

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA



**FILED**  
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ADMINISTRATIVE LAW JUDGES JESSICA T. HECHT and MARCELO  
POIRIER, co-presiding

Order Instituting Investigation on ) EVIDENTIARY  
the Commission's Own Motion into the ) HEARING  
Operations and Practices of Southern )  
California Gas Company with Respect )  
to the Aliso Canyon storage facility )  
and the release of natural gas, and )  
Order to Show Cause Why Southern )  
California Gas Company Should Not Be )  
Sanctioned for Allowing the ) Investigation  
Uncontrolled Release of Natural Gas ) 19-06-016  
from its Aliso Canyon Storage )  
Facility. (U904G) )

REPORTERS' TRANSCRIPT  
Virtual Proceeding  
March 18, 2021  
Pages 291 - 456  
Volume 3

Reported by: Carol Ann Mendez, CSR No. 4330  
Andrea L. Ross, CSR No. 7896  
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VIRTUAL PROCEEDING

MARCH 18, 2021 - 10:00 A.M.

\* \* \* \* \*

MARGARET FELTS,

resumed the stand and testified further as follows:

ADMINISTRATIVE LAW JUDGE HECHT: On the record.

The Commission will please come to order. This is the third day of the evidentiary hearings in Investigation 19-06-016. We have spent the last two days doing housekeeping things and doing cross-examination for the SED witness, Margaret Felts, and we're going to continue that cross-examination today.

Ms. Felts, do you remember the attestations, and understand that you are still subject to them?

THE WITNESS: Yes.

ALJ HECHT: All right. Thank you very much.

Are there any housekeeping items on the record before we begin?

(No response.)

ALJ HECHT: And seeing none, I think we'll begin.

1 Court reporter, are you ready?

2 Great.

3 Mr. Stoddard, you may start.

4 MR. STODDARD: Thank you, your Honor.

5 CROSS-EXAMINATION RESUMED

6 BY MR. STODDARD:

7 Q Good morning, Ms. Felts.

8 A Good morning.

9 Q Again, we've had a -- an  
10 attestation here in this proceeding where the  
11 parties have agreed not to record these  
12 hearings by video or audio. It doesn't,  
13 however, apply to third parties that may be  
14 observing these proceedings. As such, I'm  
15 going to ask whether or not you consent to  
16 being recorded.

17 Ms. Felts, do you consent to being  
18 recorded by audio or video during these  
19 proceedings?

20 A No.

21 Q Thank you. And Ms. Felts, do you  
22 have anybody there in -- in the room with you  
23 today?

24 A No.

25 Q And Ms. Felts, do you have a phone  
26 with you today?

27 A Yes.

28 Q Is your phone -- is your phone on?

1 A Yes.

2 Q Okay. Will you agree not to  
3 consult your phone in the course of the  
4 examination today?

5 A Yes.

6 Q Thank you. Yesterday, we were  
7 discussing your alleged violations related to  
8 SoCalGas's investigation of past well  
9 failures and leaks. Do you recall?

10 A Yes.

11 MR. STODDARD: I'm going to introduce  
12 Exhibit SoCalGas-126, and this is a data  
13 request; if you could please put that up.

14 Q And you'll see here, Ms. Felts,  
15 that this is titled "Southern California Gas  
16 Company's Ninth Set of Data Requests to the  
17 Safety and Enforcement Division." Do you see  
18 that?

19 A Yes.

20 Q And you see, also, that this was an  
21 exhibit that was used in the course of the  
22 deposition that we had last month. It's  
23 marked Exhibit 228. Do you see that?

24 A Yes.

25 MR. STODDARD: And then if we can  
26 scroll down, I'll read the Bates number, and  
27 it says, "SoCalGas-126.0001" on the first  
28 page. And if you could scroll down to

1 questions 2 and 3 -- sorry, question 1, and  
2 this is on page Bates number  
3 SoCalGas-126.0004.

4 Q Can you see, Ms. Felts, where it  
5 says:

6 "Are you aware of the policies or  
7 practices of other gas storage operators  
8 prior to or at the time of the leak with  
9 respect to well integrity management of  
10 underground gas storage facilities?"

11 A I see that.

12 Q Okay. And then it has some  
13 sub-questions. Do you see that?

14 A Yes.

15 Q And then if we could please turn to  
16 question number 5, and it -- I'd like to read  
17 the Bates number first on this page. And  
18 this is SoCalGas-126.0005.

19 The question 5 is: Are you aware  
20 of the policies or practices of other gas  
21 storage operators prior to or at the time of  
22 the leak, with respect to gas storage well  
23 failure investigations, and then it includes  
24 sub-questions. Do you see that?

25 A Yes.

26 Q Okay. If we can now move to  
27 Exhibit Number SoCal -- Exhibit SoCalGas-127,  
28 which is SED's response to this request.

1           Ms. Felts, do you see here this is  
2 marked SoCalGas-127.0001?

3           A    Yes.

4           Q    And this is SED's response to that  
5 data request?

6           A    Can you make it a little bigger?

7           Q    Yes.

8           A    Thank you.

9           MR. STODDARD:  And again, if we can  
10 scroll down to question 5, please.

11          Q    And you'll see here that the  
12 question again was:

13                Are you aware of the policies or  
14 practices of other gas storage operators  
15 prior to or at the time of the leak, with  
16 respect to gas storage well failure  
17 investigations.

18                And the -- were you involved in the  
19 preparation of this response, Ms. Felts?

20          A    I expect counsel may have called me  
21 and asked.

22          Q    Do you recall seeing this response?

23          A    I -- I'm sure I've seen it.

24          Q    But, you don't recall preparing any  
25 part of it?

26          A    No.

27          Q    Okay.  And you see SED's answer  
28 there, which is:

1 SED objects to this question as  
2 irrelevant. California Public Utilities Code  
3 Section 451 requires SoCalGas to operate its  
4 natural gas storage system safely for the  
5 public, its employees and patrons. To have  
6 safely operated its system in compliance with  
7 California Public Utilities Code Section 451  
8 prior to or at the time of the leak, it was  
9 SoCalGas's responsibility, not that of SED,  
10 to be aware of the policies and practices of  
11 other gas storage operators with respect to  
12 gas storage well failure investigations. Do  
13 you see that?

14 A Yes.

15 Q And then it goes on to object to  
16 the term gas storage -- other gas storage  
17 operators as overly broad, and then it refers  
18 to gas storage operators worldwide rather  
19 than those regulated in California, which is  
20 SED's jurisdiction. SED objects to the term  
21 other gas storage operators as vague. SED  
22 also objects to this request as unduly  
23 burdensome asking for SED's -- to ask all of  
24 its staff might be aware of such policies or  
25 practices of this undefined universe of gas  
26 storage operators. Do you see that?

27 A Yes.

28 Q And then the answer is:

1           Notwithstanding these objections,  
2           SED responds as follows: No.

3           Do you see that?

4           A     Yes.

5           Q     And that apparently is a "No"  
6           across the board. It's not providing an  
7           answer as to gas storage -- gas storage  
8           operators globally or those in California  
9           within SED's jurisdiction. Correct?

10          MR. GRUEN: Your Honor, I'm going to --  
11          I'm going to object to that line of  
12          questioning. It seems counsel's  
13          cross-examining the -- the witness,  
14          Ms. Felts, about SED's objections and using  
15          those to then suggest that the answer is  
16          something other than what it is. The -- the  
17          data response stands for itself. If they've  
18          got direct questions following up to what --  
19          what it is, they should ask.

20          MR. STODDARD: Your Honor, this is our  
21          cross-examination. This is a data response  
22          provided by SED in connection with questions  
23          we asked related to the witness's testimony,  
24          and the basis for SED's case, and I am  
25          clarifying what SED said here and confirming  
26          the witness's knowledge of it and involvement  
27          in preparation of the response.

28          ALJ HECHT: The objection is overruled.

1 You can continue to clarify that. You should  
2 be getting to some specific relevance  
3 shortly, I hope.

4 MR. STODDARD: That was actually all I  
5 had on this, so we can move on, anyway.

6 ALJ HECHT: All right. Go ahead.

7 MR. STODDARD: Although, actually,  
8 sorry. I didn't get an answer to the  
9 question.

10 THE WITNESS: Did you just ask me if I  
11 see that?

12 BY MR. STODDARD:

13 Q Yeah, just confirming that this --  
14 this answer, "No," is as to both gas storage  
15 operators globally as well as -- and it also  
16 answers "No" as to gas storage operators in  
17 California, which is within SED's  
18 jurisdiction.

19 A I see the response on there. I  
20 don't remember what my response to a similar  
21 question in the deposition might have been.  
22 So the only other operator that I could have  
23 ever possibly have had viewed any type of  
24 policy would be PG&E, and I don't recall  
25 that, as I sit here now.

26 Q Okay. Thank you. Ms. Felts, are  
27 you familiar with API Recommended Practice  
28 585?

1           A    I have read it.

2           Q    And API refers to the American  
3    Petroleum Institute.  Is that correct?

4           A    Yes.

5           Q    And the root cause analysis  
6    investigation process that you described  
7    yesterday which involved a determination of  
8    immediate cause, contributing causes, root  
9    cause and a systemic assessment for similar  
10   or related occurrences, that's based on the  
11   failure investigation procedures in API RP  
12   585.  Correct?

13          A    I've got API 585.  Maybe I'm not  
14   remembering properly, but I thought that  
15   was -- that had to do with pressure vessels.

16          Q    So you're saying API 585 doesn't  
17   apply to gas storage operations?

18          A    I think there was a recommended --  
19   recommendation by Blade that SoCalGas might  
20   consider that API 585 as a model if SoCalGas  
21   wanted to design its own investigations or  
22   policies or -- having to do with casings  
23   around that.  I think it was part of one of  
24   their recommendations as saying that API 585  
25   might be a good model.

26          Q    And it's part of -- of your  
27   recommendations, as well, isn't it?

28          A    Well, to the extent that I adopted

1 Blade's report, yes.

2 Q Okay. And you said you reviewed  
3 API 585. Correct?

4 A Well, I did review it when it --  
5 when I first saw the reference in the report,  
6 but I can't -- I can't tell you what's in it  
7 today, unless I look at it.

