

**Ex. I-1**

I.19-06-016-SED Response to SoCalGas Data Request Set 10.

Date: 6-15-20

SED reserves the right to update these responses if additional information becomes available.

1. Identify the person(s) who drafted SED's Reply Testimony.

The person who drafted SED's Reply Testimony is Ms. Margaret Felts.

2. Refer to SED Reply Testimony at page 7: "In 1988, the remote [well kill] system was used when gas was blowing out of well P-44 and there was fear that the gas would ignite from the operation of equipment and vehicles near the well. There are many similarities between the two well failures and therefore SED fails to understand why SoCalGas elected not to use the remote kill system that Mr. Neville describes when SoCalGas initially attempted to kill Well SS-25."

- a. Describe in detail the "many similarities between the two well failures."

Based on information provided in Exhibit Bates No. SED\_RT\_0112 and P-44 Well File Bates No. AC\_CPUC\_0025628

- a. There was a failure at P-44 that resulted in gas emitting uncontrollably from the well site
- b. The incident occurred at the peak of storage season, so reservoir pressure was high
- c. Personnel first attempted to close rams/valves manually, but were unsuccessful and could not stop the gas flow
- d. There was fear of a spark igniting the gas, so equipment was turned off/shut down
- e. Contractors were called in to assist with killing the well
- f. A hydrate formed (but for P-44, the hydrate plug was blown out by gas pressure)

b. Identify all persons, excluding attorneys, who assisted in the preparation of the response to Data Request 1.a.

SED objects to this question as vague and ambiguous. There is no question 1.a. in this data request. SED understands this question to be asking about question 2.a., and will answer accordingly. Margaret Felts prepared the response to 2.a.

3. Refer to SED Reply Testimony at page 17: "Mr. Bret Lane, SoCalGas' Chief Operating Officer at the time of the kill attempts, confirmed this point under oath...."

a. Please identify, quoting the language in SED's Reply Testimony, what "this point" refers to.

In the transcript quote shown in SED Reply Testimony beginning at page 17, Mr. Bret Lane was asked to identify the people who were present during the well kill operations. He did not identify anyone who was present at the well kills. Instead, he chose to discuss how he moved people from one assignment to another.

4. Refer to SED Reply Testimony at page 18: “In another section of his testimony, Mr. Schwecke says ‘SoCalGas consulted with Boots & Coots and provided input in the development and review of well kill plans, along with various agencies and other outside experts and consultants, including additional well control specialists who were retained and the Department of Energy’s National Laboratories’ (citation omitted). Again, SED finds these comments to contradict the answers provided to SED during discovery.”

a. Please identify all “answers provided to SED during discovery” that contradict the quoted statement, as noted in the above passage.

SED objects to this question as unduly burdensome because it asks for SoCalGas’s own data responses, which SoCalGas has or should have in its possession. To date, SoCalGas has provided no records that support the claim that SoCalGas consulted with Boots & Coots and provided input in the development and review of well kill plans. A few emails found among thousands of emails provided by SoCalGas showed that SoCalGas was copied on some comments regarding well kill plans. SED found no substantive communications that would alter Margaret Felts’s testimony. SoCalGas is in a much better position than SED to identify efforts that support Mr. Schwecke’s claims. SED DRs that asked for communications between SoCalGas and other parties regarding kill plans are:

DR 16 Q 10, Q 12, Q 16

DR 33 Q.12

DR 57

5. Refer to SED Reply Testimony at page 19: “The efforts SoCalGas took to reduce leak impacts failed to make much difference in the impacts....”

a. State with specificity what the “impacts” refer to.

See Schwecke Opening Testimony, p. 7 line 30 – p. 8, line 2

Although Ms. Felts cannot read his mind, based on the testimony that follows p.8 line 2, in which Mr. Schwecke discusses various options considered to mitigate impacts, her assumption is that Mr. Schwecke uses the term “impacts” to refer to the impacts of gas emissions, which continued for 111 days.

b. State all facts upon which YOU base the statement that SoCalGas’ efforts “failed to make much difference in the impacts.”

