless it is technically infeasible. The Devils Canyon Road Site is an active oil operations facility operated by Aera Energy LLC. Current uses include oil wells and oil storage facilities. There are currently four existing wells that are inside the facility boundary and nine existing oil wells in the temporary staging area. See Devil’s Canyon Road Site Drawings 152084-3004-D-SKT, Conceptual Plot Plan with Wells, and 152084-7025-D-SKT, Conceptual Temporary Staging Area Grading Plan, for details (refer to Appendix 2-A to this document). No environmental site assessment, geotechnical investigation, or topographic survey has been performed at the Devil’s Canyon Road Site to determine soil type, potential soil/groundwater contamination, depth to groundwater, or surface drainage. As such, the current assumption is that the presence of existing oil wells may have resulted in

existing soil and/or groundwater contamination or could result in soil/groundwater contamination in the future.

The 2025 Ventura County Technical Guidance Manual states that one of the conditions for technical infeasibility is due to brownfield development sites where infiltration poses a risk of causing pollutant mobilization. Because there is a potential for contaminated soil or groundwater at the Devil’s Canyon Road Site, the use of infiltration basins is precluded. A lined detention basin that is sized to hold the Stormwater Quality Design Volume runoff would be constructed at the site. The discharge from the basin would be routed through proprietary prefabricated filter units that meet the requirements of the Ventura County Technical Guidance Manual. The discharge would then be routed to the existing County stormwater sewer and the nearby Ventura River. See Devil’s Canyon Road Site Drawings 152084-3004-D-SKT, Conceptual Plot Plan with Wells, and 152084-7025-D-SKT, Conceptual Temporary Staging Area Grading Plan, for details (refer to Appendix 2-A to this document). The feasibility of using stormwater detention and treatment to control stormwater runoff would be subject to local permitting agency approval.

In compliance with the Ventura County Technical Guidance Manual, the amount of detained stormwater would be equal to the 85th percentile 24-hour runoff event, determined for the Devil’s Canyon Road Site as the maximized capture stormwater volume using a 48- to 72-hour drawdown time. As a result, stormwater runoff rates would be comparable to under existing conditions. Development of the Devil’s Canyon Road Site Alternative would not substantially alter the existing drainage of the site such that increased stormwater runoff rates would exceed the capacity of existing or planned stormwater drainage systems. In addition, proposed stormwater controls would prevent potential inundation of proposed storage tanks and hazardous materials/waste containers.

All hazardous materials would be stored in compliance with all applicable federal, state, and local regulations, and the waste materials would be transported off site as needed by a licensed contractor for proper treatment and disposal, thus minimizing the potential for spills and impacts to stormwater quality during operations. The facility would operate in accordance with a hazardous materials business plan and integrated stormwater/oil spill prevention and countermeasure plan.

Comparison to VCM Project

Impacts related to hydrology and water quality for the Devil’s Canyon Road Site Alternative would be greater for short-term construction impacts and similar for long-term operational impacts compared to the VCM Project. Impacts would be more widespread under the Devil’s Canyon Road Site Alternative because it would require site remediation and improvements off site that would not be required as part of the VCM Project. Based on a preliminary desktop assessment, the proposed methodology for stormwater management at the Devil’s Canyon Road Site is construction of a lined detention structure with filters to treat stormwater runoff at the site prior to it being released off site. This is the same design approach used for the VCM Project. In addition, similar to the VCM Project, a SWPPP would be developed and implemented during construction of the Devil’s Canyon Road Site Alternative in accordance with the Construction General Permit. The new compressor facility and off-site improvements would comply with all

hazardous storage regulations and would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality.

Please refer to Appendix 2-A for the Devil’s Canyon Road Site Drawings 152084-3004-D-SKT, Conceptual Plot Plan with Wells, and 152084-7025-D-SKT, Conceptual Temporary Staging Area Grading Plan.

2.8 Mineral Resources

Please provide a quantification of existing wells on the alternative sites. Please identify which wells, and how many, would be subject to decommissioning per each alternative.

RESPONSE

The CPUC has preemptive jurisdiction over the construction, maintenance, and operation of gas utility facilities in the state. Preemption of the Ventura County Non-Coastal Ordinance’s setback requirements from decommissioned or abandoned wells is assumed; therefore, a setback radius of between 10 and 25 feet has been assumed for all wells inside the Devil’s Canyon Road Site’s facility boundary for equipment arrangement and construction purposes.