8 Q Okay. In terms of your general  
9 recollection and understanding, the process  
10 that you described for failure  
11 investigations, do you recall whether that's  
12 informed by or based on API 585?

13 A I remember 585 as having to do with  
14 pressure vessels, which would be like a  
15 boiler, and -- and so, other than -- unless I  
16 looked at it, I couldn't tell you. I didn't  
17 spend a whole lot of time evaluating that, as  
18 it was a forward-looking rec- --  
19 recommendation.

20 Q Okay. And are you aware of any  
21 similar recommended practice or standard that  
22 applies to gas storage facilities?

23 A In the -- in the Blade report, or  
24 just generally?

25 Q Generally.

26 A No. I -- right now, I don't -- I'm  
27 not familiar with any. There could be some  
28 that are being written as we speak.

1 MR. STODDARD: If we could please  
2 introduce Exhibit 58.

3 ALJ HECHT: Please describe the exhibit  
4 briefly.

5 MR. STODDARD: And this is SoCalGas --  
6 Southern California Gas Company's Fifteenth  
7 Set of Data Requests to the Safety and  
8 Enforcement Division.

9 Q Ms. Felts, do you see this  
10 document?

11 A Yes.

12 Q And you see it says, "Southern  
13 California Gas Company's Fifteenth Set of  
14 Data Requests to the Safety and Enforcement  
15 Division. And do you see that?

16 A Yes. ]

17 Q And that is Bates stamped  
18 SoCalGas-580001 on the bottom right-hand  
19 corner?

20 A Yes.

21 Q And you see that this was marked as  
22 an exhibit in the deposition we had last  
23 month?

24 A Yes.

25 Q Okay. If we could please turn to  
26 Question 2. And Question 2 says, "Do you  
27 contend that API RP 585 applies to gas  
28 storage facilities prior to the incident?"

1 Do you see that?

2 A Yes.

3 Q And Question 3, "Do you contend  
4 that API RP 585 applies to gas storage  
5 facilities as of the date of this data  
6 request?"

7 A Yes.

8 Q And if we could please turn to  
9 SoCalGas' response. This will be Exhibit  
10 SoCalGas-59.

11 Ms. Felts, do you see this  
12 document?

13 A Yes.

14 Q Did you assist in the preparation  
15 of this document?

16 A Probably.

17 Q It's titled -- it has the  
18 proceeding caption or proceeding number  
19 I.19-06-016 Safety and Enforcement Division  
20 Response to SoCalGas Data Request 15. It is  
21 marked SoCalGas-59.0001.

22 This was also, you can see  
23 Ms. Felts, an exhibit in your recent  
24 deposition last month. Do you see that?

25 A Yes.

26 Q Okay. If we can please turn down  
27 to the responses in numbers two and three.

28 Ms. Felts, do you see on the page

1 -- we can turn down, just so I can read the  
2 Bates number on the bottom of the page,  
3 SoCalGas-59.0002.

4 Question 2, "Do you contend that  
5 API RP 585 applies to gas storage facilities  
6 prior to the incident?"

7 And the answer, "SED objects to  
8 this question as vague, ambiguous and unduly  
9 burdensome asking a question without first  
10 identifying which piece of SED's testimony  
11 that SoCalGas is asking about. SED further  
12 objects as mischaracterizing SED's testimony  
13 because SED's reference to API RP 585  
14 provided Blade Energy Partners' opinion on it  
15 pursuant to the Administrative Law Judge's  
16 ruling.

17 And then Question 3, "Do you  
18 contend that API RP 585 applies to gas  
19 storage facilities as of the date of this  
20 data request?"

21 Again, SED states objection and  
22 then refers to SED's testimony and then  
23 provides the following answer:

24 Having said that, SED  
25 refers SoCalGas to  
26 Ms. Felts' testimony  
27 Chapter One, page 5, which  
28 states: In response to

1 SED's data request, Blade's  
2 provided its basis for  
3 including it, referring to  
4 API 585 as follows:

5 Although API 585 was no  
6 specifically for gas  
7 storage projects, Blade  
8 identified it as a solution  
9 as part of their root cause  
10 analysis. Blade then  
11 explained why it believed  
12 that API RP 585 could be  
13 applied to gas storage  
14 projects. Bladed added its  
15 professional opinion that  
16 it would be a safe practice  
17 for SoCalGas to apply API  
18 RP 585 to gas storage well  
19 integrity management and  
20 the response for doing so.

21 Do you see that?

22 A Yeah.

23 Q Okay. Then, again, do you now  
24 recall being involved in the preparation of  
25 the data response?

26 MR. GRUEN: Your Honor, if I may. This  
27 is Darryl Gruen for Safety and Enforcement  
28 Division. I would like to note an objection

1 to this line of questioning, this actual  
2 tactic, as highly prejudicial. This is a  
3 tactic that SoCalGas has been employing now  
4 for more than two days. And the record will  
5 show that they are continuously asking  
6 Ms. Felts to recall something and then  
7 withholding information from her and then  
8 asking, "Gee. Did you get something wrong or  
9 did you say something slightly differently  
10 than what you're telling us now?"

11 Your Honor, I would make a motion  
12 that from here on, SoCalGas be required to  
13 show upfront any information that it wants  
14 Ms. Felts to answer questions about and they  
15 can then ask her if she agrees or disagrees  
16 with the responses, deposition transcripts,  
17 what have you.

18 MR. STODDARD: Your Honor, this is a  
19 cross-examination, and we provided all these  
20 exhibits in advance of the cross-examination.  
21 I don't understand exactly what the basis for  
22 SED's objection is, but I also haven't asked  
23 any of the questions that Mr. Gruen suggests  
24 that I asked here. I am simply establishing  
25 -- because he had insisted that we refer to  
26 documents throughout this, I am referencing  
27 documents as he has requested as we have been  
28 instructed to do so, but I haven't yet asked

1 any question that Mr. Gruen described in his  
2 objection.

3 MR. GRUEN: Your Honor, Mr. Stoddard is  
4 referencing exhibits, and SoCalGas I will  
5 note has provided more than a hundred  
6 exhibits in reference.

7 What we're asking, to avoid the  
8 prejudice, is that Ms. Felts be shown the  
9 documents upfront and be asked questions  
10 about them, not questions and then ask  
11 whether she is recalling or if she said  
12 something slightly different than how she has  
13 put it now being required to reconcile what's  
14 been provided.

15 They should provide the documents  
16 upfront and ask her her basis or ask  
17 questions about her being forthright and  
18 upfront with the exhibits.

19 MR. STODDARD: Again, your Honor, this  
20 is cross-examination and we are entitled to  
21 ask the witness questions based on the  
22 documents that are in front of her. The  
23 Administrative Law Judges can accord it the  
24 appropriate weight based on the testimony  
25 it's provided on the record.

26 MR. GRUEN: Your Honor, no one has  
27 disputed that it's a cross-examination. That  
28 much is obvious to all.

1           The point is exactly as Mr. Stoddard  
2 said. The documents aren't always in front  
3 of her. They should be put there.

4           ALJ HECHT: All right. I am going to  
5 sustain the objection only in part to the  
6 extent possible. I believe that the  
7 documents should be identified in advance.  
8 That was the purpose of asking that they be  
9 served a day in advance and everybody has  
10 complied with that, which I appreciate.

11           I don't think it's unreasonable to  
12 ask for a list of the documents that are  
13 going to be consulted on a given day or that  
14 you think are likely to be consulted on a  
15 given day.

16           Having said that, I think asking  
17 whether somebody recalls the testimony or was  
18 involved in it, I don't find the questions  
19 themselves objectionable.

20           What I am trying to get to is to  
21 ensure that the witness has sufficient  
22 information to formulate an answer.

23           MR. STODDARD: Understood, your Honor.  
24 And if the witness, you know, and again we  
25 will -- I think that it will become apparent  
26 where our line of cross-examination is going  
27 here in a few moments.

28           ALJ HECHT: Are you waiting on me?

1 MR. STODDARD: No. We can move on.

2 So, if we can introduce Safety and  
3 Enforcement Division's Supplemental Response,  
4 Southern California Gas Company Data Request  
5 No. 15, which is Exhibit Number 60, and if we  
6 can turn to Question 2. Let me identify this  
7 document first.

8 This is Safety and Enforcement  
9 Division Supplemental Response to Southern  
10 California Gas Company's Data Request No. 15,  
11 Questions 1a, 1e-f, 2, 3, 4a, 5a-b, 11a-b and  
12 12a-c. Scroll down. This is marked  
13 SoCalGas-60.001.

14 And, Ms. Felts, you will see this  
15 was an exhibit in your deposition last month  
16 as well. Do you see that?

17 A Yes.

18 Q Okay. If we could scroll down to  
19 Question 2. Question 2 again is whether you  
20 contend that API RP 585 applied to gas  
21 storage facilities prior to the incident. Do  
22 you see that, Ms. Felts?

23 A Yes.

24 Q And in response -- SED's response  
25 to Question 2, I won't restate all the  
26 objections, but they are there.

27 And then in the second paragraph  
28 you will see it says:

1                   Subject to and without  
2                   waiver of these objections,  
3                   SED reiterates that it is  
4                   the opinion of Blade Energy  
5                   Partners that API RP 585  
6                   applied to gas storage  
7                   facilities prior to the  
8                   incident.

9                   Do you see that?

10                  A    Yes.

11                  Q    And then it says, "To understand  
12                  the basis of Blade's opinion" and it refers  
13                  back to a data response from Blade Energy  
14                  Partners to SED which we discussed a few  
15                  moments ago. Do you see that?

16                  A    Yes.

17                  Q    Okay. If we could please turn to  
18                  the response to Question 3, again, Question 3  
19                  was whether you contend that API RP 585  
20                  applies to gas storage facilities as of the  
21                  date of this data request.

22                               And, again, in response to Question  
23                               3, SED stated objections which I will not  
24                               reiterate.

25                               And in the second paragraph, SED  
26                               stated:

27                               Subject to and without  
28                               waiver of these objections,

1 SED reiterates that it is  
2 the opinion of Blade Energy  
3 Partners that API RP 585  
4 applied to gas storage  
5 facilities prior as of the  
6 date of this data request.  
7 Do you see that?