Other than stopping injection into SS-25 and nearby wells, which was necessary in the immediate response to the SS-25 well failure, not an option as Mr. Schwecke implies, SoCalGas was not successful in reducing the amount of gas discharging from SS-25 for the 11 days from discovery of the leak until the well was killed.

c. Identify all persons, excluding attorneys, who assisted in the preparation of the responses to Data Requests 5.a. and 5.b.

Margaret Felts prepared the responses to questions 5.a and 5b.

6. Refer to SED Reply Testimony at page 20: “SED questions why SoCalGas waited 19 days before it began withdrawals from the Aliso Canyon storage facility to reduce the reservoir pressure to support well kill efforts and to reduce the amount of gas released.”

a. State all of Ms. Felts’ personal experience with regard to reducing reservoir pressure at an underground gas storage facility to support a well kill operation. Identify all personal experience by year, geographic area, operator of the underground gas storage facility, and circumstances under which it was necessary or prudent to reduce reservoir pressure at the facility.

Ms. Felts’ statement is based on basic engineering principles and knowledge of reservoir engineering calculations. While not directly related to a specific well failure, issues of reservoir pressure and reducing reservoir pressure were considered during Ms. Felts’ assessments of the Playa del Rey and Montebello UGS facilities in previous cases.

b. State all facts upon which Ms. Felts bases the statement quoted in Data Request 6.

The facts available to SED are in Mr. Schwecke’s Testimony at pp. 7-8. If SoCalGas initiated efforts to drill a relief well immediately after the first well kill effort, which is what Mr. Schwecke states on p. 8, lines 1-2 of his testimony, SoCalGas must have had a good idea that killing the well at the current reservoir pressure might not be more difficult than at a lower pressure. Logical reasoning, and a basic petroleum engineering response, would include drawing down reservoir pressure as much, and as fast as possible to improve possibility of success. Thus, there remains the question of why SoCalGas waited 19 days to do so. In all of the thousands of documents provided to SED, no documents were provided that included any information about the decision process that led to the delay of 19 days.

c. Identify all persons SED is referencing within the statement “SED questions.”

The term “SED” in the phrase “SED questions” is a typo. The sentence on page 20, lines 6 through 8 should read, “I question why SoCalGas waited 19 days before it began withdrawals from the Aliso Canyon storage facility to reduce the reservoir pressure to support well kill efforts and to reduce the amount of gas released.” Footnote 95 remains as part of the sentence.

d. When does SED contend SoCalGas should have commenced withdrawals from the Aliso Canyon storage facility to reduce the reservoir pressure?

SED objects to this question on the grounds that it is beyond the scope of SED’s role to prescribe when exactly SoCalGas should have commenced withdrawals, as this is a question that is part of

SoCalGas' role in handling its day to day operations. Notwithstanding these objections, the answer provided is as follows: As soon as possible.

e. What does SED contend would have been the difference in "impacts," as used in the statement from SED's Reply Testimony quoted in Data Request 5, if SoCalGas had begun withdrawals from the Aliso Canyon storage facility to reduce the reservoir in accordance with SED's response to Data Request 6.d.?

SED objects to this question as vague, ambiguous and unintelligible. Notwithstanding these objections, the answer provided is as follows: The term "impacts" is unrelated to the purpose of drawing down the reservoir pressure. Drawing down the reservoir pressure, as described by Mr. Schwecke will "lower reservoir pressure to support well kill efforts." Mr. Schwecke explains the process on p. 2 of his testimony: To perform a well kill, weighted fluid (typically a brine solution) is pumped down the well. As the fluid fills the wellbore, the weight of the fluid overcomes the pressure of the gas being pushed up from the reservoir. When the downward force of the fluid weight, known as a hydrostatic head, balances the upward force of the pressurized gas, the well becomes isolated from the reservoir and stops any flowing gas, and the well is "killed." Thus, the lower the pressure in the reservoir, the less downward force of the fluid weight (hydrostatic head) required to kill the well. In the case of SS-25, lower reservoir pressure was particularly important because the location of the casing leak was preventing operators from achieving a high enough hydrostatic head (full casing) to counteract the reservoir pressure at the bottom of the well. This analysis was provided in SoCalGas documents submitted to SED in response to DR 16.

f. If SED contends SoCalGas could have commenced withdrawals from the Aliso Canyon storage facility to reduce the reservoir pressure sooner than 19 days after the leak, state all facts upon which SED bases this contention. If SED bases its contention on the actions of other operators in the industry, specify the actions of such other operator(s) in the industry, including how many days after an incident the operator(s) commenced withdrawal.

