Response to Second
PEA Completeness Review

Ventura Compressor Modernization Project

JULY 2024

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Printed on 30% post-consumer recycled material.

Table of Contents

SECTION **PAGE NO.**

APPENDICES

EXHIBITS

TABLE

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Acronyms and Abbreviations

Acronym/Abbreviation	Complete Term
API	American Petroleum Institute
BST	Baker-Strehlow-Tang
CFR	Code of Federal Regulations
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
EI	Energy Institute
ESD	emergency shutdown
GHG	greenhouse gas
LFL	lower flammability limit
LSIR	location-specific individual risk
PEA	Proponent's Environmental Assessment
PES	Potential Explosion Sites
psi	pounds per square inch
QMEFS	Quest model for estimating flame speed
QRA	Quantitative Risk Assessment
RP	Recommended Practice
UKOOA	UK Offshore Operators Association

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1 Introduction

SoCalGas® (Applicant) prepared and submitted to the California Public Utilities Commission (CPUC) the Application for a Certificate of Public Convenience and Necessity (CPCN) for the Ventura Compressor Station Modernization Project (Project). CPUC General Order 177 for Gas Infrastructure requires that all applications for CPCNs include an Applicant-prepared Proponent's Environmental Assessment (PEA). SoCalGas submitted the CPCN Application (A.23-08-019) and PEA to the CPUC on August 24, 2023.

The CPUC provided its first PEA Completeness Review for the Project on September 22, 2023. The first Response to Comments document was submitted to the CPUC on November 21, 2023, and provided the information requested by the CPUC. On May 9, 2024, the CPUC submitted a second PEA Completeness/Deficiency Review of the Project, evaluating the updates provided in packages from SoCalGas dated November 21, 2023, and April 2, 2024.

All deficiencies and completeness items identified by the CPUC are required to be addressed before the PEA can be deemed complete. This Second Response to Comments responds to and provides the information requested in the May 9, 2024, Second PEA Completeness Review.

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2 Responses to the CPUC's Comments

The information provided below is in response to the request for additional information detailed in the CPUC and Aspen Environmental Group's Second PEA Completeness/Deficiency Review of the Project, evaluating the updates provided in packages from SoCalGas dated November 21, 2023, and April 2, 2024. Each CPUC/Aspen information request from May 9, 2024, is summarized below, followed by SoCalGas' response.

Revisions to the PEA are shown below as excerpts from the PEA text. Added or modified text is in double-underline format, while deleted text is shown as ~~strikeout~~ text.

The July 8, 2024, Quantitative Risk Assessment of the Ventura Compressor Station Modernization Project (QRA) has been included as Appendix S-1, Risk Assessment Report, in Appendix S, Risk Assessment Documentation, to the PEA. Appendix S to the PEA is included with this Response to Comments document.

2.1 Deficiency Area No. 1, Hazard and Public Safety

CPUC Comment No. 1: *Please expand the discussion of risk analysis methodology, especially the failure case definitions, to clarify how scenarios of third-party damage or sabotage would or would not be reflected in Risk Assessment results.*

Response to CPUC Comment No. 1: The failure case selections cover all portions of the natural gas compression and fuel gas systems. Failure cases and their subsequent consequences do not explicitly define (or include) the cause of the failure. In this way, the accidental releases included in the QRA, represented by a full range of release hole sizes from the systems included in the risk analysis, are defined independently of the many potential causes and so are representative of the consequences that would arise from those various causes. From the consequences point of view, third-party damage and sabotage are included in the risk analysis.

The other aspect of inclusion in a risk analysis is the frequency of failure cases (as opposed to the consequences). In the failure rate databases applied in the QRA, a wide range of causes were included. Each event that contributed to a failure rate for a section of piping or piece of processing equipment was a release of hydrocarbon from containment systems, but the failure mode (or cause) is not always listed or extracted from the database. It is reasonable to assume that third-party damage events (e.g., dropped objects during construction or accidents during maintenance activities), as well as any sabotage events that may have occurred, are included in the failure rates, and thus are inherently included in the QRA.

So, while the consequences of both sabotage and third-party damage are represented in the QRA, an assumption regarding their inclusion in the frequency analysis must be used. Overall, these risks are qualitatively minimized by project design features, best management practices, site security, and simultaneous operations planning.