Devil’s Canyon Road Site Facility Boundary

The preliminary desktop assessment has identified that four existing oil wells are inside the proposed compressor station facility boundary at the Devil’s Canyon Road Site, as summarized in Table 2-14, below. All four wells need to be decommissioned or re-abandoned to current CalGEM requirements.⁶

TABLE 2-14

Oil Wells Within the Devil’s Canyon Road Site Alternative Facility Boundary

Sequential No.	Site	Well Designation	Well Status	Well Type
1	Devil’s Canyon Road	Taylor 784	Active	Oil & Gas
2	Devil’s Canyon Road	Taylor 816	Idle	Waterflood
3	Devil’s Canyon Road	Taylor 42	Active	Oil & Gas
4	Devil’s Canyon Road	Taylor 43	Active	Oil & Gas

Gas Pipeline Corridor

There are 48 existing oil wells in close proximity to the Devil’s Canyon Road Site’s gas pipeline corridor disturbance areas; however, only 2 of these oil wells would need to be decommissioned and 5 would need to be re-abandoned for the new gas pipelines routes and access roads, as

⁶ Per CalGEM, “decommissioning” is defined as the process of safely dismantling and removing an oil production facility or related infrastructure and restoring the site to its original condition. “Abandonment” is defined as the permanent closure and sealing of the wellbore of an oil gas well

summarized in Table 2-15, below. Of these 7 oil wells, 1 is identified as being on Cable Canyon Road and 6 are on Devil’s Canyon Road.

TABLE 2-15
Oil Wells Within the Gas Pipeline Corridor

Sequential No.	Site	Well Designation	Well Status	Well Type
1	Cable Canyon Road	Taylor 49	Plugged & Abandoned	Oil & Gas
2	Devil’s Canyon Road	Taylor 376	Plugged & Abandoned	Water Source
3	Devil’s Canyon Road	Taylor 52	Plugged & Abandoned	Oil & Gas
4	Devil’s Canyon Road	Taylor 193	Active/Idle	Waterflood
5	Devil’s Canyon Road	Taylor 569	Plugged & Abandoned	Oil & Gas
6	Devil’s Canyon Road	Taylor 615	Plugged & Abandoned	Oil & Gas
7	Devil’s Canyon Road	Taylor 395	Active/Idle	Oil & Gas

Temporary Staging Area

The assumption at this time is that the existing oil wells located in the temporary staging areas for the Devil’s Canyon Road Site Alternative would not require decommissioning. However, this would need to be validated with CalGEM in the subsequent phases of the project.

Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-3004-D-SKT, Conceptual Plot Plan with Wells; 152084-7025-D-SKT, Conceptual Temporary Staging Area Grading Plan; and 152084-7028-D-SKT, Conceptual Pipeline Route with Wells.

2.9 Noise

For each of the three site alternatives, please include the following information (Sections 2.9.1–2.9.3):

2.9.1 Please list and map all sensitive receptors within one mile of each alternative compressor station site and tabulate the distances of noise sensitive areas from the sites.

RESPONSE

Sensitive land uses are generally defined as locations where people reside or where the presence of noise could adversely affect the use of the land. The Devil’s Canyon Road Site is within the County of Ventura; however, the majority of the sensitive receptors are within the City of Ventura. The County defines noise-sensitive uses as generally including those land uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element

of their intended purpose. These uses include residences; schools; nursing homes; historic sites; cemeteries; parks, recreation, and open space areas; hospitals and care facilities; hotels and other short-term lodging (e.g., bed and breakfasts, motels); places of worship; and libraries. The City defines noise-sensitive properties as residences; schools; hospitals; and convalescent care, boarding, and rest homes, regardless of the underlying zoning.

The 1,140 noise-sensitive properties within 1 mile of the Devil’s Canyon Road Site are listed in Appendix 2-L, including information on location, land use, and distance from the alternative site. Figure 1 in Appendix 2-L displays these same noise sensitive properties.

Please refer to Appendix 2-L, Noise Sensitive Receptors, for information on and location of noise-sensitive receptors near the Devil’s Canyon Road Site.

2.9.2 Please provide a noise study for each alternative site, including measurement or estimation of the existing ambient sound environment based on current land uses and activities, and a quantification of noise levels during operation that could exceed pre-project conditions at the alternative sites.

RESPONSE

Please refer to Appendix 2-M for the noise study prepared for the Devil’s Canyon Road Site.

2.9.3 Will any existing noise sources remain over the long term at the original project site if an alternative site is used? If so, please identify these noise sources and quantify associated noise levels.