SED objects to this question as compound. Regarding the second sentence in the question, SED also objects to the question as irrelevant. Specifically, it is irrelevant what other operators in the industry have done in the context of this question. Instead, whether SoCalGas properly commenced withdrawal at its own Aliso Canyon natural gas storage facility in a timely fashion in compliance with California Public Utilities Code Section 451 is at issue, which has nothing to do with the actions of other operators in the industry.

SoCalGas has not provided documents that would explain the logistics or issues that made it impossible to draw down gas from the reservoir sooner than 19 days. Every UGS facility is unique, so any information derived from other facilities would be irrelevant. SoCalGas is the sole source of such information.

g. Identify all persons, excluding attorneys, who assisted in the preparation of the responses to Data Requests 6.a. through 6.f.

Margaret Felts prepared the responses to questions 6.a through 6.f.

7. Refer to SED Reply Testimony at page 20: “This delay seems especially questionable given that SoCalGas initiated efforts to drill a relief well just 2 days after the well leak was discovered.”

a. State in detail what is “questionable” about the “delay.”

See responses to question 6.

b. State why the “delay seems especially questionable” in light of SoCalGas’ efforts to drill a relief well.

See responses to question 6.

c. Identify all persons, excluding attorneys, who assisted in the preparation of the responses to Data Requests 7.a. and 7.b.

Margaret Felts prepared the responses to questions 7.a and 7b.

8. Refer to SED Reply Testimony at page 20: “SED also questions whether SoCalGas was making operating decisions based on inaccurate reservoir pressure data, which could have led to over pressuring the reservoir, had Well SS-25 not failed.”

a. State all facts upon which YOU base the contention that SoCalGas might have been “making operating decisions based on inaccurate reservoir pressure data.”

This statement should have had a footnote referencing Blade main report pp.131-133.

b. Does SED contend that SoCalGas would have commenced withdrawals from the Aliso Canyon storage facility to reduce the reservoir pressure sooner than 19 days after the LEAK if it had different reservoir pressure data? If so, state all facts upon which YOU base this contention.

SED objects to this question as calling for speculation and argumentative. Notwithstanding these objections, the answer is as follows: I cannot guess what SoCalGas might have done if it had different reservoir pressure

c. Identify all persons, excluding attorneys, who assisted in the preparation of the responses to Data Requests 8.a. and 8.b.

Margaret Felts prepared the responses to questions 8.a and 8.b.

9. Refer to SED’s Opening Testimony at page 43-44, which references and reproduces a near copy of Figure 85 from the RCA Report (see image from SED’s Opening Testimony

reproduced below). The version of the image used in SED's Opening Testimony includes a yellow icon that appears to have been added by SED to a copy of the RCA Report that was later modified by SED.

- a. Describe what the yellow icon represents with respect to SED's Opening Testimony.

SED objects to this question as mischaracterizing the Opening Testimony. The Opening Testimony is Margaret Felts' Opening Testimony on behalf of SED. Notwithstanding this objection, SED answers as follows. We do not know what the yellow icon represents with respect to the Opening Testimony. Apparently, the yellow icon is a typo. At the appropriate time, SED will amend its testimony to omit the icon.

- b. To the extent the yellow icon represents a comment icon added by SED or Margaret Felts, please provide an exact quotation of the comment contained in the comment icon.

Ms. Felts has confirmed that the yellow icon does not represent a comment added by Ms. Felts. SED incorporates its answer to question 9a by reference here.

- c. Produce the entire version of the RCA Report that includes this yellow comment icon.

To the best of SED's knowledge at this time, SED does not have a version of the RCA Report that includes this yellow comment icon.

- d. Identify the person(s) who added the yellow icon to this image.