The QRA report has been modified to include a short summary of this discussion in Section 2.2 of the QRA report.

CPUC Comment No. 2: *Please clarify whether the analysis considers the potential for any personnel within the defined Potential Explosion Sites (PES) and clarify whether the location-specific individual risk (LSIR) results account for continuous occupancy within the facility.*

Response to CPUC Comment No. 2: The scope of the analysis and the risk measures chosen for the analysis involved location-specific individual risk (LSIR) only for fatality impacts to persons who are outdoors. This measure (LSIR) is independent of both the occupancy at any one location and the number of persons that may be in that location. Given this measure of risk, the analysis did consider, and provides a measure of the potential for personnel within the outdoor PES. LSIR, by its nature, assumes a continuous occupancy for all locations. Thus, all the risk results are representative of continuous occupancy, whether on site or off site.

The analysis did not evaluate the potential impacts to personnel within compressor buildings (also PES) or any other building. To the extent that a person within a building is provided protection against external hazards modeled in the QRA, the analysis is conservative (i.e., it provides a prediction of risk that is expected to be greater than what would actually exist at that location). Buildings provide protection against flammable vapor clouds and thermal radiation, in comparison to being outdoors. Building occupants are, however, more vulnerable to vapor cloud explosion impacts in comparison to persons outdoors. Because the risk of the Ventura Compressor Station is dominated by jet fire impacts, the risk contours are expected to be an overprediction of the potential impact to persons indoors from externally originating hazards.

There may be potentially significant impacts to personnel within the proposed Project's compressor building due to the presence of flammable gas sources in the building, but these are similar or identical to what exists in the current compressor building. The evaluation of indoor risk to personnel was not included in the QRA and would involve accounting for equipment status (running, not running, depressured), personnel occupancy, hazard detection by personnel (audible and visual), hazard detection by devices (gas and/or flame detectors), audio/visual alarms in the buildings, evacuation timing, and other factors. This risk is qualitatively minimized by project design features, best management and operating practices, personnel training, detection and alarm systems, and emergency shutdown (ESD) actions.

CPUC Comment No. 3: *Please review the detection and isolation system rating guide (of API [American Petroleum Institute] RP [Recommended Practice] 581, RP 581, Part 3 – Consequence of Failure Methodology, Table 4.5) and summarize the types of detection and isolation systems in use for different sizes of leaks at the existing compressor station and for the proposed project. The descriptions of the detection and isolation systems should be sufficiently detailed for Energy Division Staff and consultants to appropriately classify the systems in terms of API RP 581.*

Response to CPUC Comment No. 3: The intent of API RP 581 (which is not necessarily applicable to systems under jurisdiction of Title 49 of the Code of Federal Regulations, Section 192 [49 CFR 192]) is to help in development of a risk-based methodology for equipment inspections, to enhance the reliability of a facility and reduce overall risk. The categorizations provided in the standard help in prioritizing inspection intervals but are not intended to replace a rigorous consequence analysis or a risk analysis.

The isolation times presented in RP 581 Part 3, Table 4-5, are not specifically given for use in a QRA. Additionally, they are generalized response times that do not necessarily apply to any one facility. The QRA used information from the existing and proposed facilities to develop site-specific detection and isolation times, based on the systems in place.

API RP 581, Part 3, Section 4.6, describes detection and isolation systems as those that are "designed to detect and isolate a leak and tend to reduce the magnitude and duration of the release." Section 4.6.2 states that "Detection and isolation systems that are present in the unit can have a significant impact on the magnitude and duration of the hazardous fluid release," and qualitative guidance for the event durations are provided in Table 4-5. Using the descriptive characterizations provided in Table 4-5, the Ventura Compressor Station could be "graded" as "A" for detection and "A" for isolation. This finding arises from the presence of systems that detect abnormal pressures or pressure rates of changes in the system and automatically isolate the compressor station from the associated pipelines. The compressor station could also be graded as "B" for detection and/or "B" for isolation because there are areas where gas and/or flame detection is provided, and an isolation/shutdown would need to be initiated by an operator. These A/B gradings are then used in Table 4-7 to indicate minimum leak durations for various release hole sizes.