RESPONSE

SoCalGas anticipates that the following three noise sources will remain over the long term at the existing site if an alternative site is selected:

- Standby generator
- Air compressor
- Meter Run system

A noise study for the remaining long-term noise sources at the VCM Project Site was prepared and is included as Appendix 2-N to this document.

Please refer to Appendix 2-N for detailed information regarding long-term remaining noise sources at the Devil’s Canyon Road Site.

2.10 Transportation

Please provide the following information for each of the site alternatives (see Responses to Sections 2.10.1 and 2.10.2):

2.10.1 Expand the Summary of Baseline (2016) Vehicle Miles Traveled (PEA Table 5.17-1) to include each alternative site.

RESPONSE

As shown in Table 2-16, below (based on Table 5.17-1 from the PEA), the City of Ventura’s total work-based vehicle miles traveled (VMT) per employee is 17.37; the total work-based VMT per employee is 19.10 for the VCM Project Site’s Transportation Analysis Zone (TAZ); and the total work-based VMT per employee is 24.93 and 23.96 for the Devil’s Canyon Road Site’s two TAZs, which is similar to the total work-based VMT per employee for unincorporated Ventura County (23.98).

TABLE 2-16
Summary of Baseline (2016) Vehicle Miles Traveled by Project Site

Location	TAZ	Total Home-Based VMT/Capita	Total Work-Based VMT/Employee	Total VMT/Service Population
City of Ventura	N/A	11.79	17.37	26.66
Unincorporated Ventura County	N/A	20.78	23.98	31.21
Overall Ventura County	N/A	16.48	19.09	27.25
VCM Project Site	60008301	14.39	19.10	21.74
Alternative				
Devils Canyon Road Site	60002301	11.58	24.93	27.71
	60024201	23.20	23.96	27.27

Source: Ventura County Transportation Commission’s 2025 Ventura County Transportation Model, available at <https://www.goventura.org/work-with-vctc/traffic-model/>.

Notes: TAZ = transportation analysis zone; VMT = vehicle miles traveled; N/A = not applicable; VCM = Ventura Compressor Station Modernization.

2.10.2 Identify whether construction vehicle trips for each alternative site would be different from those of the VCM Project in PEA Table 5.17-3.

RESPONSE

As detailed in Table 2-17, below, Phases A1–A6 for the Devil’s Canyon Road Site would be in addition to the construction phases in the VCM Project. The total days of construction for each phase of the Devil’s Canyon Road Site Alternative are slightly different than those of the VCM

Project. As detailed in the VMT spreadsheet in Attachment 2-D, overall construction VMT for the Devil’s Canyon Road Site Alternative would be slightly less than that of the VCM Project.

TABLE 2-17**Daily One-Way Trips and VMT by Phase and Total VMT for Vendor/Worker Vehicles**

Phase No.	Work Description	No. of Daily One-Way Trips	Total Daily Phase VMT	Total VMT per Phase
A1	Site Assessment	16	160	2,240
A2	Soils Remediation	50	1,220	148,840
A3	Well Abandonment	149	2,480	441,440
A4	Off-site Laydown Development	29	290	13,920
A5	Gas Pipeline Installation	162	1,858	338,156
A6	Electrical Interconnect	48	655	44,540
1	Subsurface Exploration	41	575	27,600
2	Demo Existing Equipment & Piping	49	980	65,660
3	Site Preparation/Rough Grading	92	2,636	50,084
4	Foundations	94	1,270	220,980
5	Trenching/Undergrounds	57	867	50,286
6	Equipment, Structural Steel and Building Erection, and Piping	101	1,297	287,934
7	Electrical and Instrumentation	53	563	128,364
8	Paving	34	736	33,120
9	Painting/Insulation	13	427	18,361
10	Commissioning/Startup and Testing	43	529	61,364
11	Site Restoration	14	302	13,244
12	Decommissioning/Demolition	49	520	35,360

Note: VMT = vehicle miles traveled.

2.11 Utilities and Service Systems

Please provide the following information for each alternative (see Sections 2.11.1–2.11-3).

2.11.1 Description and quantification of the new gas pipelines/utilities to be installed as part of each alternative. Clarify if any of these would require relocation of existing utility infrastructure.

RESPONSE**Gas Pipeline**

The proposed facility at the Devil’s Canyon Road Site would require new natural gas transmission pipelines, which include two suction lines and two discharge lines that would tie

into the existing main transmission pipelines. One set of suction and discharge pipelines would run through Devil’s Canyon Road. A second set of suction and discharge pipelines would run through Cable Canyon Road. See Table 2-18, below, for size and length of the new pipelines. See Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan, in Appendix 2-A for pipeline alignment and transmission tie-in locations.

