

**CENTRAL VALLEY
NATURAL GAS
STORAGE
PROJECT**

**VARIANCE
REQUEST
FORM**



Date Required:	October 10, 2011	Variance Request No.:	No. 13 – Temporary Pipeline to Withdrawal Water for Hydrostatic Testing
Date Submitted:	October 6, 2011	Location:	Glenn-Colusa Canal at western end of project area
Property Owner(s):	Glenn-Colusa Irrigation District Azevedo Holthouse	Parcel No.:	011-140-021 011-140-004
Current Land Use:	Agriculture and landowner's graded parking area.	Sensitive Resources:	Two seasonal wetlands (SW-3 and SW-4) were mapped previously in the proposed pipeline alignment along the south side of Dirks Road. The landowner has graded this area and is currently parking farming equipment in the area that once supported the seasonal wetlands. These wetlands were previously impacted and mitigated as part of the PG&E Colusa Generating Station Project.

Variance from: This variance requests the CPUC's approval to work outside the designated work area and place a water pump and temporary 8-inch pipeline and pump to support pumping of water from the Glenn-Colusa Canal. This water will be used to conduct hydrostatic testing on the natural gas pipeline system. As described in the revised Dewatering and Discharge Plan (dated September 28, 2011), the water would be pumped from the Glenn-Colusa Canal and discharged at the eastern end of the project area onto Sunrise-Sunset LP (as shown in Table 2 of the plan). The project description in the MND and the Dewatering and Discharge Plan did not describe the placement of the temporary pipeline. In addition, temporary pipeline is outside the designated work area.

Description and Justification for Variance: As shown in the attached figure, CVGS is proposing to place the water pump in the Glenn-Colusa Canal and place the 8-inch pipeline on the surface of the Glenn Colusa Irrigation District's Main Canal berm. After crossing the berm, the pipeline would run west along the south side of Dirks Road and then south along an existing unpaved access road to the pipeline. The temporary pipeline will be placed on the ground surface and removed after the hydrostatic testing is complete. Currently, the hydrostatic testing is planned for October 10 through October 24, 2011.

Environmental Analysis: A brief description of the potential environmental effects associated with the installation of the temporary pipe is provided below.

Aesthetics. The visual impacts would be the same as those described in the IS/MND. No mitigation is required.

Agricultural and Forestry Resources. The pipeline will be placed on the ground surface and would not interfere with any of the agricultural activities occurring in the area. No impacts on agricultural or forestry resources are anticipated. No new mitigation has been identified.

Air Quality and GHG Emissions. The pipeline would not result in any new or greater impacts than were previously described in the MND. No new mitigation has been identified.

Biological Resources. An ICF biologist walked the additional work area on September 26, 2011. No burrowing owls, western pond turtles (that could occur in the Glenn-Colusa Canal and D-62 which occurs adjacent to the canal) or other sensitive biological resources were observed during this survey. As described above, the two seasonal wetlands that were mapped (as part of the PG&E Colusa Generating Station wetland delineation) are no longer present. This area has been graded and substantially disturbed by the landowner and is currently being used for parking agricultural equipment. The placement of the temporary pipeline in this area will not affect biological resources given level of disturbance in the area, lack of resources, and short duration of time that the pipeline will be in place. A copy of the biological survey report is provided with this variance request. Additional preconstruction surveys will be conducted prior to the use of the additional work area and the appropriate biological resource APMs will be implemented. No new mitigation has been identified.

Cultural Resources. No impacts on cultural resources are anticipated and no mitigation has been identified.

Geology and Soils. The pipeline would not result in any new or greater impacts than were previously described in the MND for geologic, soil, and seismic site conditions. No mitigation is required.

Hazards and Hazardous Materials. The pipeline would not result in any new or greater impacts than were previously described in the MND. CVGS will implement the appropriate APMs and mitigation measures identified in the MND to avoid and minimize potential impacts, including APMs HAZ-1 and HAZ-2 and mitigation measure HAZ-3. No new mitigation has been identified.

Hydrology and Water Quality. The pipeline would not result in any new or greater impacts than were previously described in the MND for hydrology and water quality. No mitigation is required.

Land Use and Planning. No potentially significant impacts related to land use have been identified. No mitigation is required.

Mineral Resources. The temporary pipeline would not have a significant effect on mineral and energy resources and would not result in the loss of the availability of the resources because none occur in the project area. No mitigation is required.

Noise. The temporary pipeline will not result in any noise-related impacts. No mitigation is required.

Population and Housing. The temporary pipeline would not result in any new or greater impacts than were previously described in the MND. No mitigation is required.



Public Services. The temporary pipeline would not result in any new or greater impacts on public services than were discussed in the MND. No mitigation is required.

Recreation. The temporary pipeline would not result in recreation impacts. No mitigation is required.

Transportation/Traffic. The temporary pipeline would not result in transportation or traffic impacts. No mitigation is required.

Utilities and Service Systems. The temporary pipeline would not require an expansion or improvement in utilities or service systems, including wastewater and water supply treatment or delivery. No mitigation is required.

Site Conditions/Comments: The area is substantially degraded from current construction activities and agricultural production.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Mgr				
Central Valley Construction Manager	10/6/11	Dirk de Bruyn		
Central Valley Environmental Manager	10/6/11	Susan Bushnell Bergfalk		None

Prepared by: Susan Bushnell Bergfalk, Environmental Manager, ICF International Date: October 6, 2011