EOTHERMAL ENERGY INSTITUTS 680 BEACH STREET, SUITE 426 SAN FRANCISCO. CALIFORNIA 94109 (415) 474-0404

March 30, 1974

U. S. Atomic Energy Commission Washington, D. C.

> RE: River Bend Station Nuclear Power Plants West Feliciana Parish, Louisiana

Proposed Allens Creek Nuclear Generating Station Austin County, Texas

Bellefonte Nuclear Plants (Units 1 and 2) Jackson County, Alabama

Gentlepersons:

We supplement our previous communications with respect to these proceedings and once again point out the inadequate evaluation of alternative energy sources, particularly geothermal energy sources, by either the applicants or by your staff.

NEPA requires not only a "rigorous exploration" and description of alternative courses of action but also "an analysis of their costs and impact on the environment." President's Council On Environmental Quality, 1972, Environmental Quality-Third Annual Report, p. 243.

EPA requires that "special care" be taken to respond fully to comments that are at variance with the staff's positon. We are of the considered opinion that a review of EIS documents prepared during 1973 and 1974 leads inevitable to the conclusion that this standard is not being followed and has been subscantially ignored.

We note that the Department of the Interior does not review the Commission's EIS documents for proposed nuclear power plants with respect to the substantive content of any analysis of alternatives. The U.S.G.S. review is limited to a review of the seismic situation for siting purposes.

May we furnish you with additional information which relates to the geothermal-geopressured potential of the Gulf Coast:

1. Jones, P. H. and Wallace, R. H., Jr., 1973, Hydrogeologic aspects of structural deformation in the northern Gulf of Mexico Basin: U. S. Geological Survey, Bay St. Louis, MIssissippi 39520.

2. U. S. G. S. Professional Paper 800-A, p. A10-A11, 1973.

3. Grossling, B.F., 1973, Geothermal potential of the United States: U. S. Geological Survey, Washington, D. C. Open-file report.

4. Houston Geological Society, 1971, Abnormal subsurface

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pressure: Houston, Texas. (Contains an exstensive biblography).

5. U. S. Patent No. 3,258,069 (1966) Method for producing a source of energy from an overpressured formation.

6. Hise, B.R. and Hawkins, M.F., Jr., 1973, Geopressured water as an energy resource: Louisiana State University, Baton Rouge, Louisiana 70803.

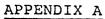
Very truly yours,

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Donald F.X. Finn Managing Director

CC; Environmental Protection Agency, Washington, D.C. Joint Congressional Committee on Atomic Energy Federal Energy Office Office of Management and Budget The Futures Group Energy Information Office The Energy Policy Project

ENCLOSURES (9 PRGS)

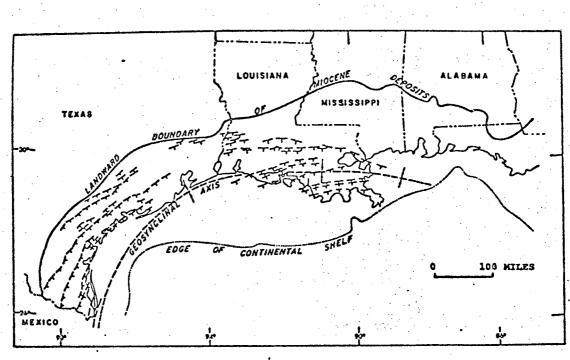


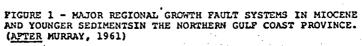
IMPORTANT PUBLICATIONS RELATED TO GEOPRESSURED WATER AS AN ENERGY RESOURCE

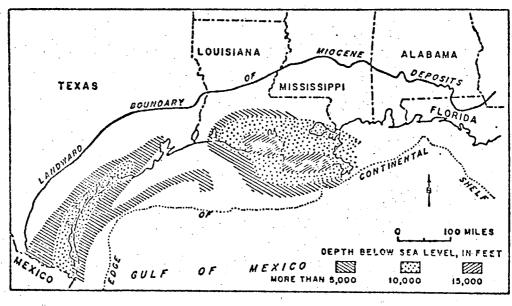
 Hottman, C. E.: "Method for Producing a Source of Energy from an Overpressured Formation", U. S. Patent No. 3,258,069 filed Feb. 1963, granted June 1968, assigned to Shell Oil Company, New York, N.Y.