Additionally, Section 4.6.4 of API RP 581, Part 3, states that "there is no total leak duration provided in Table 4-7 for the rupture case (largest release hole size, if greater than 4 inch diameter)." Further discussion in Annex 3.A discusses the isolation or duration times associated with large releases, stating the following:

> Large leaks are detected within a few minutes because of the operational indications that a leak exists. The amount of time that a large leak or rupture will be fed is expected to range from 1 to 5 minutes with 3-minutes selected as the midpoint of the range.

Thus, the duration/isolation times presented in Table 4-7 do not include ruptures and are subjective based on the assessment of detection and isolation capabilities at the facility. Table 1 compares the values applied in the QRA to those that may be defined by application of API RP 581.

Table 1. Event Duration Comparison

Hole Size (Inches)	Duration of Normal Flow or Event Duration (Minutes)		
	Quest QRA	API RP 581 A+A	API RP 581 B+B
1/4	30	20	40
3/4	15	—	—
1	—	10	30
2	10	—	—
4	—	5	20
6	5	—	—
Rupture	3	3	3

Notes: QRA = Quantitative Risk Assessment; API = American Petroleum Institute; RP = Recommended Practice.

As shown in Table 1, the differences between Quest's QRA and the API RP 581 recommendations are not fully comparable due to different hole size definitions, but the differences are mostly minor. Furthermore, for flammable gas systems like the ones found at the Ventura Compressor Station, release durations beyond a few minutes do not change the magnitude of the hazards. Pressurized gas releases typically develop (disperse) to their maximum extent within seconds or tens of seconds, and then recede as the pressure in the system decays. In the QRA, the hazard magnitudes are described in these first moments to provide conservative impact distances. If a shutdown/isolation is initiated, the remaining inventory in the system continues to be released, but at a decaying release rate, resulting in smaller and smaller impact zones. Thus, whether a leak is assigned a duration of 20, 30, or 40 minutes, the hazard impact distances are the same because they are defined in the first moments of the release. Likewise, even for large events (4-inch, 6-inch, or rupture holes) a short shutdown and isolation time is not expected to modify the extent of the consequences due to the behavior of flammable gases.

CPUC Comment No. 4: *Please describe of the type of detection system and isolation system for the scenario (Table A-3) of a 6-inch hole size and rupture releases for the compressor building and outside locations for the proposed project.*

NOTE: The reference to Table A-3 was confirmed as erroneous; Table A-5 was intended.

Response to CPUC Comment No. 4: The ESD systems for the Project would be designed consistent with the requirements of 49 CFR Part 192. The ESD system would be designed and built to react quickly to shut down the gas supply, evacuate gas from connected equipment, and de-energize non-essential electrical systems. This includes actions such as isolating the piping systems and associated equipment by closing valves, deactivating associated equipment (such as the compressors), and depressuring the system by venting gas to a safe location that is specifically designed for evacuating and depressuring the system.

In the event of an emergency (e.g., a pipe rupture), activation of the ESD system and associated isolation valves is achieved by either automatic or manual means. Process parameter indications (e.g., pressure), as well as fire and gas detection systems, would be designed and implemented to activate an alarm and to automatically initiate an ESD when appropriate. The site would have manual activation points located strategically throughout the facility and in the control room for personnel to activate an ESD. The new station would be designed with redundancy to add an additional layer of safety.

The details of the fire and gas detection systems for the proposed Project have not yet been developed. However, the system will include both flame detectors and gas detectors within the compressor building compliant with the requirements of 49 CFR 192.736. In addition, the process system monitoring (variables such as pressure and flow rate) will have alarm states that notify operators of abnormal conditions (thus enabling manual ESD activation) and may be tied to automatic activation of the ESD system.

As a sensitivity case, the QRA was rerun with a detection and isolation (shutdown) time of 5 minutes instead of 3 minutes for the rupture hole size. All other hole sizes were unchanged, as presented in Table A-5. No discernible change was detected in the resulting risk contours.

CPUC Comment No. 5: Please add complete citations to clarify sources of information for each of data tables and define "the Energy Institute" and "UKOOA" (p. A-23).