8 A Yes.

9 Q Ms. Felts, do you understand that  
10 sentence to be saying SED reiterates that it  
11 is the opinion of Blade Energy Partners and  
12 API RP 585 applied to gas storage facilities  
13 as of the date of the data request?

14 A That's what it says.

15 Q Were you involved in the  
16 preparation of this data response?

17 A I probably discussed it with  
18 counsel --

19 Q Do you recall -- sorry. You  
20 weren't done.

21 A Well, if you asked me the same  
22 question in my deposition, I would like to  
23 see the question and how it was couched so I  
24 could remember it, but I don't.

25 And so, I mean, if you're asking me  
26 if I actually prepared this response, the  
27 answer is no, I don't -- I did not actually  
28 prepare it, but I am sure that we discussed

1 it.

2 Q I am not planning to refer to your  
3 deposition but I will refer to your testimony  
4 a few moments ago.

5 Ms. Felts, a few moments ago I  
6 believe you said the API RP 585 was a  
7 forward-looking recommendation and it doesn't  
8 apply to gas storage facilities, correct?

9 A I think I was saying it was a  
10 forward-looking recommendation of Blade as I  
11 recall it. And apparently Blade responded to  
12 a data request and said that they think it  
13 does apply, although, you know, that's  
14 something you should take up with Blade when  
15 they're here.

16 Q Well, we have Blade's data request  
17 below which we can read.

18 Do you recall any discussion of  
19 interpretation of that data response with  
20 SED?

21 A No.

22 MR. GRUEN: I'm sorry, your Honor, just  
23 clarification. This is an objection as to  
24 vague.

25 Is counsel referring to the Blade  
26 data request? And if so, could we see it, so  
27 that Ms. Felts can make an informed answer?

28 BY MR. STODDARD:

1           Q    Okay.  On the screen, let's read  
2 below:

3                    To understand the basis of  
4 Blade's opinion, SED issued  
5 a data request to Blade  
6 Energy Partners.  As noted  
7 in Ms. Felts' Sur-Reply  
8 Testimony, Chapter One,  
9 page 5, lines 1  
10 through 7...

11                   Do you see that?

12           A    Yes.

13           Q    (Continuing reading.)

14                    In response to SED's data  
15 request, Blade provided the  
16 basis for including it as  
17 follows:  Although API 585  
18 was not specifically for  
19 gas storage projects, Blade  
20 identified it as a solution  
21 as part of their root cause  
22 analysis.  Blade then  
23 explained why it believes  
24 that API RP 585 could be  
25 applied to gas storage.  
26 Blade added its  
27 professional opinion that  
28 it would be a safe practice

1           for SoCalGas to apply it --  
2           API RP 585 -- to apply API  
3           -- I'm sorry. Strike that.  
4           Blade added its  
5           professional opinion that  
6           it would be a safe practice  
7           for SoCalGas to apply API  
8           RP 585 to gas storage well  
9           integrity storage  
10          management and the reasons  
11          for doing so. To show the  
12          detail of these points,  
13          Blade's data response is  
14          attached to this testimony.  
15          And that's quoting back to your  
16          sur-reply testimony. Do you see that,  
17          Ms. Felts? ]

18           A    Yes.

19           Q    Do you think that that quote  
20           supports the statement above that API -- that  
21           Blade Energy Partners' opinion was that  
22           API RP 585 applied to gas storage facilities?

23           A    I think it says what it says, that  
24           Blade says that its professional opinion is  
25           that it would be a safe practice for SoCalGas  
26           to apply API RP 585 to gas storage well  
27           integrity management, and I think their  
28           recommendation was because there isn't any

1 direct API RP for well integrity management,  
2 so they were reaching for the most applicable  
3 one.

4 Q That wasn't my question, Ms. Felts.  
5 My question was do you think that the  
6 Blade -- Blade's response that we just reread  
7 supports the response above from SED  
8 characterizing the opinion of Blade as being  
9 the API RP 585 applied to gas storage  
10 facilities?

11 A Are you talking about the paragraph  
12 just above that quote?

13 Q Yes.

14 A Okay. I think --

15 Q You can take a moment to read it if  
16 you like.

17 A I think the paragraph above  
18 characterizes Blade's response incorrectly.

19 Q Thank you. And it's actually  
20 consistent with the testimony you provided a  
21 few moments ago, isn't it, which is that  
22 API RP 585 applies to pressure vessels which  
23 would be like a boiler; correct?

24 A I don't understand the first part  
25 of your statement. I don't know what we're  
26 agreeing to.

27 Q Before we started looking at these  
28 data requests, I asked you whether API RP 585

1 applied to gas storage facilities; correct?

2 A Yes.

3 Q And you recall saying at that time  
4 that it didn't. It was a forward-looking  
5 recommendation and that it applied to  
6 pressure vessels like a boiler.

7 Do you recall saying that?

8 A Yes.

9 Q Okay. And what I'm saying -- what  
10 I'm asking is isn't it the case that Blade's  
11 response that -- or that your sur-reply  
12 testimony based on Blade's response that is  
13 quoted here is more consistent with what  
14 you've testified to today than SED's data  
15 response above, which states that API RP 585  
16 applied to gas storage facilities?

17 A Yes.

18 Q Thank you. You see there where it  
19 states, "Ms. Felts is aware of no reason to  
20 doubt Blade Energy Partners' opinion on this  
21 matter at this time"?

22 A Yes.

23 Q So this response is not just  
24 generally SED's response. This is also your  
25 response at the time that it was given;  
26 correct?

27 MR. GRUEN: Your Honor, I'm going to  
28 object to that question as a misstatement of

1 the data response. If we go back, SoCalGas  
2 has clear definitions of the term "you," and  
3 SoCalGas has clarified that this witness, the  
4 witness, that this is a data response of SED.  
5 So, I think it's important to clarify for the  
6 record that point, that it misstates  
7 testimony to that extent.

8 MR. STODDARD: Your Honor, all I did  
9 was read what it says on the face of the data  
10 response, which is that "Ms. Felts is aware  
11 of no reason to doubt Blade Energy Partners'  
12 opinion on this matter at this time." This  
13 clearly is referring to the witness'  
14 knowledge and testimony and I was simply  
15 trying to confirm that with Ms. Felts.

16 ALJ HECHT: I am overruling the  
17 objection. I think that the question -- I  
18 think it cannot necessarily be said that that  
19 mischaracterizes. I will say it was a very  
20 complicated question and I would appreciate  
21 it if you could state it more clearly.

22 MR. STODDARD: Okay.

23 Q The last sentence there, Ms. Felts,  
24 says "Ms. Felts is aware of no reason to  
25 doubt Blade Energy Partners' opinion on this  
26 matter at this time."

27 Do you see that?

28 A Yes.

1 Q And again above, it characterized  
2 Blade's opinion, if we can scroll back up a  
3 little bit, as "The opinion of Blade Energy  
4 Partners is that API RP 585 applied to gas  
5 storage facilities prior as of the date of  
6 this data request."

7 Do you see that?

8 A Yes.

9 Q Again, Ms. Felts, do you recall  
10 being consulted with respect to the content  
11 of this data response?

12 A I'm sure that --

13 MR. GRUEN: Objection, asked and  
14 answered.

15 ALJ HECHT: I agree. Objection  
16 sustained. That has been asked and answered.

17 Please continue.

18 BY MR. STODDARD:

19 Q Ms. Felts, in the last sentence  
20 where it states that you are aware, you  
21 personally, Ms. Felts, are "aware of no  
22 reason to doubt Blade Energy Partners'  
23 opinion on this matter," that's referring to  
24 the opinion that is described in the  
25 paragraph that starts "Subject to and without  
26 waiver of these objections"; correct?

27 A That applies to the quote that's  
28 inset in the middle of this paragraph.

1           Q    I see.  So, you were not consulted  
2 then on SED's response which was that  
3 API RP 585 did apply in Blade's view to gas  
4 storage operations?

5           MR. GRUEN:  Your Honor, this has been  
6 asked and answered multiple times at this  
7 point.  I would renew my objection.

8           MR. STODDARD:  Your Honor, counsel for  
9 SED has been objecting in the middle of  
10 questions and I am simply trying to get to  
11 the end of a line of questioning to confirm  
12 with two contradictory opinions on the page  
13 which one Ms. Felts agrees with and whether  
14 or not SED consulted her before providing  
15 contradictory answers.

16           ALJ HECHT:  This is the last  
17 opportunity.  Please complete the line of  
18 questioning and move on.

19 BY MR. STODDARD:

20           Q    Ms. Felts, can you answer the  
21 question?

22           A    I think I told you yesterday in  
23 response to a more generic question about who  
24 prepared these data responses to SED data  
25 requests, and I told you that counsel in  
26 general prepared the responses and consulted  
27 me on technical issues.  I'm sure I was -- I  
28 discussed this with them.  As far as the

1 consent of this response, my response would  
2 be exactly what is inset on this page, not  
3 the paragraph above it. There's possibly a  
4 misunderstanding between counsel and I when  
5 we had that discussion.

6 Q Thank you. Ms. Felts, again, with  
7 respect to API RP 585, which you have  
8 testified did not apply to gas storage  
9 operations and you are not aware of any  
10 similar standard that does apply, but to  
11 confirm, you believe an investigation should  
12 have been done that's consistent with what is  
13 described in API RP 585 for the prior  
14 failures of the Aliso Canyon facility; is  
15 that correct?

16 MR. GRUEN: Your Honor, I'm going to  
17 object to that question as compound.

18 ALJ HECHT: I don't think that's stated  
19 correctly so I don't agree with it.

20 BY MR. STODDARD:

21 Q Okay. Ms. Felts, yesterday you  
22 testified that the sort of investigation that  
23 you believe would have been appropriate for  
24 the prior failures would have included a  
25 determination of the immediate cause, the  
26 root cause, and the systemic assessment for  
27 similar or related occurrences.

28 Do you agree with that?

1           A    I don't think I used the word  
2    "systemic," but maybe you used it and I might  
3    have agreed to it.  So in general, yes, we  
4    discussed investigations thoroughly  
5    yesterday.