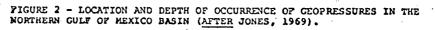
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- Proceedings of the First Symposium on Abnormal Subsurface Pressure, Louisiana State University at Baton Rouge, April 28, 1967. Sponsored by the School of Geology and the Department of Petroleum Engineering.
- Jones, Paul H.: "Hydrology of Neogene Deposits in the Northern Gulf of Mexico Basin", Bulletin GT-2, Louisiana Water Resources Research Institute, Louisiana State University at Baton Rouge, April 1969.
- 4. <u>Proceedings of the Second Symposium on Abnormal Subsur-</u> <u>face Pressure</u>, Louisiana State University, January 30, 1970. Sponsored by the School of Geoscience and the Department of Petroleum Engineering.
- 5. Third Symposium on Abnormal Subsurface Pore Pressure, Louisiana State University at Baton Rouge, May 15-16, 1972. Sponsored by the School of Geoscience and the Society of Petroleum Engineers of AIME.
- 6. <u>Geothermal Energy-A National Proposal for Geothermal</u> <u>Resources Research</u>, Final report of the Geothermal <u>Resources Research</u> Conference, Seattle, Washington, September 18-20, 1972, Walter J. Hickel, Chairman.
- 7. Parmigiano, J. M.: <u>Geohydraulic Energy From Geopressured</u> Aquifers, M. S. Thesis, May 1973, Department of Petroleum Engineering, Louisiana State University at Baton Rouge.









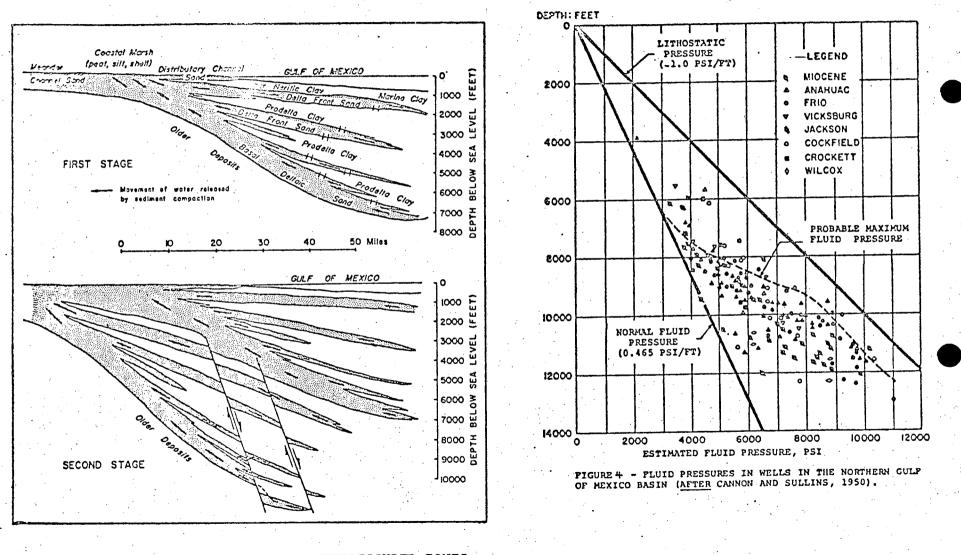
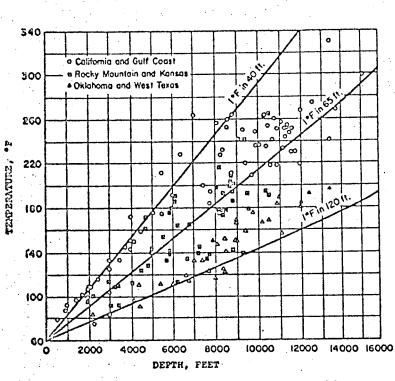


FIGURE 3 - CROSS SECTION SHOWING GEOPRESSURED ZONES CAUSED BY FAULTING (AFTER JONES, 1967)

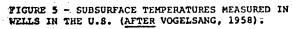
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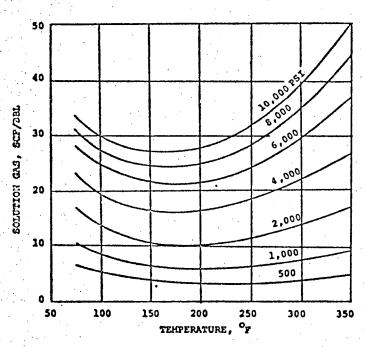
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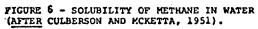
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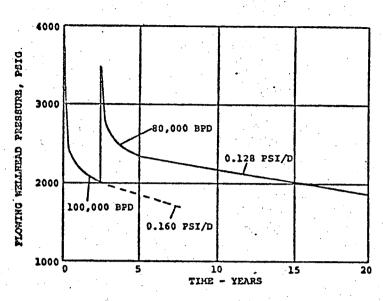
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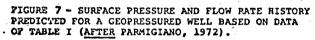