Response to CPUC Comment No. 5: The Energy Institute (EI) is a London-based industrial association committed to providing leadership for using energy resources in an efficient and sustainable manner. EI was formed in 2003 through a merger of the Institute of Petroleum and the Institute of Energy. These organizations publish technical guidance documents, research papers, and standards to support the activities of the general energy industry. UKOOA, the UK (United Kingdom) Offshore Operators Association, was the primary contributor to the cited document, but it was published by EI. The reference, cited as "UKOOA," will be modified in the QRA report to recognize the EI as the publisher.

CPUC Comment No. 6: *Please elaborate on the claim of "pipeline risk is generally low due to the infrequent failure rates" (p. 35) by referencing a citation for pipeline failure frequency and by explaining the relative differences in pipeline failure rates as compared to other incident rates used in the assessment.*

Response to CPUC Comment No. 6: Referencing the Risk Assessment Report, Appendix A, Section A-3.1, it can be seen that failure rates for individual pieces of equipment are within the 10^{-3} to 10^{-5} per year orders of magnitude. Process plant piping has failure rates in the 10^{-6} to 10^{-7} per year orders of magnitude, per foot of pipe. Finally, buried gas pipelines have a failure rate of around 10^{-8} per year, per foot of pipeline.

Based on these documented failure rates, it requires between (approximately) 1,000 and 100,000 feet of buried gas pipeline to equal one piece of processing equipment. Likewise, 10 to 100 feet of buried gas pipeline would have a failure rate equal to 1 foot of process piping. From these observations, it is a reasonable conclusion to find that pipeline risk is generally low, due to the infrequent failure rates. In practice, gas pipeline fatality risk is found to be low—typically less than 1.0×10^{-6} per year directly above the pipeline, even when continuous occupancy is assumed.

A reference to the relevant sections in the Risk Assessment Report, Appendix A has been added to the Risk Assessment Report where this claim is stated in Section 4.4.4.

CPUC Comment No. 7: *Please refine the figures for Location Specific Individual Risk (LSIR) with an overlay of the risk contour plots on a satellite or aerial photo base maps to provide more insight into the specific structures that are located within the risk zones.*

Response to CPUC Comment No. 7: The QRA report has been modified to show the LSIR contours with an aerial image background.

CPUC Comment No. 8*: Please expand the figures for LSIR to include contours for levels less than 10^{-6}, e.g., 5.0×10^{-7} and 3.0×10^{-7}.*

Response to CPUC Comment No. 8: Following the latest discussion with the CPUC and its consultants, the 5.0×10^{-7} per year risk contour was selected for addition to the QRA results. All LSIR figures in the QRA report have been updated accordingly.

CPUC Comment No. 9: Please add hazard modeling endpoints for explosion overpressure at levels less than 2.4 pounds per square inch (psi) to inform the scope of potential serious injury. For example, to assess probability of off-site injury, please include explosion overpressure endpoints of 1.0 psi to 0.70 psi.

Response to CPUC Comment No. 9: The QRA was based on fatality impacts to persons outdoors. Thus, the 2.4 psi overpressure value represents the threshold of fatality, and the lowest overpressure endpoint within the QRA. Following discussion with the CPUC and its consultants, the 1.0 psi overpressure level was selected for evaluation. 1.0 psi is a common overpressure endpoint that is typically associated with partial damage to ordinary buildings that could result in injuries.[1] Note that 1.0 psi is unlikely to have serious effects on persons outdoors. The explosion overpressure calculations from the QRA were rerun, and injury risk contours for exposure to 1.0 psi overpressure were created. These are shown in Exhibit 1 for the existing Ventura Compressor Station and in Exhibit 2 for the proposed Project.