6           Q    Okay.  And so if you would use a  
7    word different from systemic, what would you  
8    use?

9           A    I don't know.  It just doesn't  
10   sound like a word that I would have said.

11          Q    Okay.  Ms. Felts, are you aware  
12   that API RP 585 was published in the first  
13   edition in April 2014?

14          A    No.

15          Q    Can we please introduce  
16   Exhibit 135, API Recommended Practice 585.  
17   Ms. Felts, do you see here this is titled  
18   "Pressure Equipment Integrity Incident  
19   Investigation"?

20          A    Yes.

21          Q    And "API Recommended Practice 585,  
22   First Edition, April 2014."

23                    Do you see that?

24          A    Yes.

25          Q    And you indicated you reviewed this  
26   document at some time during the course of  
27   your work for SED; correct?

28          A    Yes.

1           Q    Okay.  And it's Bates stamped  
2   SoCalGas-135.0001.  So, for the failure  
3   investigation that you believe should have  
4   been done, again, what was the basis for the  
5   component of that investigation?

6           A    It's my experience as an engineer  
7   and my past experience of doing  
8   investigations.  I don't think there's  
9   anything special about investigating wells.  
10   Obviously, the technical aspects of it may  
11   vary, but the steps to do an investigation  
12   are pretty similar for any event that you  
13   want to find the cause of.

14          Q    Was it common knowledge?

15          A    At least in the engineering  
16   community.

17          Q    If so, what's the point of  
18   publishing a recommended practice -- sorry,  
19   strike that.

20                What's the point of the American  
21   Petroleum Institute publishing a recommended  
22   practice on integrity incident investigations  
23   that is 47 pages long?

24          A    I expect that there were probably  
25   some boiler explosions and that the industry  
26   itself, since it is the American petroleum  
27   industry, felt like there was a good reason  
28   to draft and produce this particular

1 recommended practice so that everybody would  
2 have guidelines to use on their facilities.

3 Q So they would be developing kind of  
4 a standard practice in response to an  
5 incident; is that correct?

6 A Probably more than one incident.  
7 And so the -- I mean the American petroleum  
8 industry probably has good reason to create  
9 standards among their members so that  
10 everybody is doing things consistently and  
11 has the latest thought along this process or  
12 about this process.

13 Q And it's correct that the Blade  
14 report references the API 585 as the basis  
15 for the type of investigation that they  
16 recommend; correct?

17 A Well, I think they just recommended  
18 that it's a safe practice that SoCalGas could  
19 apply, so basically it points SoCalGas to a  
20 document that could be a jumping off point to  
21 create your own, or SoCalGas' own, incident  
22 investigation policies or procedures.

23 ALJ HECHT: Before you continue, I am  
24 going to ask that everybody remember to speak  
25 slowly and clearly, especially when reading  
26 from documents because one tends to speed up  
27 at that time. In particular, Mr. Stoddard, I  
28 think the court reporters would appreciate it

1 if you would slow down a little bit.

2 MR. STODDARD: Thank you, your Honor.  
3 I apologize for speaking too quickly.

4 ALJ HECHT: Thank you.

5 MR. STODDARD: If we could please turn  
6 to Ms. Felts' opening testimony, the  
7 corrected version, Exhibit Number  
8 SoCalGas-47. ]

9 Do you see that this is Ms. Felts'  
10 opening testimony in the instant proceeding,  
11 and it is Bates marked SoCalGas-47.0001? If  
12 we could please turn to page 79.

13 MR. GRUEN: And for the record, your  
14 Honor, just a clarification, is -- is that  
15 referring to the page 79 in the Bates numbers  
16 or at the bottom of the testimony page?

17 MR. STODDARD: I was referring to the  
18 page numbers, because I'm working off of a  
19 hard copy, but I will read the Bates number,  
20 as well.

21 MR. GRUEN: Understood. Thank you.

22 BY MR. STODDARD:

23 Q So this is page 79 of the testimony  
24 in PDF Bates number SoCalGas-47.0083. Do you  
25 see that?

26 A Yes.

27 Q And if we can scroll up to solution  
28 number seven, Ms. Felts, do you see there

1 where it says, "American Petroleum" -- sorry.

2 Solution number seven, SoCalGas  
3 should be required to do a Level 1 analysis  
4 of all failures, and this is again in your  
5 testimony. American Petroleum Institute,  
6 API, Recommended Practice 585, pressure  
7 equipment integrity incident investigation,  
8 discusses failure investigation of pressure  
9 equipment. The Aliso Canyon wells are a form  
10 of complex pressure vessels. A Level 1 type  
11 of an analysis of failures as a minimum  
12 requirement will identify the immediate  
13 causes of the failures or near misses, and  
14 allow operators to understand the  
15 implications, if any. Do you see that?

16 A Yes.

17 Q And so this -- and it cites to the  
18 Blade report. Correct?

19 A Yes.

20 Q And this is the sort of  
21 investigation that Blade contends should have  
22 been done. Correct?

23 A No.

24 Q No?

25 A I don't think so. I think this is  
26 in their solutions, and this is a  
27 recommendation. It says that -- it cites API  
28 Recommended Practice 585 for pressure

1 equipment, then says that Aliso Canyon wells  
2 are complex pressure vessels, and therefore,  
3 you know, it's applicable. Level 1 type  
4 analysis of failures will identify immediate  
5 causes. So I think this is just one of  
6 several solutions that were at the end of the  
7 Blade report for going forward. I don't  
8 think it's looking back.

9 Q Thank you. Thank you, Ms. Felts.  
10 For what you are contending should  
11 have been done, which includes  
12 identification, immediate cause, root cause,  
13 and an assessment of -- and I won't use the  
14 word systemic -- similar occurrences  
15 throughout the facility, is that consistent  
16 with a Level 1 type analysis, or is it more?

17 A Well, I think Level 1 is a part of  
18 the requirement. It's just stating that this  
19 should be a Level 1 analysis of all failures.  
20 So I mean, as far as the investigation  
21 process that we discussed yesterday, I think  
22 that's pretty much a generic description of  
23 doing an investigation, and I would say that  
24 that applies going forward, as well, as  
25 looking at API Recommended Practice 585.

26 Q I was asking whether the -- the  
27 elements of the investigation that you  
28 contend should have been done in --

1 previously exceeds the description of a  
2 Level 1 type analysis of failures described  
3 in the last sentence here. And I can read --  
4 reread it, if helpful.

5 A Level 1 type of analysis of  
6 failures as a minimum requirement will  
7 identify the immediate causes of the failures  
8 or near misses, and allow operators to  
9 understand the implications, if any.

10 ALJ HECHT: Another reminder to please  
11 slow down, especially when you're reading.

12 MR. STODDARD: Thank you, your Honor.  
13 I apologize.

14 THE WITNESS: All right. I guess I  
15 don't understand the difference -- I don't  
16 understand what you're asking me. Everything  
17 seems to be written right there in that  
18 paragraph.

19 BY MR. STODDARD:

20 Q Okay. I'll -- I'll move on.

21 A Okay.

22 Q Finally, one more question on this:  
23 Ms. Felts, yesterday for your description of  
24 the failure analysis that should have been  
25 done, which again included identification of  
26 immediate cause, root cause and an assessment  
27 of similar failures and implications  
28 throughout the field that were -- I believe,

1 if that's a fair characterization, you  
2 indicated that that should have been done for  
3 all of the prior leaks that occurred.

4 Correct?

5 A Yes, the ones that are identified  
6 in the opening testimony. That's not all of  
7 the leaks that have occurred.

8 Q No distinction -- you didn't  
9 identify and you don't believe there's any  
10 distinction in the failure analysis that  
11 should have been performed for leaks that  
12 occurred in 2001 versus 2014. Correct?

13 MR. GRUEN: I'm sorry, your Honor. I'm  
14 going to object to that question as vague.  
15 If Ms. Felts could be shown the testimony  
16 that's being asked about.

17 MR. STODDARD: I don't have a  
18 transcript from these proceedings over the  
19 past few days, unfortunately, so I'm not  
20 going to be able to -- to accurately show her  
21 testimony.

22 ALJ HECHT: For clarity, please restate  
23 your question --

24 MR. STODDARD: Thank you, your Honor.

25 ALJ HECHT: -- and we'll go from there.

26 BY MR. STODDARD:

27 Q Ms. Felts, you described, you know,  
28 your description of a failure investigation

1 that was required was as you stated in your  
2 testimony yesterday, and I won't characterize  
3 it. Okay?

4 In your view, that type of  
5 investigation should have been performed for  
6 failures that occurred in 1980, 1970 or 1969  
7 or 1952. Correct?

8 MR. GRUEN: And again, your Honor, I'm  
9 going to object as vague. There are points  
10 in Ms. Felts's opening testimony that can be  
11 referenced to. If counsel could point her to  
12 opening testimony that -- that he's asking  
13 questions about.

14 MR. STODDARD: I think my question's  
15 fairly straightforward, and doesn't require  
16 consultation of her testimony, unless -- and  
17 I'm -- I'm -- you know, the witness is  
18 sitting here. This is her testimony. She  
19 should be able to speak to it. I'm not  
20 referencing her opening testimony right now  
21 beyond the solutions identified in the back  
22 of her testimony.

23 MR. GRUEN: Well, that's exactly the  
24 concern in the objection, that counsel should  
25 be referencing the testimony.

26 ALJ HECHT: I think this is a  
27 straightforward question, and the over -- the  
28 objection is overruled.

1                   We'll continue for another five  
2 minutes or so, and then we will take a  
3 morning break.

4                   Mr. Stoddard, continue.

5 BY MR. STODDARD:

6                   Q    Ms. Felts, did you understand the  
7 question?

8                   A    Well, you've asked me two different  
9 questions, so if you're asking me does the  
10 process of investigating a leak as I  
11 described in our discussions yesterday apply  
12 to every leak that SoCalGas has seen or that  
13 has occurred at Aliso Canyon, then I would  
14 say, "Yes."