SED is uncertain which person or persons added the yellow icon to this image, except that it was not added by Ms. Felts.

10. Produce all COMMUNICATIONS from October 23, 2015 through the present RELATING TO the Department of Energy's National Laboratories' involvement with efforts to kill the LEAK.

SED objects to this question as vague, ambiguous, unintelligible, lacking foundation, overly broad and irrelevant because the question is not clear how "COMMUNICATIONS" from October 23, 2015 through the present RELATING TO THE Department of Energy's National Laboratories' involvement with efforts to kill the LEAK." has anything to do with SED or SED's witness in this proceeding. SED also objects on the grounds that the question is unduly burdensome, asking SED to produce communications regarding Department of Energy's National Laboratories' involvement with efforts to kill the LEAK that should be available to SoCalGas. If the question is clarified to address these objections, SED reserves the right to object on additional or different grounds.

11. Produce all COMMUNICATIONS from October 23, 2015 through the present RELATING TO SoCalGas' management of the LEAK.

SED objects to this question as vague, ambiguous, unintelligible, lacking foundation, overly broad and irrelevant because the question is not clear how “COMMUNICATIONS” from October 23, 2015 through the present RELATING TO SoCalGas’ management of the LEAK has anything to do with SED or SED’s witness in this proceeding. If the question is clarified to address these objections, SED reserves the right to object on additional or different grounds. SED also objects on the grounds of undue burden, asking SED to know of all communications relating to SoCalGas’ management of the LEAK, including those SoCalGas has had to which SED is not privy, and including that from other entities to which SED is not aware. If the question is clarified to address these objections, SED reserves the right to object on additional or different grounds.

12. Produce all DOCUMENTS and COMMUNICATIONS from October 23, 2015 through the present RELATING TO SED personnel’s observations at the SS-25 site RELATING TO the LEAK.

SED objects to this question as vague, ambiguous, unintelligible, lacking foundation, overly broad, and irrelevant. If the question is modified to cure the objections, then SED reserves the right to add to or modify its objections. SED also objects to this question to the extent it has been asked and answered. SED also objects to this question as irrelevant, asking about personnel’s observations when those observations were part of SED’s pre-formal investigation. SED’s pre-formal investigation was not used as the basis to open the OIL, and SED’s testimony did not rely upon SED personnel’s observations at the SS-25 site.

13. Produce all COMMUNICATIONS from October 23, 2015 through the present RELATING TO the RELIEF WELL.

SED objects to this question as vague, ambiguous, unintelligible, lacking foundation, overly broad, irrelevant, and outside the scope of the proceeding. The question is not clear how “DOCUMENTS and COMMUNICATIONS from October 23, 2015 through the present RELATING TO the RELIEF WELL specifically relates to the scope of the proceeding. SED also objects to the question as unduly burdensome to the extent it asks for COMMUNICATIONS that SoCalGas already has in its possession, or can access without interrogating SED, and to the extent that such a production would require extensive coordination throughout multiple individuals in SED. If the question is modified to cure the objections, then SED reserves the right to add to or modify its objections.

14. Produce all COMMUNICATIONS from October 23, 2015 through the present RELATING TO Boots & Coots.

SED objects to this question as vague, ambiguous, unintelligible, lacking foundation, overly broad, and irrelevant. SED also objects because the question is not clear how “all COMMUNICATIONS from October 23, 2015 through the present RELATING TO Boots & Coots” relates to the scope of the proceeding. SED also objects to the question as unduly burdensome to the extent it asks for COMMUNICATIONS which SoCalGas already has in its possession, or can access without interrogating SED. SED also objects to the question as unduly

burdensome in that it asks for information that SED already provided to SoCalGas in the form of SED's Examination Under Oath transcripts of Boots & Coots staff. If the question is modified to cure the objections, then SED reserves the right to add to or modify its objections.

16. Refer to the transcript of the February 5, 2020 deposition of Margaret Felts at pages 306:18-307:1:

Q: In the course of those discussions, did anyone indicate that the data had been lost?