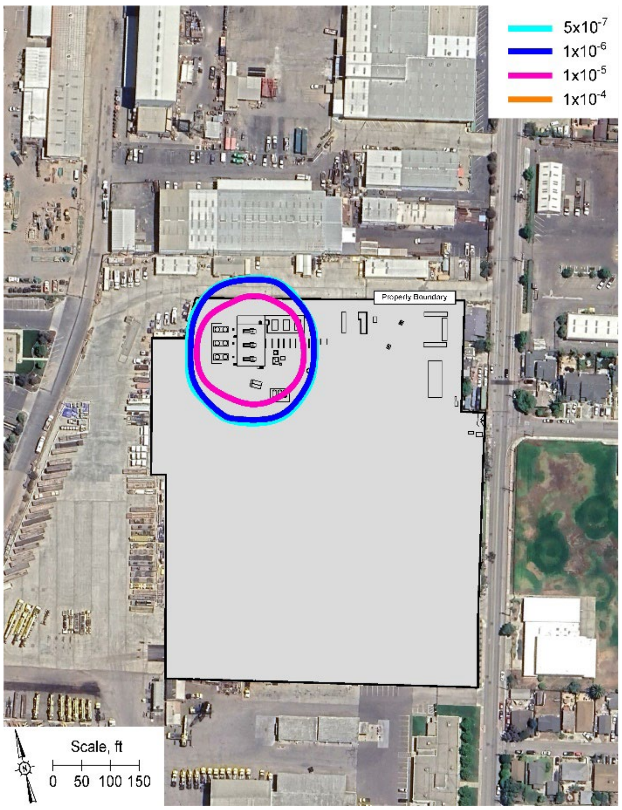

Exhibit 1. 1.0 psi Overpressure Injury Risk Contours – Existing Ventura Compressor Station

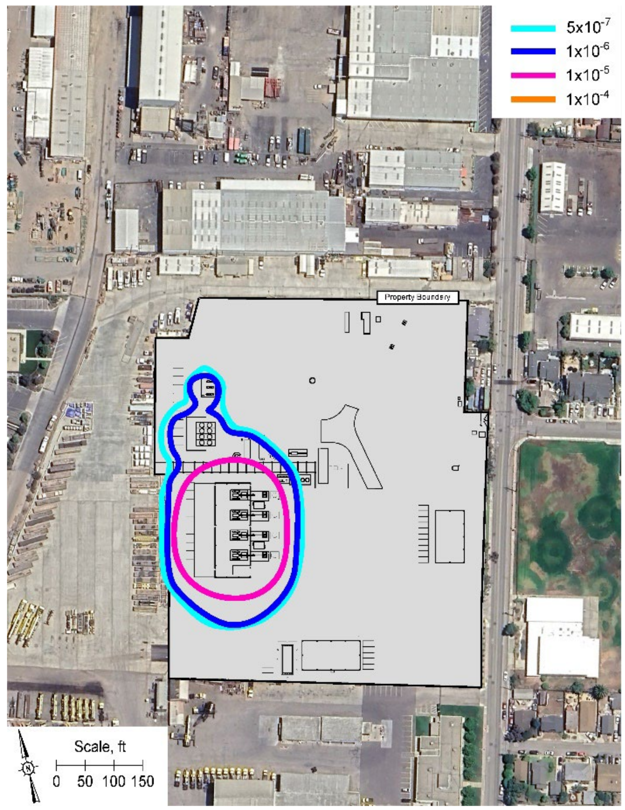

Exhibit 2. 1.0 psi Overpressure Injury Risk Contours – Proposed Project

CPUC Comment No. 10: *Please provide a listing of the assumptions and input parameters for the Failure Cases presented in Table D-2 and specify the factors that resulted in the decreases in distances to lethal hazard levels.*

Response to CPUC Comment No. 10: Assumptions concerning the failure cases and modeling are presented in Appendix A of the Risk Assessment Report. All scenarios that were marked with an asterisk in the CPUC's request (in the explanation before the above item) are buried lines. The hazard distances

1 U.S. Environmental Protection Agency's Office of Emergency Management. 2004. General Guidance on Risk Management Programs for Chemical Accident Prevention (40 CFR, Part 68), Chapter 4: Offsite Consequence Analysis. April 2004. https://www.epa.gov/sites/default/files/2013-11/documents/chap-04-final.pdf.

presented in the QRA report are for grade level hazards. If the comparison is being made between failure cases for aboveground equipment and buried lines, the difference is in release orientation. Buried lines have an assumed minimum orientation of 19° from horizontal (see Risk Assessment Report Appendix A, Section A-2.4.4). Other assumptions applicable to the various failure cases are listed in the QRA report, Appendix A; initial gas conditions are presented in Appendix C to the Risk Assessment Report.