15                  Q    Okay. We can move on.

16                            If you can refer back to  
17 Exhibit 47, the corrected testimony, opening  
18 testimony of SED in this proceeding, page 27,  
19 and you'll see here this is SoCalGas-47.0031,  
20 do you see that, Ms. Felts?

21                  A    Just a minute. Let me -- yes.

22                  Q    And the second full paragraph  
23 halfway down -- and I apologize we don't have  
24 line numbering in here, but that's how it was  
25 produced.

26                            Do you see where -- the sentence  
27 that starts "Further"?

28                  A    Yes.

1           Q    "Further, since no formal risk --  
2 risk assessment was conducted regarding well  
3 integrity, wall thickness inspection was not  
4 identified as a monitoring technique."

5                    Do you see that, Ms. Felts?

6           A    Yes.

7           Q    To clarify, do you contend that  
8 SoCalGas was unaware of casing inspection  
9 tools?

10          A    No.

11          Q    No. In fact, SoCalGas had been  
12 experimenting with casing inspection tools  
13 prior to the incident, and prior even to  
14 1990. Correct?

15          A    In 2014, as a precursor to the SIMP  
16 program, they were experimenting with  
17 technologies. I don't know about your  
18 additional statement about 1990.

19          Q    Well, you -- you've identified,  
20 which we'll get to in a moment, the 1988 memo  
21 which relates to the use of Vertilog for  
22 inspection of some wells. Correct?

23          A    I don't know if that was actually  
24 experimentation with a technology; but, okay.

25          Q    So Ms. Felts, your statement here,  
26 which is no -- since no formal risk  
27 assessment was conducted regarding well  
28 integrity, wall thickness inspection was not

1 identified as a monitoring technique, doesn't  
2 have to do with SoCalGas's awareness of the  
3 tools. Correct?

4 A That's correct.

5 Q Could it also be the case that wall  
6 thickness inspection was not identified as a  
7 monitoring technique prior to some -- some  
8 specific point in time, because the  
9 technology was unreliable?

10 A I'm not sure which technology  
11 you're talking about, but measuring wall  
12 thickness is very old, and reliable  
13 technique. I mean USIT technology has been  
14 around for a long time.

15 Q Since when?

16 A I -- I don't know a date.

17 Q Okay. If we could please turn to  
18 page 22. This is SoCalGas-47.0026, and  
19 this -- the top sentence there.

20 Do you see the catastrophic SS-25  
21 casing leak showed that using temperature  
22 surveys to confirm mechanical integrity of  
23 casing was a flawed concept? Do you see  
24 that?

25 A Yes.

26 Q So the importance of measuring  
27 wall -- well wall thickness was not fully  
28 appreciated until the SS-25 incident. That's

1 what that says, isn't it?

2 A I don't see that in that sentence.

3 Q It says, "The catastrophic SS-25  
4 casing which showed that using temperature  
5 surveys to confirm mechanical integrity of  
6 casing was a flawed concept." Do you see  
7 that?

8 A Yes.

9 Q This suggests that the incident  
10 itself was what indicated that the use of  
11 well integrity monitoring tools on casing  
12 inspection logs was important for purposes of  
13 well integrity. Correct?

14 A What I see in that sentence, it  
15 just says that the leak that occurred there  
16 shows that temperature surveys alone to  
17 confirm mechanical integrity of a casing is a  
18 flawed concept. I don't see what else you're  
19 reading into that. Perhaps that's somewhere  
20 else in that.

21 Q As shown by the catastrophic SS-25  
22 casing leak, the first part of the sentence  
23 that you didn't read.

24 A Uh-huh. Yes.

25 Q Okay.

26 A I -- I'm sorry. I just don't  
27 understand what you're doing here.

28 Q I'm asking -- anyways, we can move

1 on.

2 If we can move to page 25,  
3 SoCalGas-47.0029, if we can scroll up.  
4 Sorry. I think we need to scroll down a  
5 little bit, please.

6 One second. We need to go off the  
7 record. One moment. I need to find my  
8 place.

9 ALJ HECHT: We'll be off the record.

10 (Off the record.)

11 ALJ HECHT: We'll be back on the  
12 record.

13 While we were off the record, the  
14 cross-examining attorney found the  
15 information that he needed in testimony -- in  
16 the exhibit, excuse me, and I found that  
17 there won't be very many questions left in  
18 this line of cross, so after that, we will  
19 take a break.

20 Go ahead, Mr. Stoddard.

21 MR. STODDARD: If we can please bring  
22 back up Exhibit Number 47, and this is the  
23 page identified prior to the break. And  
24 the -- the sentence under header four reads:

25 SoCalGas had no internal policies on  
26 wall thickness inspections because the  
27 company assumed that regulatory compliance  
28 was being adhered to by running annual

1 temperature surveys in accordance with the  
2 Aliso Canyon monitoring plan and the project  
3 approval letter dated 1989 requiring an  
4 annual mechanical integrity test.

5 Q Do you see that, Ms. Felts?

6 A Yes.

7 Q So use of the word "assumed" above,  
8 are you contending that SoCalGas did not  
9 comply with regulatory requirements?

10 A No.

11 Q No. In fact, SoCalGas did comply  
12 with applicable regulatory requirements.  
13 Isn't that correct?

14 A SoCalGas convinced DOGGR that  
15 temperature surveys were appropriate and  
16 would suffice, and so DOGGR, in my  
17 understanding, went along with that, and  
18 created that as the requirement.

19 Q And what's the basis for your --  
20 your -- your opinion that -- that SoCalGas  
21 convinced DOGGR?

22 A Well, seems like I saw that in a --  
23 in a letter or a memo, probably some kind of  
24 communication between SoCalGas and DOGGR.  
25 But --

26 Q Are you -- are you referring to  
27 the -- to the rulemaking proceeding in  
28 which -- the public rulemaking proceeding in

1 which DOGGR officially said that noise and  
2 temperature logging was sufficient for  
3 compliance in mechanical integrity testing?  
4 Is that what you're referring to, Ms. Felts?

5 A I have not seen that public  
6 proceeding, if that's what you're referring  
7 to. If I saw something, it would have been  
8 correspondence between DOGGR and SoCalGas.

9 Q Are you aware of any reason at that  
10 time for SoCalGas or DOGGR to believe that  
11 noise and temperature logging were not  
12 sufficient and compliant with regulations?

13 A I would say that there is probably  
14 evidence in SoCalGas's history that it wasn't  
15 sufficient, but it doesn't mean that DOGGR  
16 was aware of that. I just -- you know, I  
17 don't have enough information to know what  
18 they were thinking.

19 Q Okay. Thank you.

20 That's all, your Honor.

21 ALJ HECHT: All right. We're going to  
22 take a 15-minute break. We'll be back at  
23 11:20, and we'll be off the record.

24 (Off the record.)

25 ALJ HECHT: We'll be back on the  
26 record.

27 We were off the record just for a  
28 15-minute morning break. We are going to

1 resume the cross-examination. I will note  
2 that I've rearranged my schedule, so I no  
3 longer have a hard stop this afternoon, which  
4 does not mean that we can go as late as we  
5 want, or until 4:30, but it does give a  
6 little bit more flexibility.

7 With that, we can resume the  
8 cross-examination. Mr. Stoddard.

9 MR. STODDARD: Thank you, your Honor.

10 If we could turn back, please, to  
11 Exhibit Number 47, corrected version of SED's  
12 opening testimony, and turn to page -- pages  
13 10 to 11, and this is Bates number  
14 SoCalGas-47.0014. And if we move up -- stop  
15 there, please.

16 Q Can you see there, in the second  
17 paragraph, the first sentence that says:

18 SoCalGas's failure to follow its  
19 own 1988 plan to check the casing in 12 wells  
20 for metal loss violates Section 451"? Do you  
21 see that, Ms. Felts?

22 A Yeah. Yes.

23 Q To explain a little bit, for  
24 purposes of -- of those in attendance today,  
25 including the administrative law judges,  
26 discuss a little bit of the background on  
27 Vertilog briefly. Vertilog is a -- is a  
28 magnetic flex -- flux leakage tool. Correct?

1           A    Yes.

2           Q    And it's designed to detect the  
3 potential wall loss in steel casings.  
4 Correct?

5           A    Yes, it -- it does do that.

6           Q    It does do that.  Okay.  And it  
7 could be wall loss due to any number of  
8 factors.  Correct?

9           A    Yes.  It doesn't care what the  
10 factor is.

11          Q    So it could be due to corrosion,  
12 mechanical damage or erosion.  Correct?

13          A    Yes.

14          Q    Okay.  And -- and in this instance,  
15 based on your understanding from what you've  
16 read in the Blade report, there was -- there  
17 was wall loss in the SS-25 casing prior to  
18 the failure.  Correct?

19          A    Yes.

20          Q    And that wall loss was due to  
21 corrosion.  Correct?

22          A    Yes.

23          Q    And when do you believe that  
24 corro- -- the corrosion in SS-25 began?

25          A    I -- I don't have personal opinion  
26 on that.  I don't think -- I don't think you  
27 can tell when that started.

28          Q    Okay.  Would you agree that the

1 allegation that it was a violation of 451 in  
2 connection with your testimony related to the  
3 Aliso Canyon incident assumed that there was  
4 detectable corrosion back in 1988 at the time  
5 that there was the internal memorandum  
6 recommending performance of Vertilog  
7 inspections on SS-25, among other wells?

8 A I think that Blade said that it was  
9 possible that it could have been detected in  
10 1988.

11 Q But, we don't know. Right?

12 A If you didn't look in 1988, then  
13 you don't know.

14 Q And we can't tell necessarily based  
15 on the corrosion and wall loss that was  
16 present when the casing was extracted,  
17 either. Correct?

18 A No.

19 Q And what is your understanding  
20 regarding the reliability of the Vertilog  
21 tool?

22 A My understanding is that, in 1988,  
23 SoCalGas considered it reliable enough to  
24 invest in to investigate wall loss in well  
25 casings.

26 MR. STODDARD: If you could please turn  
27 to Exhibit Number 35, page 308, line 18. And  
28 this is the deposition of Margaret Felts in

1 Los Angeles, California of February 5th,  
2 2020, morning session, SoCalGas -- sorry,  
3 that's -- that's incorrect. This was a --  
4 this was a deposition in San Francisco. It  
5 was transcribed in Los -- and it's  
6 SoCalGas-35.0001.