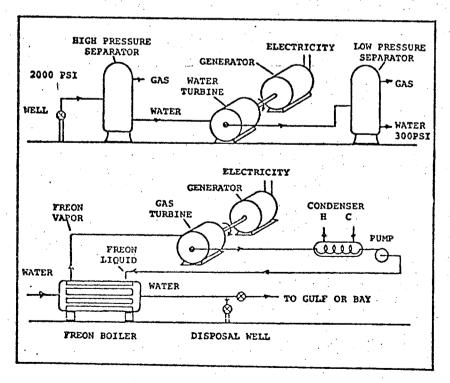




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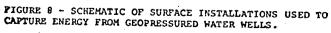


TABLE I-WELL AND AQUIFER DATA

DEPTH OF RESERVOIR	12,000 FT
INITIAL PORE PRESSURE	10,000 PSIG
STRATUM THICKNESS	200 FT
ROCK POROSITY (PERCENT)	20
ROCK PERMEABILITY	100 MD
ROCK COMPRESSIBILITY (EFFECTIVE)	10 ⁻⁵ ps1 ⁻¹
RESERVOIR TEMPERATURE	260°F
WATER VISCOSITY (AT 260°F)	0.30 CP
WELL DIAMETER (PIPE I.D.)	9 IN
WELL RADIUS	0.375 FT
RESERVOIR RADIUS	10 MILES

CLOSED EXTERNAL BOUNDARY

		•
KIND OF ENERGY	CONVERSION EFFICIENCY	ELECTRIC POWER
	(PERCENT)	(MEGAWATTS)
NATURAL GAS	25	7.5
GEOHYDRAULIC	75	1.5
GEOTHERMAL	11	_6.0
	TOTAL	15.0

POWER PRODUCTION ESTIMATE

TABLE 3

WELL FLOW RATE	80,000	BWPD
FLOWING SURFACE PRESSURE	2,000	PSIG
WELLHEAD WATER TEMPERATURE	260	۶F
NATURAL GAS CONTENT OF WATER	. 30	SCF/BBL
GAS PRODUCTION RATE	2,400	MCF/DAY
GAS HEATING VALUE	1,000	BTU/SCF
WATER TEMPERATURE AT DISCHAR	GE 100'	°F

DATA FOR POWER PRODUCTION ESTIMATE

INSTALLATION ECONOMICS

TABLE 4

GEOPRESSURE

ASSUME 3 WELLS FOR A PLANT	=	45 MEGAWATTS
3 WELLS AND DISPOSAL FIELD		\$10,000,000
SURFACE POWER STATION	=	\$ 7,000,000
TOTAL COST	=	\$17,000,000
COST/KW	=	\$380
	• . •	

NUCLEAR \$/KW

= \$300-\$500-\$600+

TABLE 5

OPERATING ECONOMICS

GEOPRESSURE

OPERATING COST FOR SOURCE WELLS PLUS DISPOSAL FIELD	3 = \$500,000/YR.
RAW POWER PRODUCED	$= 400 \times 10^6$ KW-HR/YR.
RAW POWER COST (FUEL COST)	= 1.25 MILS/KW-HR
NUCLEAR (FUEL COST)	= + 1.5 MILS/KW-HR

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TABLE 6 NATURAL GAS FROM GEOPRESSURE WATER	TABLI GEOPRESSUI	
500 WELLS .447 TCF/YR TOTAL GAS OVER 15 YR. LIFE 6.50 TCF TOTAL GAS OVER 30 YR. LIFE = 13.00 TCF	500 WELLS @ 15 MW./WI CONVENTIONAL POWI	
CONVENTIONAL SOURCES PRODUCTION RESERVES <u>RATE</u> (1-1-72) (TCF/YR) TCF STATE OF LA. 8 80 (INCLUDES OFFSHORE)	<u>INSTALLATION</u> L.S.U. CITY OF LAFAYETTE, LA. STATE OF LA.	<u>RATE OF CONSUMPTION</u> (MEGAWATTS) 20 150 4100 300,000

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TABLE 8 LSU RESEARCH PROPOSAL

	WORK	E:	STIMATED COST
PHASE 1 (ONE YEAR)	GEOLOGIC SURVEY WELL TESTING WATER ANALYSIS	\$	50 0,0 00
PHASE 2 (FOUR YEARS)	TEST WELL TEST FACILITY PILOT PLANT	\$1(0,000,000