A: There was a thought that -- not that it had been lost but that maybe it was not uploaded. There was also a comment that the thumb drives had been uploaded and then discarded. Because we thought maybe if we could get the thumb drives, I could look at it directly from those. But I have not been provided any thumb drives.

a. Identify all DOCUMENTS and/or thumb drives that SoCalGas produced to SED RELATING TO the investigation of the LEAK that SED lost, destroyed, or discarded.

SED has not lost, destroyed, or discarded any of the thumb drives or documents to which the question refers.

17. Refer to the transcript of the February 5, 2020 deposition of Margaret Felts at pages 307:2-9:

Q: Why couldn't you --If it had been uploaded from the thumb drives, why couldn't you look at the data that was uploaded?

A: Well, because the files weren't opening. And a lot of the larger files were opening with the message that said the file was corrupted; so there wasn't any way for me to recover it.

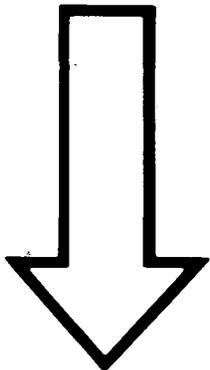
a. Identify all DOCUMENTS, including those on thumb drives, which SoCalGas produced to SED that SED could not download, open, extract, or otherwise view the contents of.

It is SED's understanding that SoCalGas was already informed by SED when files could not be opened. To SED's knowledge, SED emailed SoCalGas during the instances in which SED was unable to download, open, extract, or otherwise view the contents of a Data Response. If SED discovers another instance where SED cannot download, open, extract or otherwise view the contents of a SoCalGas data response, SED will inform SoCalGas of this.

Ex. I-2



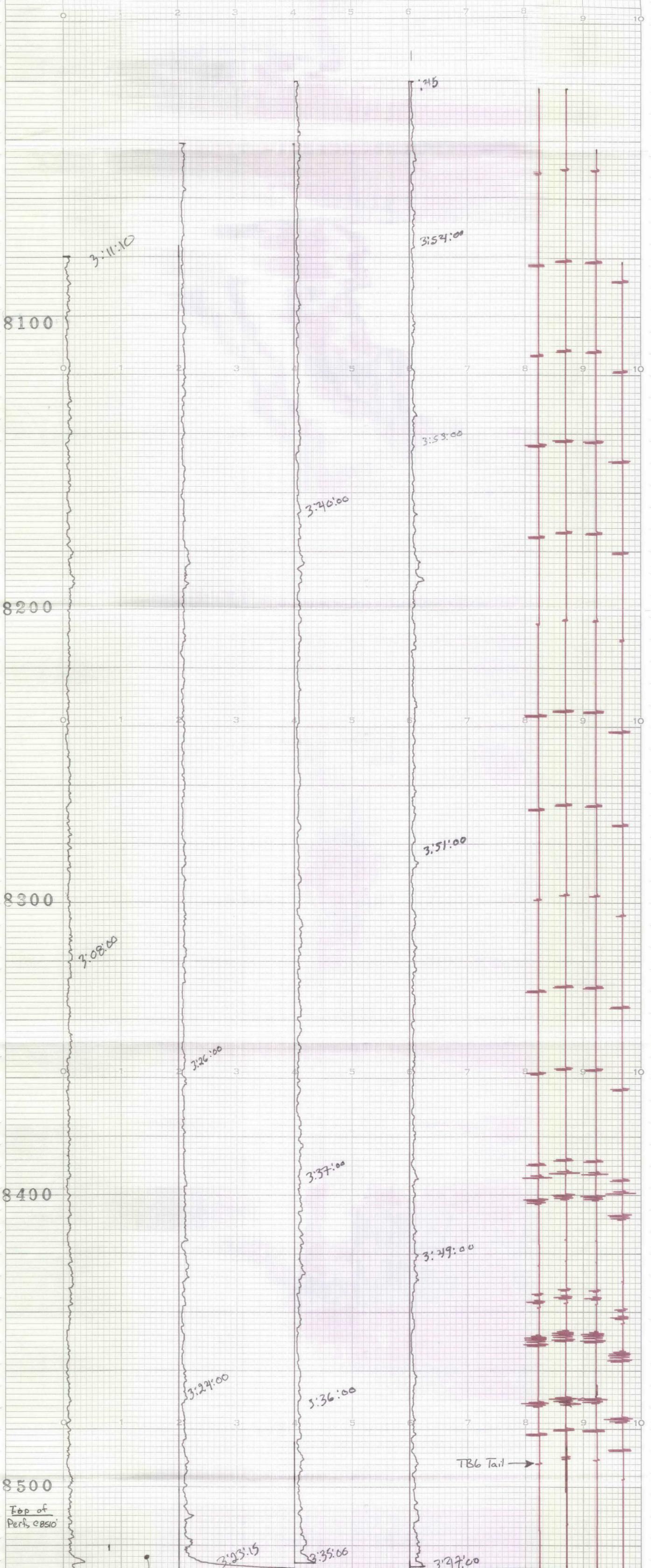
# FLO-LOG INC.