Natural gas releases from pressurized systems produce a very directional jet. Horizontal orientations create a jet that stays near grade and has a long impact distance. A 19° release orientation from a buried line results in a flammable vapor cloud that only impacts the area near grade level within about 10 to 15 feet of the release point. The remainder of the vapor cloud (which can be 100 feet long or more) is elevated to the extent that its ignition is not a direct hazard to persons farther than about 15 feet from the release location.

CPUC Comment No. 11: *Please explain why the distance to LFL [lower flammability limit] is much less than the existing facility for the proposed project failure cases, but the extent of the thermal radiation hazard would be about the same. This appears to assume immediate ignition and jet fire. Also, please explain whether the immediate ignition probability is different for buried lines and unburied lines.*

Response to CPUC Comment No. 11: If the comparison is being made between aboveground equipment and buried lines, the difference is in release orientation, as described in the Response to CPUC Comment No. 10. Flammable vapor cloud impact zones are much smaller near grade for the 19° releases, because the flammable zone is elevated. However, if the released gas is ignited, the flames from horizontal (0°) and 19° release orientations are similar, to the extent that the maximum thermal radiation hazard distance (as measured near grade, from the release point) is essentially the same.

All cases were run with the potential for immediate, delayed, and no ignition. Immediate ignition is based on released fluid type and the mass release rate (see QRA report Section A-3.2.1). Thus, the immediate ignition probability for horizontal releases (aboveground equipment) and 19° releases (buried lines) is identical, given an identical release rate.

CPUC Comment No. 12: *Please explain the difference in distance to LFL between unburied failure cases EXS07 and CSM07.*

Response to CPUC Comment No. 12: Failure case EXS07 has a direct connection to the discharge pipeline, such that failures in that system would be driven by backflow from the pipeline. Failure case CSM07 is the aboveground portion of the compressor discharge system, which is followed by several hundred feet of buried pipe that connects to the existing pipeline infrastructure. Between the aboveground piping and the discharge pipeline are two isolation valves and the long segment of piping, such that the scenario would not be dominated by backflow from the pipeline. Scenario CSM08, the buried portion of the compressor discharge system, was modeled similarly to EXS07, with the premise that backflow from the pipeline would dominate the release behavior.

CPUC Comment No. 13: *Please elaborate on whether vapor cloud explosion results would be the same if the release duration for a rupture was 5 minutes compared with 3 minutes (Table A-3).*

NOTE: The reference to Table A-3 was confirmed as erroneous; Table A-5 was intended.

Response to CPUC Comment No. 13: There is no time dependence with Quest's explosion modeling. The criterion applied is whether a release of natural gas could fill (or partially fill) a potential explosion site (PES) with a flammable mixture. Thus, a 3-minute shutdown compared to a 5-minute shutdown would result in the same magnitude of explosion, provided that the flammable cloud reaches the PES. This occurs because of two factors: (1) these are all gas releases, which develop to their farthest extent within seconds or tens of seconds, and (2) the modeling describes the flammable vapor cloud with a release flow rate that is an average over the first 60 seconds of the release. To the extent that a release event results in a mass release rate that declines over time (minutes or tens of minutes), this assumption captures a representative release flow rate that would result in the largest flammable vapor cloud. It was also assumed that ignition of the flammable vapor would occur after the vapor cloud has developed to its largest extent. Thus, the interaction of the flammable vapor cloud and a PES is modeled as a representative worst case in all scenarios, and a longer release duration would not generate larger explosions.

CPUC Comment No. 14: *Please elaborate on whether vapor cloud explosion results would be the same if standard BST [Baker-Strehlow-Tang] methodology were to be applied to the explosion model.*

Response to CPUC Comment No. 14: Vapor cloud explosion results would not be exactly the same if the BST model was implemented in this QRA. Due to the similarities between the models, and the properties of natural gas, the predicted overpressure results would be similar, but not the same. If the Quest model for estimating flame speed (QMEFS) parameters are modified to artificially match the limited set of BST classifications, close agreement can be generated. This modification would then not properly represent the PES in the QRA study, which defeats the purpose of applying the more detailed QMEFS model.

