

August 12, 2024

Kern County Planning and Natural Resources Department  
2700 M Street, Suite 100  
Bakersfield, CA 93301

**Re: CEQA Review of the Aera CarbonFrontier Carbon Capture and Storage Project at Belridge Oil Field**

To Kern County Planning and Natural Resources Department:

The undersigned 45 organizations write to express our strong opposition to the CarbonFrontier carbon capture and storage (CCS) project at the Belridge oil fields in Kern County.<sup>1</sup> We are deeply concerned that the CarbonFrontier project will deploy expensive, dangerous, and ultimately failed CCS technology to extend the life of dirty fossil fuel facilities.

The project's Draft Environmental Impact Report (EIR) lists a number of unacceptable impacts, such as:

- Total air pollution would be significant and expose sensitive populations to “substantial pollutant concentrations”;
- Total greenhouse gas emissions (GHGs) would have a significant impact on the environment and conflict with plans to reduce GHGs;
- The project would contribute to cumulative harms to local groundwater supply;
- A rupture from the planned CO2 pipelines could lead to significant harms, including possible fatalities to workers at the nearby Wonderful Nut Farms; and
- The project's annual electricity demand would amount to nearly 3% of the County's total.

These impacts, and many others, cannot be mitigated away. **We urge you to reject this project and invest in real clean energy solutions that advance California's air, climate, public health, and environmental justice goals.**

**Importantly, too, the CarbonFrontier project will derail California's transition away from fossil fuels.** The project's main purpose is to keep oil field operations alive while generating subsidies for capturing and injecting some of its GHG pollution. But for a long period of time the project will result in a net *increase* of GHG emissions because the CCS will be powered by natural gas. This is simply going in the wrong direction since fossil fuels must be phased out, rather than finding new uses for them.

It is also doubtful that the project will be net negative for GHG emissions in the future. Real world examples prove that CCS technology has not worked as promised despite decades of development and billions of dollars of investment. Carbon capture projects have repeatedly over-promised and under-delivered<sup>2</sup> on their capture rates while providing cover for polluting

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<sup>1</sup> CEQA Project 2023060293 / Kern County PP23402.

<sup>2</sup> IEEFA, “The Carbon Capture Crux” (Sept. 2022), <https://ieefa.org/resources/carbon-capture-crux-lessons-learned>.

industries.<sup>3</sup> In addition to its repeated failures, carbon capture is *not necessary* as a climate solution, according to the Intergovernmental Panel on Climate Change.<sup>4</sup> Frontline communities in Kern County should not be used as a testing ground for flawed and unnecessary techno-fixes like carbon capture.

Furthermore, relying on failed technology to keep oil fields operating decades longer flies in the face of California's climate goal of 85% *direct* emissions reductions by 2045. In order to rapidly reduce GHG emissions and actually decarbonize, California must stop permitting projects that further entrench fossil fuels that are driving the climate crisis.

**The CarbonFrontier project poses serious risks to public health, safety, and the environment in Kern County:** The project will lead to a host of harmful impacts to the region, including impacts to air, climate, water, health and safety, seismicity, pipeline safety, and animal and plant species.

Twenty-eight homes in Lost Hills are 3.5 miles from the project site. The project also relies on 14.5 miles of CO<sub>2</sub> pipelines, which increases the risk of dangerous leaks and ruptures. The Draft EIR does not offer any kind of emergency response plan, and instead puts this off to sometime in the future without the chance for public comment. This is inappropriate with such a serious (and potentially deadly) impact of the project. Moreover, the Draft EIR says that Wonderful Nut Farms, which operates a solar panel area near the project's CO<sub>2</sub> pipeline, may be exposed to a deadly pipeline leak. The County does not say that it plans to notify this company or its workers of the nearby danger. All workers, residents, schools, and others within several miles of the project must be notified and prepared.

## Conclusion

The CarbonFrontier CCS project would prolong the life of dirty fossil fuel facilities, threaten California's progress toward its climate and clean energy goals, endanger people, and exacerbate local pollution, all when CCS is not a real climate solution. The proponent of this project, Aera Energy, recently merged with California Resources Corporation, a company with a history of financial failures. Allowing oil companies with poor financial track records to deploy failed carbon capture technology is an unacceptable risk. We urge you to reject this dangerous project.

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<sup>3</sup> See, e.g., The Guardian, "Carbon capture project is 'Band-Aid' to greenwash \$10bn LNG plant, locals say" (Feb. 3, 2023), <https://www.theguardian.com/environment/2023/feb/03/carbon-capture-gas-exports-rio-grande-lng-nextdecade>. For example, in July 2021, Chevron admitted that its commercial-scale carbon capture project in Australia failed to meet its five-year capture target of 80% CO<sub>2</sub>, and instead only captured 30%. IEFFA, "If Chevron, Exxon and Shell Can't Get Gorgon's Carbon Capture and Storage to Work, Who Can?" (April, 2022), <https://ieefa.org/articles/if-chevron-exxon-and-shell-cant-get-gorgons-carbon-capture-and-storage-work-who-can>.

<sup>4</sup> The IPCC-modeled pathway with the best chance of keeping warming at or below the target of 1.5°C makes no use of fossil fuels with carbon capture and storage (CCS) or bioenergy with carbon capture and storage (BECCS). IPCC, Summary for Policymakers in Global Warming of 1.5°C: An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty (2018) at 14, Section C.1.1., Figure SPM 3b (Pathway 1); see also *id.* at Ch. 2.3.3 and Table 2.SM.12. See also Center for International Environmental Law, *Confronting the Myth of Carbon Free Fossil Fuels* at 2, <https://www.ciel.org/wp-content/uploads/2021/07/Confronting-the-Myth-of-Carbon-Free-Fossil-Fuels.pdf>.

Sincerely,

Center for Biological Diversity  
Central Valley Air Quality Coalition  
Dolores Huerta Foundation  
Leadership Counsel for Justice and Accountability  
The Center on Race, Poverty, and the Environment  
El Pueblo Para el Aire y Augua Limpió de Kettleman City (The people for clean air and water of Kettleman City)  
Clean Water Action  
The Climate Center  
350 Bay Area Action  
350 Sacramento  
Active San Gabriel Valley  
Azul  
Ballona Institute  
Benicians for a Safe and Healthy Community  
Biodiversity First!  
Biofuelwatch  
California Nurses for Environmental Health & Justice  
Center for Community Action and Environmental Justice (CCA EJ)  
CleanEarth4Kids.org  
Climate Action California  
Climate First: Replacing Oil & Gas (CFROG)  
Climate Hawks Vote  
Climate Reality Monterey Chapter  
Defend Ballona Wetlands  
East Yard Communities for Environmental Justice  
Elders Climate Action (ECA) Northern California (NorCal) Chapter  
Elders Climate Action (ECA) Southern California (SoCal) Chapter  
Environmental Justice Coalition for Water (EJCW)  
Fossil Free California  
Friends of the Earth  
Glendale Environmental Coalition  
Good Neighbor Steering Committee of Benicia  
Indivisible Marin  
Manhattan Beach Huddle  
Oil Change International  
Planning and Conservation League  
San Francisco Bay Physicians for Social Responsibility  
San Mateo Climate Action Team

Santa Cruz Climate Action Network  
Science and Environmental Health Network  
Society of Native Nations  
SolidarityINFOService.org  
Sunflower Alliance  
Sustainable Mill Valley  
West Berkeley Alliance for Clean Air and Safe Jobs