Company So. Calif. Gas Co.  
Type of Survey RIA - Tracer  
Date of Survey 7-29-84  
Lease, Well No. St. Sesnon #25  
Field Aliso Canyon







$\phi 9 1/2$   
 [This run is  
 6' deep]

Log #10 RAN with well  
 ON TBG Injection

<b>FLO-LOG</b>	
CO. NAME	So. Calif. Gas Co.
WELL NO.	S.S. 25
DATE	7-29-84
RUN NO.	TYPE LOG R/A - Tracer
CALIB.	LINE SPD
METER RATE	PRESSURE 2300

8100

8200

8300

8400

8500

2:05:00

2:15:00

2:25:00

2:37:00

2:36:00

2:55:00

2:03:00

2:13:00

2:28:00

2:34:00

2:01:00

2:10:40

2:20:25

2:31:25

3:59:00

Ø14 1/2

Ø15 1/2

Well on heavier TB6 Injection prior to Run #13

**FLO-LOG**

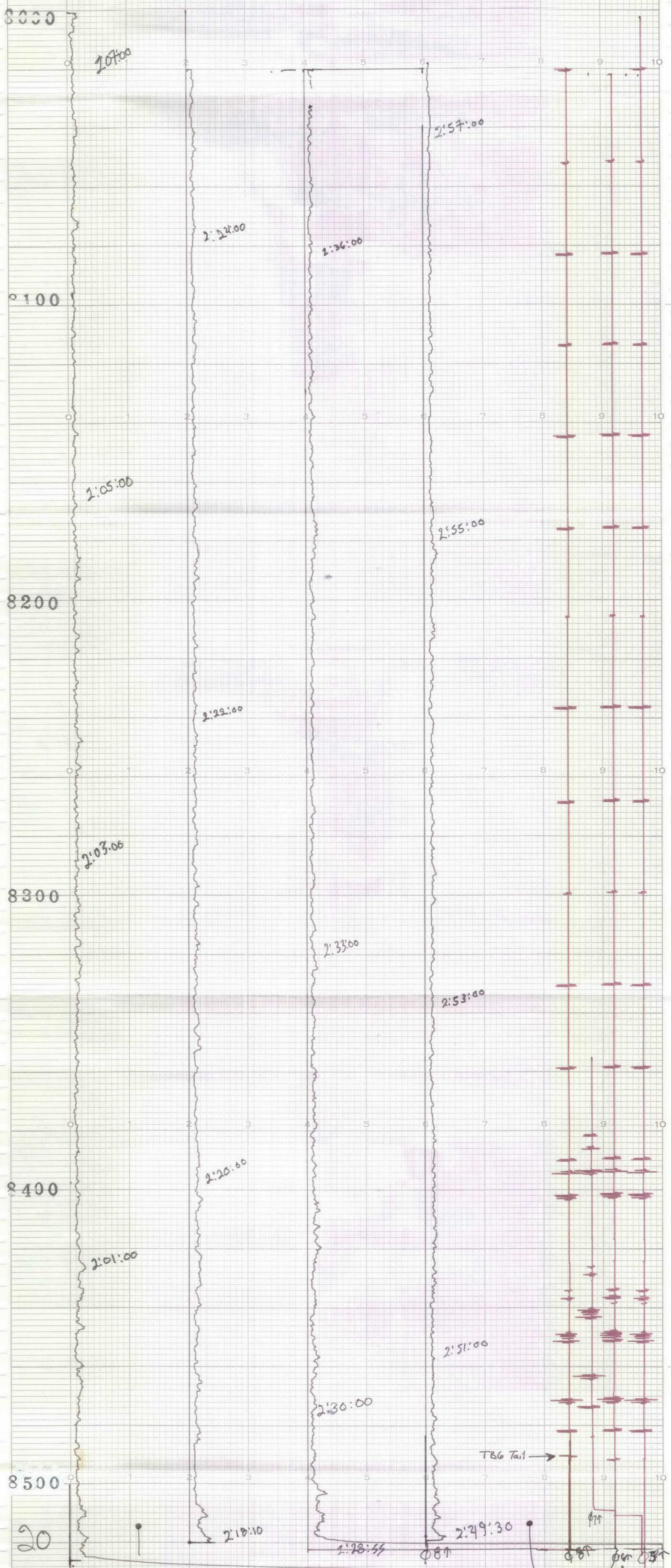
CO. NAME So. Calif. Gas Co.