CPUC Comment No. 15: *Please define "QMEFS" and provide a copy of the referenced paper by Marx & Ishii (2017) that defines Quest's QMEFS model.*

Response to CPUC Comment No. 15: QMEFS is an acronym for "Quest model for estimating flame speed."

The 2017 Marx and Ishii paper is attached to this response document as Appendix S-2.

CPUC Comment No. 16: *Please provide examples where the QMEFS variation of the BST method was applied in other Risk Assessments for sites in California or in another public-agency review or public decision-making process that may be reviewed by the CPUC.*

Response to CPUC Comment No. 16: Quest has been using the QMEFS model on projects for at least 12 years; however, on most projects it is bound to confidentiality with its clients, such that project deliverables cannot be shared. While many of these deliverables were prepared within the context of regulatory compliance, most have not been posted for public review (e.g., submittals to the Pipeline and Hazardous Materials Safety Administration [PHMSA] in liquid natural gas [LNG] facility siting studies, where QMEFS has been used). Quest is aware of one project where a risk analysis using QMEFS was made available publicly. This work was done prior to, but referenced within, a Pennsylvania Public Utilities Commission proceeding, and is provided as follows:

https://uwchlan.com/DocumentCenter/View/376/Citizens-Risk-Assessment-Final-Report.

See also https://www.puc.pa.gov/pcdocs/1681038.pdf.

There are several examples of Quest's work being made public within regulatory proceedings in California, but these are prior to Quest's development and implementation of QMEFS. For example, see the following:

https://www.rpvca.gov/DocumentCenter/View/8982.
https://www.coastal.ca.gov/energy/lng/comments-lng-lb-12-2005.pdf.
http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2004/ultramar-valero/appc252.pdf.

2.2 Deficiency Area No. 2, Greenhouse Gas Emissions and Health Risk Assessment

CPUC Comment No. 17: *Please quantify the reasonably foreseeable proposed project GHG [greenhouse gas] and toxic air contaminant emissions rates associated with natural gas volumes of vented emissions and fugitive emissions from components leaks.*

Response to CPUC Comment No. 17: This response will be provided under separate cover.

CPUC Comment No. 18: *Please confirm that vented emissions and fugitive emissions from components leaks are considered and included in the Health Risk Assessment for the predicted health risks during project operation. Please include quantified cancer risk and noncancer hazard indices for these sources.*

Response to CPUC Comment No. 18: This response will be provided under separate cover.

2.3 Deficiency Area No. 3, Description of Alternatives

CPUC Comment No. 19: *Please provide PEA Figure 4-2, Supplemental Electric-Driven Compressor Alternative Site Plan, and a complete description of the components that would be included with the alternative for comparison with the proposed project components.*

Response to CPUC Comment No. 19: In the Response to CPUC Comment No. 8 in the September 2023 PEA Completeness Review, a typographical error occurred. Reference to Figure 4-2 was made; however, that figure does not exist. The information requested in the CPUC comment is provided in the Supplemental Electric-Driven Compressor Alternative Site Plan in Appendix A, Detailed Maps and Design Drawings, to the PEA. The typographical error has been corrected with the update provided in this section.

Section 4.3.1, Supplemental Electric-Driven Compressor Installation Only Alternative, in Chapter 4, Description of Alternatives, was revised as follows:

4.3.1 Supplemental Electric-Driven Compressor Installation Only Alternative

The Project includes the replacement of the existing natural gas-driven compressors (natural gas compressors) with two new natural gas compressors and two new electric-driven compressors (electric compressors). This alternative would leave the three existing natural gas compressors and install new electric compressors at the site. The operation of the compressor station would primarily utilize the electric compressors first and use the existing natural gas compressors only as needed. No removal of the existing equipment and buildings related to the natural gas compressors would occur. Construction of a new building to house the new electric compressors and the associated improvements and infrastructure necessary would be completed as part of this alternative. Please reference Figure 4-2, Supplemental Electric-Driven Compressor Alternative Site Plan, and Appendix A, Detailed Maps and Design Drawings, for a conceptual site plan that includes a preliminary equipment listing for this alternative alongside the existing facility. Please reference the Supplemental Electric-Driven Compressor Alternative Site Plan in Appendix A, Detailed Maps and Design Drawings, for a conceptual site plan that includes a preliminary equipment listing for this alternative alongside the existing facility.