A Central Valley Gas Storage

May 15, 2017

Re: RESPONSE TO CPUC DATA REQUEST OF MAY 1, 2017; COMPOSITION OF GAS AFTER WITHDRAWAL FROM NATURAL GAS STORAGE FACILITY

Attached is the response of Central Valley Gas Storage, LLC ("CVGS") to the Data Request you issued on May 1 2017, provided by the Operations Manager of the facility. I've also attached an analysis of the composition of the natural gas delivered by CVGS to Pacific Gas and Electric ("PG&E") taken on May 2, 2017.

As we've discussed, the only processing done by CVGS is to remove water vapor that may be withdrawn along with natural gas from the CVGS storage formations. Adding water vapor to the analysis would not change the composition of the gas to a significant degree.

If you have any questions regarding CVGS gas composition or need further information, please let me know.

California Public Utilities Commission Data Request

May 1, 2017

To: Central Valley Storage, LLC

Re: Composition of gas after withdrawal from natural gas storage facility.

The information below is being requested for the study undertaken by the California Council on Science and Technology pursuant to Senate Bill 826.

1) What is the composition (e.g., identification and proportion of various constituents) of the gas after a standard operational withdrawal prior to processing from each well at the underground storage facility or facilities you operate in California?

Central Valley Gas Storage, LLC ("CVGS") Response:

Attached is an analysis of the composition of the natural gas delivered by CVGS to Pacific Gas and Electric ("PG&E") taken on May 2, 2017 ("May 2 Analysis"). This analysis is a typical representation of both the gas CVGS delivers to PG&E and the gas CVGS receives from PG&E. The May 2 Analysis shows that the composition of the gas was:

- Methane ~ 94.1%
- Ethane ~ 4.5%
- Other Hydrocarbons ~0.1%
- Nitrogen ~ 0.5%
- Carbon Dioxide ~ 0.8%

The chromatograph that measures the gas composition at the CVGS/PG&E interconnection metering station is actually owned by PG&E. CVGS receives a signal from PG&E's chromatograph and the gas composition analysis is updated every 10 minutes.

CVGS does not take composition readings at each of its wells and the composition reading at the PG&E interconnect metering station is the only composition measurement CVGS utilizes other than monitoring water vapor content.

To provide overall context, the CVGS facility was developed from depleted natural gas reservoir formations that were not believed to produce any compounds (i.e. oil or heavy hydrocarbons) other than natural gas. CVGS has withdrawn gas for approximately 5 years and has not seen any indications of other compounds attaching to gas. The only substance that has been confirmed to attach to gas stored in the CVGS reservoirs is water vapor. The only processing CVGS performs on the gas withdrawn from its wells is dehydration. CVGS has equipment to monitor water vapor content of the natural gas delivered, which must meet PG&E standards.

CVGS receives pipeline quality natural gas from PG&E, injects it into the depleted reservoir formations, withdraws it at a later date, dehydrates the gas to remove water vapor and delivers dry natural gas to PG&E. The composition of the gas received from PG&E and the gas returned to PG&E are not materially different. The composition of the gas returned to PG&E only differs from that of the gas withdrawn from CVGS' wells by the water vapor content removed by CVGS through dehydration.

CVGS periodically takes measurements on the water vapor/moisture content of the gas entering the dehydration process. These measurements have indicated that water vapor content in the gas withdrawn from its formations averages roughly 12 lbs. per million cubic feet, or approximately 0.5% by volume. Therefore, if water vapor were added to the composition from the May 2 Analysis, the other numbers would be reduced very slightly but not significantly.

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56		0.5879		0.5879		C8		0.0006		0.0006	
N2		0.5058		0.5058		C9		0.0000		0.0000	
C02		0.8291		0.8291		C10		0.0000		0.0000	
CH4		94.1071		94.1071		H2O %		0.0000		0.0000	
C2		4.4386		4.4386		H2S		0.0000		0.0000	
C3		0.0876		0.0876		H2		0.0000		0.0000	
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NC4		0.0123		0.0123		02		0.0000		0.0000	
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