7 Q Do you see that?

8 A Yes.

9 Q All right. If we could please go  
10 to page 308, line 18, and the questioning  
11 began -- sorry. I started a little bit above  
12 that.

13 I was asking you about your  
14 experience with Vertilog, and at line 16 the  
15 question was: How about interpreting  
16 Vertilogs?

17 And you said, "Yes."

18 And the question -- the next  
19 question was: Vertilogs specifically?

20 And the answer was: Yes, I've read  
21 those.

22 And the question was: In -- in  
23 what context?

24 Answer: Well, beginning in school,  
25 I had a whole course on that, and then over a  
26 period of time, I have had occasion in  
27 private consulting cases to look at well  
28 logs.

1 Do you see that?

2 A Yes.

3 Q And then the question is: Again,  
4 we're talking specifically about Vertilogs  
5 here?

6 And the answer is: Well, I think a  
7 Vertilog is one of many different kinds of  
8 logs, so I'm sure I've looked at them. I  
9 just can't tell you exactly which case, what  
10 date.

11 ALJ HECHT: Once again, I'm going to  
12 ask Mr. Stoddard to slow down in the reading.  
13 I know it is very hard to do that,  
14 particularly when you're reading, but it is  
15 helpful for our court reporters.

16 MR. STODDARD: I'm sorry, your Honor.  
17 I'm -- I apologize to the court reporters, as  
18 well. I will slow down.

19 ALJ HECHT: Thank you.

20 BY MR. STODDARD:

21 Q Next question: And what is your  
22 understanding regarding the reliability of  
23 Vertilog, the Vertilog tool?

24 And your answer is: There were  
25 probably some issues with them over time.  
26 They've probably gotten a lot better  
27 recently.

28 Do you see that?

1 A Yes.

2 Q And this is based on your -- this  
3 isn't based on the Blade report. Right?

4 A Right.

5 Q This appears to be based on your  
6 personal recollection and experience.  
7 Correct?

8 A And what I've read, yes.

9 Q And this was -- this deposition  
10 occurred before SoCalGas served its  
11 testimony. Correct?

12 A I don't really know that.

13 Q SoCalGas's reply testimony was  
14 served March 20th, 2020, and this deposition  
15 occurred on February 5th, 2020?

16 A Okay. I believe you.

17 Q Okay. Thank you.

18 If you turn, please, to Ms. Felts'  
19 sur-reply testimony in Exhibit Number 51, and  
20 it's going to be Chapter 2, page 11. This is  
21 marked SoCalGas-51.0001. It's the sur -- the  
22 sur-reply testimony of Ms. Felts. And -- and  
23 this is from Chapter 2, the prepared  
24 sur-reply testimony of Margaret Felts in  
25 response to reply testimony of Robert A.  
26 Carnahan, SoCalGas-51.0040. And we're  
27 turning to page 11 of this chapter of  
28 Ms. Felts' certified testimony, and here,

1 this is page SoCalGas-51.0052.

2 And if we can scroll up a little  
3 bit, please, you'll see here that the format  
4 of this testimony is that Mr. Carnahan  
5 provided testimony on behalf of SoCalGas.  
6 SED asked Blade data requests about  
7 Mr. Carnahan's statement, and then took  
8 Blade's responses and cut and pasted them  
9 into their reply testimony.

10 Do you see that, Ms. Felts? ]

11 A Can you make it a little bit bigger  
12 so I can see it?

13 Q Yes, of course. If you could  
14 please scroll down. Do you see here,  
15 Ms. Felts, where it says, "When SED asked  
16 Blade's data request --" I'm sorry. I will  
17 read Mr. Carnahan's statement first.

18 Carnahan Statement 5 down below,  
19 Mr. Moshfegh.

20 Additional flaws of  
21 Vertilog were its inability  
22 to distinguish between  
23 defects and hardware, such  
24 as centralizers and  
25 scratchers and its  
26 difficulty interpreting  
27 corrosion located near the  
28 surface casing shoe.

1           That was Mr. Carnahan's testimony.  
2       SED then asked Blade a data request about it.

3           And your testimony then states:

4           When SED asked Blade a data  
5           request about this  
6           statement, Blade stated  
7           that it disagreed with it.

8           When asked to explain,  
9           Blade stated as follows:

10          Blade would agree that the  
11          tool will have difficulty  
12          interpreting corrosion  
13          above but not below the  
14          shoe. Blade agrees with,  
15          quote, 'flaws of Vertilog  
16          were its inability to  
17          distinguish between defects  
18          and hardware, such as  
19          centralizers and  
20          scratchers.'

21          The next sentence, which is part of  
22          this blocked quote is:

23          However, there is a key  
24          omission in Mr. Carnahan's  
25          testimony regarding the  
26          method in which the tool  
27          designers had envisioned  
28          solving this issue.

1                   References described the  
2                   use of accurate casing  
3                   records to address the  
4                   interpretation of  
5                   centralizers and  
6                   scratchers.

7                   Do you see that, Ms. Felts?

8                   A    Yes.  Yes.

9                   Q    What are centralizers and  
10                  scratchers?

11                  A    A centralizer I think holds  
12                  something in the middle of the casing.  I  
13                  don't know what a scratcher is without  
14                  looking it up.

15                  Q    Okay.  And do you know where  
16                  they're located?

17                  A    In general or --

18                  Q    In general or specifically?

19                  A    I wouldn't even know how to answer  
20                  that.

21                  Q    Okay.  Did you review SoCalGas'  
22                  records for the location of centralizers and  
23                  scratchers?

24                  A    No.  This is strictly an issue  
25                  between Carnahan and Blade.  So I would  
26                  suggest maybe asking Blade about this.

27                  Q    So you did ask Blade about it.  So  
28                  why don't we turn to their response.  If we

1 could refer to Exhibit 70 please, page 13.

2 ALJ HECHT: We'll be off the record  
3 while we find the place in the exhibit.

4 (Off the record.)

5 ALJ HECHT: Okay. We'll be back on the  
6 record.

7 BY MR. STODDARD:

8 Q This is the Blade's Data Response  
9 to CPUC Data Request 50 -- Data Request  
10 SED-58 related to Vertilog technology and the  
11 casing failure in SS-25 from reply testimony  
12 of Mr. Robert Carnahan on behalf of SoCalGas.  
13 And the page number on the front page of this  
14 document is SoCalGas-70.001.

15 If we could please scroll down to  
16 page 13.

17 Ms. Felts, you see here where it  
18 says -- let me read. It restates the quote  
19 that you -- that you included in your  
20 testimony under Item 2 there. Do you see  
21 that?

22 A I am going to have to look on my  
23 copy. I just can't --

24 Q Okay. Please do. If we can go  
25 back off the record for a moment so Ms. Felts  
26 can grab her copy.

27 ALJ HECHT: We'll be off the record.

28 (Off the record.)

1 ALJ HECHT: All right. I will go back  
2 on the record. We'll be on the record.

3 BY MR. STODDARD:

4 Q Ms. Felts, do you see Statement 5?

5 A Yes.

6 Q And, again, it's:

7 Additional flaws of  
8 Vertilog were its inability  
9 to distinguish between  
10 defects and hardware, such  
11 as centralizers and  
12 scratchers and its  
13 difficulty interpreting  
14 corrosion located near the  
15 surface casing shoe."

16 Do you see that?

17 A Yes.

18 Q And those are two different points,  
19 are they not?

20 A Do you mean that centralizers and  
21 scratchers are two different points or that  
22 centralizers and scratchers and the  
23 difficulty interpreting corrosion are two  
24 different points?

25 Q The two different points -- I'm  
26 asking whether -- and let me rephrase. I  
27 apologize for being unclear.

28 The point that Mr. Carnahan is

1 making here it appears is Vertilog's  
2 inability to distinguish between defects and  
3 hardware is one. And the second point is its  
4 difficulty interpreting corrosion located  
5 near the surface casing shoe is two.

6 A Yes.

7 Q Okay. And in Blade's response,  
8 they state, "Disagree." And then they  
9 explain under Item 2.5.1 number 2 as to why.  
10 And the first sentence there is, "Blade would  
11 agree that the tool will have difficulty  
12 interpreting corrosion above but not below  
13 the shoe."

14 Do you see that?

15 A Yes.

16 Q Okay. And that appears to answer  
17 the second part of Mr. Carnahan's point as to  
18 difficulty interpreting corrosions located  
19 near the surface casing shoe. Would you  
20 agree?

21 A Yes.

22 Q Okay. And then the next paragraph  
23 addresses Mr. Carnahan's first point, which  
24 is that Blade agrees with the flaws of the  
25 Vertilog were its inability to distinguish  
26 between defects and hardware. And it goes on  
27 to explain.

28 Would you agree this addresses

1 Mr. Carnahan's first point?

2 A Yes.

3 Q Okay. And then he explains that  
4 that's because of the fact, or rather then he  
5 goes on to address the issue about the  
6 location of centralizers and scratchers and  
7 records, correct?

8 A Just a minute. Let me read it.

9 ALJ HECHT: We'll be off the record.

10 (Off the record.)

11 ALJ HECHT: We'll be back on the  
12 record. Go ahead.

13 THE WITNESS: Okay. Could you restate  
14 the question?

15 BY MR. STODDARD:

16 Q I will just ask a different  
17 question, since I have now forgotten what I  
18 have said and I can't read back the  
19 transcript. I apologize.

20 If we can scroll down to Question  
21 3, the next question is, "Is there any  
22 context either in or outside of  
23 Mr. Carnahan's testimony that Blade wishes to  
24 add in order to explain its answers? If so,  
25 please provide it and explain."

26 Do you see that?

27 A Yes.

28 Q And the answer is, "In Blade's

1 opinion, the Vertilog may overstate metal  
2 loss in multi-string casing configurations  
3 where an outer casing exists over part of the  
4 casing being inspected."

5 Do you see that?

6 A Yes.

7 Q What Blade is saying here is that  
8 Vertilog overstates corrosion if it's  
9 inspecting an issue within the production  
10 casing where it is within the surface casing  
11 shoe; isn't that correct, Ms. Felts?