Water

The Devil’s Canyon Road Site is located within an oil processing operation. Based on available site photos taken in January 2022, a water main was identified near the east end of the Mill Canyon Road Bridge that crosses the Ventura River. The assumption was made that the Devil’s Canyon Road Site would connect to this water main. A new 6-inch-diameter water main is proposed from the roadway intersection to the site. At this point, there is not enough information to determine whether the available flow rate and pressure is sufficient for fire protection requirements. Therefore, a 150,000-gallon storage tank is proposed to be installed to provide sufficient water volume for fire protection requirements, pending further evaluations of the existing water infrastructure. See Table 2-18, below, for size and length of the new water line. See Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan, in Appendix 2-A for the waterline alignment and assumed tie-in location.

Wastewater

It is assumed the facility would connect to an existing sanitary sewer main along Devil’s Canyon Road. Refer to Table 2-18 below for size and length of the new wastewater line. See Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan, in Appendix 2-A for the wastewater (sewer) line alignment and assumed tie-in location.

Southern California Edison (SCE) Electrical Interconnection

The Devil’s Canyon Road Site Alternative would include installation of approximately 34 new poles to connect to the existing SCE Grandad circuit. No electrical substation is required for this alternative. See Devil’s Canyon Road Site Drawing 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan, in Appendix 2-A for the electrical line alignment, pole types, and assumed tie-in location. Reference Table 2-18, below, for the length of the new electrical interconnect. See also Devil’s Canyon Road Site Drawing 152084-5510-D-SKT, Electrical Distribution Interconnect Preliminary Details, in Appendix 2-A.

Mapping of Above and Below Ground Utilities

Based on a desktop study, there would be no interference with any existing public utilities. However, a site investigation would need to be done at a later stage to confirm if any gas or utility lines need to be relocated or abandoned.

Preliminary Quantification of Utility Lines

See Table 2-18 for preliminary sizes and lengths of the gas pipelines, waterline, wastewater line, and electrical interconnect. These values are approximations and will need to be validated and updated in future phases of design.

Please refer to Appendix 2-A for Devil’s Canyon Road Site Drawings 152084-7024-D-SKT, Conceptual Pipeline & Utility Plan, and 152084-5510-D-SKT, Electrical Distribution Interconnect Preliminary Details.

TABLE 2-18**Summary of New Utilities for Devil’s Canyon Road Site Alternative**

Utility	Size (Inches in Diameter)	Length (Feet)
Suction Gas Lines	20	14,800
Discharge Gas Lines	20	14,800
Water Line	6	1,150
Wastewater Line	4	1,150
Electrical Interconnect	N/A	8,200

Note: N/A = not applicable.

2.11.2 Quantify the amount of wastewater and solid waste that would be generated at each alternative site for both the construction phase and the operations and maintenance phase.

RESPONSE

The estimated amounts of wastewater and solid waste that would be generated for the Devil’s Canyon Road Site Alternative during both the construction phase and the operations and maintenance phase are provided below.

Construction Phase

The preliminary quantities for solid waste and wastewater for the Devil’s Canyon Road Site Alternative during construction are estimated in Table 2-19, below (originally from Table 5.19-5 in the PEA).

TABLE 2-19**Devil’s Canyon Road Site Construction Waste Estimates**

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Devil’s Canyon Road Site Alternative Estimated Total (Pounds)	Disposal Method
Pipeline & Electrical	Solid	Construction	Human Waste/ Refuse – Pipeline & Elec. Line	N/A	140,000	Portable Toilet Service Disposal

TABLE 2-19
Devil's Canyon Road Site Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Devil's Canyon Road Site Alternative Estimated Total (Pounds)	Disposal Method
Pipeline & Electrical	Solid	Construction	Post-Consumer Food Waste – Pipeline & Elec. Line	N/A	192	Landfill
Facility	Solid	Construction	Human Waste/ Refuse	720,000	720,000	Portable Toilet Service Disposal
Facility	Solid	Construction	Post-Consumer Food Waste	300	300	Landfill
Facility	Solid	Construction	Asphalt (Demo)	4,650,000	N/A	Landfill
Facility	Solid	Construction	Concrete (Demo)	440,000	80,000	Landfill
Facility	Solid	Construction	Building Materials (Wood, Lumber)	90,000	90,000	Landfill
Facility	Solid	Construction	Scrap Metals (Pipe, Steel, Hardware)	80,000	80,000	Metal Recycling
Facility	Solid	Construction	Plastics (Packaging/ Containers)	30,000	30,000	Recycling & Landfill
Facility	Solid	Construction	Oily Rags and/or Absorbents	350	350	Hazardous Waste Facility
Facility	Solid	Construction	Excavated Soils/ Boulders	40,430,000	40,430,000	Landfill