WELL NO. SS-25 DATE 7-29-84

RUN NO. \_\_\_\_\_ TYPE LOG Tracer Log

CALIB. \_\_\_\_\_ LINE SPD \_\_\_\_\_ DIRECTION \_\_\_\_\_

METER RATE \_\_\_\_\_ PRESSURE \_\_\_\_\_



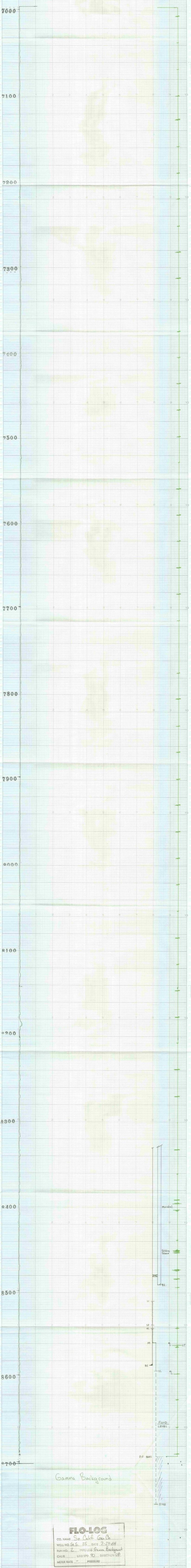
φ5up → Well put on TBG Injection for 3min. before hog #6  
 φ7↑ [Run 8' too high]  
 φ8↑

**FLO-LOG**

CO. NAME So. Calif. Gas Co.  
 WELL NO. SS #25 DATE 7-29-84  
 RUN NO. \_\_\_\_\_ TYPE LOG Tracer  
 CALIB. 100 CP LINE SPD \_\_\_\_\_ DIRECTION \_\_\_\_\_  
 METER RATE \_\_\_\_\_ PRESSURE 2300 ±

\* Well put on CSGN Injection 3min before hog #8





**FLO-LOG**  
 CO. NAME So. Calif. Gas Co.  
 WELL NO. St. S. 25 DATE 7-29-84  
 RUN NO. 2 TYPE LOG Gamma Background  
 CALIB. \_\_\_\_\_ LINE SPD 90 DIRECTION OP.  
 METER RATE \_\_\_\_\_ PRESSURE \_\_\_\_\_

**FLO-LOG**

CO. NAME So. Calif. Gas Co.

WELL NO. SS. 25 DATE 7-29-84

RUN NO. 1 TYPE LOG Capacitance

CALIB. 100 1/2" LINE SPD 90 DIRECTION UP

METER RATE - PRESSURE -

8400

8500

8600

8700

Water  
Oil  
2000 2100 2200 2300 2400 2500 2600

TBG Tail

Liner Top 0.59'

Fluid Level

BUFFALO, NEW YORK  
 GRAPHIC CONTROLS CORPORATION  
 No. BN 6277  
 BUFFALO, NEW YORK