12 A That would apply, yes.

13 Q So you would agree that that's what  
14 they're saying, Ms. Felts?

15 A Yes.

16 Q Thank you. If we can scroll back  
17 up, please.

18 And, Ms. Felts, do you recall where  
19 the leak occurred in SS-25?

20 A Below the surface casing. I don't  
21 know the exact depth without looking it up.

22 Q Below the surface casing shoe?

23 A Yes.

24 Q If we could refer back to  
25 Ms. Felts' testimony, Exhibit 51, page 11.  
26 Ms. Felts, you quote the entirety of  
27 Mr. Carnahan's statement there, correct, both  
28 its inability to distinguish between defects

1 in hardware and its difficulty interpreting  
2 corrosion located near the surface casing  
3 shoe, correct?

4 A Right.

5 Q But you only provide part of  
6 Blade's answer; isn't that correct?

7 A Which part is missing?

8 Q Well, you didn't include I guess  
9 the part that explains that "Vertilog may  
10 overstate metal loss in multi-string casing  
11 configurations where an outer casing exists  
12 over part of the casing being inspected,"  
13 unless I am mistaken.

14 A Well, yes. That's not there. I  
15 agree.

16 Q Is there a reason you left it out?

17 A I don't recall exactly. My guess  
18 is it's probably because I didn't think it  
19 was relevant.

20 Q Okay. And, Ms. Felts, did you  
21 assist with preparation of that data request  
22 that we were just reviewing to Blade?

23 A I discussed it with counsel. I did  
24 not prepare the data request.

25 Q Okay. If we could please refer to  
26 Exhibit 51 again the Sur-Reply Testimony of  
27 Ms. Felts at Chapter One, page 9, PDF  
28 page 11. I can read the -- there we go.

1 This is Bates marked SoCalGas-51.0011. And  
2 if we could please scroll back up where it  
3 says -- I'm sorry. Can we go off the record  
4 for one second? We're in the wrong spot  
5 here.

6 ALJ HECHT: We'll be off the record to  
7 find the place in the exhibit.

8 (Off the record.)

9 ALJ HECHT: We'll be back on the record  
10 now that the exhibit is found.

11 MR. STODDARD: Thank you, your Honor.

12 Q At the bottom here where it says:  
13 Violations 61 to 72 were  
14 for failure to follow the  
15 company's internal 1988  
16 plan to check casings of 12  
17 wells, other than SS-25,  
18 for metal loss as  
19 recommended by its own  
20 engineers. The 58 holes  
21 are examples of locations  
22 in Well SS-25 that  
23 experienced corrosion  
24 before the failure.

25 Do you see that, Ms. Felts?

26 MR. GRUEN: I'm sorry. This is Darryl  
27 Gruen of SED. I am just not tracking what  
28 page we are on.

1 MR. STODDARD: It's page 9 of  
2 Ms. Felts' Sur-Reply Testimony, Chapter One.

3 MR. GRUEN: Thank you.

4 MR. STODDARD: And it's marked -- the  
5 Bates number is marked page 51.0011.

6 MR. GRUEN: Understood. Thank you.

7 BY MR. STODDARD:

8 Q Ms. Felts, the testimony that I  
9 just read into the record, you can see that  
10 highlighted text there?

11 A Yes.

12 Q Can you explain the relationship  
13 between the 58 holes described in the second  
14 sentence and the company's -- and the alleged  
15 failure of the company to follow the internal  
16 1988 plan to check casings of 12 wells?

17 A I think -- I mean, I would have to  
18 look at this separately to see the whole  
19 document. But it looks like this should be a  
20 reference to Violation 73, which was for  
21 SS-25 not following the 1988 plan, if I  
22 recall correctly. Because I -- in the second  
23 sentence, I am talking about 58 holes in  
24 SS-25. So these two don't match up. I'm  
25 sorry. That's probably my mistake.

26 Q I'm not sure I follow. Are you  
27 saying that the first sentence is incorrect  
28 because it should reference --

1           A    Yes.

2           Q    -- it should reference Violation  
3    73?

4           MR. GRUEN:  Your Honor, if I could  
5    object to this line.  This is vague.  
6    Ms. Felts isn't being given a chance to see  
7    the entire document.

8           MR. STODDARD:  Your Honor, this is  
9    literally the witness' testimony.  And if she  
10   wants to take a moment to review it, I'm  
11   happy to let her do that.

12          ALJ HECHT:  She can have a moment to  
13   review it.  The questions are referring to  
14   testimony and to specific portions of  
15   testimony.  So we can take a couple of  
16   minutes for the witness to refresh herself.  
17   We'll be off the record.

18                    (Off the record.)

19          ALJ HECHT:  We'll be back on the record  
20   now that the witness has had a chance to  
21   review the testimony.  Please go ahead.

22          THE WITNESS:  Okay.  To clarify, the  
23   sentence that begins on line 15 should say  
24   Violation 73 was the violation for failure to  
25   follow the company's internal 1980 plan to  
26   check casing of SS-25 for metal loss.

27                    So, on line 15, 61-72 should be  
28   replaced with 73.  And that's confirmed by

1 the end of the paragraph on the next page  
2 where I state that it's the basis of  
3 Violation 73.

4 ALJ HECHT: This is Judge Hecht. It  
5 sounds like there needs to be revisions to  
6 this testimony which should be prepared and  
7 served on all parties, if what you are doing  
8 is modifying your testimony. That's how it  
9 appeared, but.

10 THE WITNESS: Yes. I am correcting an  
11 error.

12 ALJ HECHT: I think your counsel then  
13 knows how to make that correction and make  
14 sure that everybody has the corrected  
15 testimony. That also means that this copy in  
16 the Southern California Gas Company exhibits  
17 will no longer quite match that testimony.

18 MR. STODDARD: Your Honor, with the  
19 timing, is there any specific intentions to  
20 the timing of that correction or can we just  
21 continue to rely on this version?

22 ALJ HECHT: I think we can continue to  
23 rely on this version knowing that that  
24 correction has been made, but I do want a  
25 corrected copy. And the corrected copy is  
26 what I would prefer to identify and mark when  
27 we put things in the record.

28 MR. STODDARD: Understood.

1 MR. GRUEN: Understood, your Honor.

2 BY MR. STODDARD:

3 Q Ms. Felts, so you made a correction  
4 there. That wasn't actually what my question  
5 was about. My question was about the  
6 relationship between not the number of the  
7 violation so much as the allegation regarding  
8 the failure to follow the company's internal  
9 1988 plan to check the casing of 12 wells for  
10 metal loss and the 58 holes which you  
11 identified as "examples of locations in Well  
12 SS-25 that experienced corrosion before the  
13 failure."

14 A Yes.

15 Q Is that your answer, yes?

16 A Is there a question? You just read  
17 it.

18 Q I was asking you to explain the  
19 relationship between those two sentences. Is  
20 that second sentence related to Violation 73?

21 A Yes.

22 Q Okay. Can you please explain how?

23 A Because there was metal loss in the  
24 surface casing that could have been detected,  
25 if they had followed their internal 1988 plan  
26 to check the casings.

27 Q Okay. So, in your view, Vertilog  
28 in 1988 was capable of detecting corrosion on

1 the surface casing?

2 A Didn't we just read that in Blade's  
3 statement?

4 Q No.

5 A Well, if you're looking at multiple  
6 casings, then you would be looking at both  
7 the production casing and the surface casing.  
8 So, theoretically, they should have been able  
9 to see corrosion. They may not have been  
10 able to quantify it perfectly, but they  
11 should have been able to see it.

12 Q Using the Vertilog tool that  
13 existed in 1988?

14 A I think that is what Blade was  
15 suggesting and what I adopted.

16 Q And you -- in the deposition we  
17 were looking at a few moments ago, you were  
18 testifying as to your own personal experience  
19 with the Vertilog tool, correct?

20 A Actually, mostly what I was  
21 testifying to was my personal experience with  
22 logs. And I believe I said in my deposition  
23 that I have read a Vertilog at some point,  
24 maybe more than once. I don't remember the  
25 exact wording, but mostly in my deposition I  
26 was talking about my experience with logs.

27 Q And what is the purpose of reading  
28 a log?

1           A     What's the purpose?

2           Q     Yeah.  What do you read a log to  
3     do?

4           A     To determine what the data reveals  
5     from logging the well.

6           Q     And by that you mean wall loss,  
7     correct?

8           A     Well, that would be the case in  
9     USIT or Vertilog or possibly other  
10    technologies that are around now.  There's  
11    lots of other logs that you can run that have  
12    nothing to do with wall loss or metal loss.

13          Q     Okay.  But for any log I suppose in  
14    order to interpret a log, you have to have  
15    some understanding of how it works, how it's  
16    calibrated and, you know, its degree of  
17    reliability; would you agree with that?

18          A     I think so.

19          Q     Okay.  We can move on.  And bear  
20    with me.  I apologize, your Honor, and  
21    Ms. Felts.  I am trying to make sure that we  
22    move along as quickly as possible today.  So  
23    I am going to jump forward and every now and  
24    then cut some stuff out.  So if I pause for a  
25    moment, I may just be cutting things out of  
26    my outline.

27                 ALJ HECHT:  We'll be off the record.

28                         (Off the record.)

1 ALJ HECHT: We'll be back on the  
2 record. Please resume.

3 MR. STODDARD: Thank you. If we could  
4 please turn to Ms. Felts' opening testimony,  
5 Exhibit 47, the corrected version.

6 This reads -- again, this is the  
7 Opening Testimony of Margaret Felts dated  
8 November 22, 2019, cover page number  
9 SoCalGas-47.0001. And in the interest of  
10 speed if you could search for 892,  
11 Mr. Moshfegh, number 892.

12 ALJ HECHT: We'll be off the record.

13 (Off the record.)

14 ALJ HECHT: We'll be back on the  
15 record. ]

16 BY MR. STODDARD:

17 Q Ms. Felts, you see here where it  
18 states -- and actually let's get the Bates  
19 number, of course, before we read it.  
20 SoCalGas -47.0004(sic)?