TABLE 2-19
Devil's Canyon Road Site Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Devil's Canyon Road Site Alternative Estimated Total (Pounds)	Disposal Method
Facility	Solid	Construction	Spent Sand Blasting Media	N/A	N/A	Landfill
Facility	Solid	Construction	Concrete (Washout)	150,000	150,000	Landfill
Wastewater Line	Solid	Construction	Packing/Cut Pipe Pieces	N/A	150	Landfill
Waterline	Solid	Construction	Ductile Iron Pipe Waste	N/A	100	Recycle
Waterline	Solid	Construction	Packing Materials (Wood Spacers/ Pallets/ Cardboard Boxes)	N/A	200	Landfill
Facility	Liquid	Construction	Paints	100	100	Hazardous Waste Facility
Facility	Liquid	Construction	Solvents	35	35	Hazardous Waste Facility
Facility	Liquid	Construction	Lubricating Oils	70	70	Hazardous Waste Facility
Facility	Liquid	Construction	Water	300,000	300,000	Drain On site
Pipeline	Liquid	Construction	Hydrotest Water	N/A	3,619,600 (434,000 Gallons)	Drain to sewer
Waterline	Liquid	Construction	Hydrotest Water	N/A	10,000 (1,200 Gallons)	Drain to Sewer
Facility	Gas	Construction	Natural Gas	N/A	N/A	To Atmosphere

TABLE 2-19
Devil's Canyon Road Site Construction Waste Estimates

Location	Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total (Pounds)	Devil's Canyon Road Site Alternative Estimated Total (Pounds)	Disposal Method
Facility	Gas	Construction	Nitrogen	250	250	To Atmosphere
Facility	Solid	Construction	Asbestos Containing Material	N/A	N/A	None for New Construction
Facility	Solid	Construction	Lead Containing Material	N/A	N/A	None for New Construction

Notes: VCM = Ventura Compressor Station Modernization; N/A = not applicable.

Operations and Maintenance Phase

The preliminary quantities for solid waste and wastewater for the Devil's Canyon Road Site Alternative during operation and maintenance are estimated in Table 2-20, below (originally from Table 5.19-6 in the PEA). The assumption is that the quantities of waste for the Devil's Canyon Road Site Alternative would be the same as for the VCM Project.

TABLE 2-20
Devil's Canyon Road Site Plant Operation Waste Estimates

Waste Type	Project Phase	Description of Waste	VCM Project Estimated Total	Devil's Canyon Road Site Alternative Estimated Total	Disposal Method
Solid	Plant Operation	Plastics (Packaging/ Containers)	10 Pounds per Month	10 Pounds per Month	Hazardous Waste Facility
Liquid	Plant Operation	Oily Rags and/or Absorbents	10 Pounds per Month	10 Pounds per Month	Hazardous Waste Facility
Liquid	Plant Operation	Solvents	10 Pounds per Month	10 Pounds per Month	Hazardous Waste Facility
Liquid	Plant Operation	Lubricating Oils	100 Gallons per Month	100 Gallons per Month	Hazardous Waste Facility
Liquid	Plant Operation	Industrial Water	700 Gallons per Month	700 Gallons per Month	Hazardous Waste Facility

Note: VCM = Ventura Compressor Station Modernization.

2.11.3 Provide a description of existing stormwater infrastructure for each alternative site.

RESPONSE

The Devil’s Canyon Road Site appears to have a stormwater drain just southwest of the site and north of Devil’s Canyon Road (Exhibit 2-23) and portions of the site also appear to have concrete-lined swales for stormwater drainage (Exhibit 2-24). The photos for Exhibits 2-23 and 2-24 were taken by SoCalGas in January 2022 from land to which SoCalGas has access rights to assess site conditions.



Exhibit 2-23: Existing stormwater drain at the Devil’s Canyon Road Site



Exhibit 2-24: Existing stormwater swale at the Devil’s Canyon Road Site

Based on the photos taken in January 2022, Devil’s Canyon Road does not appear to have a distinct drainage curb and stormwater gutter system. Additional site investigations would be needed to assess the existing stormwater infrastructure at this site.