21 Do you see that?

22 A 44? Two 4s?

23 Q 47.0044.

24 A Okay, yes.

25 Q If we could scroll up. And you'll  
26 see here it's a description of the corrosion  
27 and the failure location at SS-25. And then  
28 in the last sentence you say "See here," and

1 then it says:

2 The SS-25 casing corrosion  
3 area discovered 892 feet  
4 down the well by the RCA  
5 was 9.25 inches in length  
6 and contains grooves from  
7 tunnels created by the  
8 microbes that coalesced  
9 over a period --

10 And it continues, which we don't  
11 need to read the rest -- oh, sorry.

12 Continues over a period of  
13 time.

14 Do you see that, Ms. Felts?

15 A Yes.

16 Q So you see here that this is  
17 describing the failure location; correct?

18 A Yes.

19 Q And it's at 892 feet; correct?

20 A Yes.

21 Q Do you know the depth of the  
22 surface casing shoe?

23 A No, not without looking at a  
24 drawing.

25 Q Okay. I believe there is a drawing  
26 in your opening testimony. If we can go off  
27 the record briefly while we just locate a  
28 drawing.

1 ALJ HECHT: We'll be off the record.

2 (Off the record.)

3 ALJ HECHT: We'll be back on the  
4 record. While we were off the record, we  
5 found the drawing to which the  
6 cross-examining attorney wants to refer, and  
7 we determined that we will probably be taking  
8 a lunch break pretty soon.

9 MR. STODDARD: If we could scroll down,  
10 please, to the Bates number. This is  
11 SoCalGas-47.0047.

12 Q Do you see that, Ms. Felts?

13 A Yes.

14 Q If we could please scroll up.

15 Do you recognize this graphical  
16 image?

17 A I think it came from a Blade  
18 report.

19 Q And this is in your testimony;  
20 correct?

21 A Yes.

22 Q Can you locate the surface casing  
23 shoe here? Let us know if you need us to  
24 make it bigger or if you need to consult your  
25 own copy, please.

26 A I can't -- it's kind of blurry, but  
27 it looks like it says that the shoe is at 990  
28 feet or 930.

1 MR. STODDARD: I think it might be  
2 clearer on the one to the left, Mr. Moshfegh.

3 THE WITNESS: Just a minute. Let me  
4 just look on my computer. Maybe it's  
5 clearer. 900 and (inaudible) feet it looks  
6 like.

7 BY MR. STODDARD:

8 Q I'm sorry, Ms. Felts, it sounded  
9 like you'd moved away from your phone to  
10 review it. I wasn't able to hear.

11 A I'm sorry. 990 feet.

12 Q Thank you. So the leak -- I don't  
13 know if you recall the depth of the leak we  
14 were reviewing from your opening testimony,  
15 but if you do, isn't it correct that the leak  
16 was above this depth? It was above the  
17 surface casing shoe; correct?

18 A And we're talking about the well  
19 casing failure?

20 Q That's correct.

21 A That's what it looks like on here.

22 Q What's what it looks like?

23 A That it was above the well casing  
24 shoe.

25 Q The surface casing shoe; correct?

26 A Surface casing shoe, sorry.

27 Q Thank you. Do you recall a few  
28 moments ago when we're discussing the Blade

1 data response regarding the ability of  
2 Vertilog to detect corrosion above the  
3 surface casing shoe?

4 Do you recall that discussion,  
5 Ms. Felts?

6 A I recall the discussion. I don't  
7 remember if that applied to the surface  
8 casing or the production casing.

9 Q Do you recall how we reviewed --  
10 and we can go back and redo it if we need to,  
11 but if you'll bear with me and allow me to  
12 describe it for a moment and, if we need to,  
13 we can go back and review it.

14 Blade's data response stated that  
15 Vertilog would overstate the degree of  
16 corrosion within multiple layer casing  
17 strings. In other words, that where a  
18 production casing was within a surface  
19 casing, which would include above the surface  
20 casing shoe.

21 Do you recall that?

22 A Yes.

23 Q And at the time your answer was  
24 that the leak had occurred below the shoe;  
25 correct?

26 A Correct, that was my memory.

27 Q That was your memory. Right. Fair  
28 enough. And we discussed how you didn't

1 include that portion of Blade's explanation  
2 in your testimony because you did not believe  
3 it was relevant; correct?

4 A Right.

5 Q And you may not have believed it  
6 was relevant because you were mistaken as to  
7 the location of the failure; correct?

8 A That's possible.

9 Q Thank you.

10 No further questions, your Honor,  
11 at this time.

12 ALJ HECHT: All right. And I will ask,  
13 do we plan to continue with cross-examination  
14 of this witness after lunch?

15 MR. STODDARD: Yes.

16 ALJ HECHT: All right.

17 Then we are going to take our lunch  
18 break. We'll be back at 1:10. With that,  
19 we'll be off the record.

20 (Off the record.)

21 (Whereupon, at the hour of 12:07  
22 p.m., a recess was taken until 1:10  
p.m.) ]

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AFTERNOON SESSION - 1:10 P.M.

\* \* \* \* \*

MARGARET FELTS,

resumed the stand and testified further as follows:

ALJ POIRIER: We will be back on the record. This is evidentiary hearings for Investigation 19-06-016. It's March 18th. We're moving into the afternoon session. Before we broke for lunch, SoCalGas counsel was cross-examining SED witness Felts. We will continue with that cross-examination.

Please go ahead, Mr. Stoddard.

MR. STODDARD: Thank you, your Honor.

CROSS-EXAMINATION RESUMED

BY MR. STODDARD:

Q Ms. Felts, the other day, yesterday, I believe, we were talking about the kind of regulatory framework for gas storage operations in California. We were discussing how DOGGR is the primary regulator for down-hole operations.

Do you recall?

A Yes.

Q Do you know what the DOGGR mechanical testing requirements were prior to

1 the incident?

2 A I'm not sure what you mean. I  
3 think their initial requirements may have  
4 included a USIT, the USIT technology, but  
5 then at some point they changed to  
6 temperature surveys and then noise surveys.  
7 The temperature surveys indicated a leak.

8 Q Do you recall what your basis is  
9 for believing that DOGGR required the use of  
10 USIT?

11 A Probably some very early document.  
12 I can't tell you just sitting here.

13 Q Do you recall when you believe that  
14 DOGGR required USIT?

15 MR. GRUEN: Your Honor, I'm going to  
16 object to this line as vague. If counsel has  
17 something he wants to show the witness, I'd  
18 ask that he do so.

19 MR. STODDARD: Your Honor, I'm asking a  
20 question about the witness' recollection  
21 regarding a statement she just made on the  
22 record that USIT was required by DOGGR  
23 regulations. I'm not aware of that being in  
24 any of her testimony or elsewhere, so I can't  
25 point her to a document.

26 MR. GRUEN: Well, then if it's not in  
27 her testimony, why is it being asked?

28 MR. STODDARD: Because she just said

1 it. It's in her testimony that she said  
2 today.

3 ALJ POIRIER: I'm going to overrule it.  
4 Continue.

5 THE WITNESS: What I remember is, I  
6 think, a 1989 and possibly a 1991, letters  
7 from DOGGR about temperature surveys being  
8 required on an annual basis. I can't tell  
9 you where I might have seen something that  
10 had an earlier requirement. It was then  
11 changed. That's the best I can do for right  
12 now.

13 BY MR. STODDARD:

14 Q So you're not sure that such a  
15 document exists or such a requirement exists?

16 A Well, I don't think I dreamed it.

17 Q Okay. If we could please turn to  
18 Exhibit SoCalGas-145, which is the Agenda for  
19 the Department of Oil and Gas Annual  
20 Meeting -- Annual Review Meeting for Aliso  
21 Canyon, May 26, 1988.

22 ALJ POIRIER: Let's go off the record.  
23 When you're ready to proceed,  
24 counsel, in the right location, let me know.

25 (Off the record.)

26 ALJ POIRIER: Back on the record.

27 Please continue, Mr. Stoddard.

28 MR. STODDARD: Thank you, your Honor.

1           Q    Ms. Felts, do you see here this  
2 document entitled Agenda for DOG Annual  
3 Review Meeting for Aliso Canyon, May 26,  
4 1988?

5           A    Yes.

6           Q    And for purposes of the record,  
7 this is Bates stamped SoCalGas-145.0001, and  
8 you'll note above that a production Bates  
9 number for a production to the PUC SED in  
10 connection with Data Response 17.

11                    If you could please scroll up.  
12           Q    Ms. Felts, do you recognize this  
13 document?

14           A    Yes.

15           Q    Okay.  If we could please turn to  
16 page two.  The Bates number is the same as  
17 the previous one except that it's .0002.  
18 This is the table of contents for this  
19 document and it includes the categories of  
20 Geology, Project Performance, Engineering,  
21 Conservation, Pollution Prevention, and  
22 Operations.

23                    Do you see that, Ms. Felts?

24           A    Yes.

25           Q    If we could please turn to page 19  
26 of this document.  And rotate.  Thank you.

27                    This is titled Table 5, Summary of  
28 the Aliso Canyon Monitoring Program Storage

1 Zone Wells. It's Bates stamped the same  
2 number as before, Exhibit 145.0019.

3 Ms. Felts, do you see here in the  
4 item column where it describes various  
5 practices undertaken by SoCalGas?

6 A Yes.

7 Q And this includes slow tests,  
8 wellhead pressures, plot of surface casing  
9 annular pressures, wellhead inspections,  
10 temperature surveys, noise logs, tracer  
11 surveys.

12 Do you see that, Ms. Felts?

13 A Yes.

14 Q If we could turn now to -- I  
15 apologize. Off the record for one second. I  
16 just lost my page.

17 ALJ POIRIER: Off the record.

18 (Off the record.)

19 ALJ POIRIER: Back on the record.

20 MR. STODDARD: Let's turn to page 0039  
21 in Exhibit 145. Please rotate to landscape  
22 view.

23 Q Thank you for bearing with us.  
24 Ms. Felts, do you see here that this says --  
25 the header of this document is Operations,  
26 April 1987 through April 1988. It reports on  
27 the new wells drilled, well work-overs  
28 conducted, wells that were converted to

1 observation wells, and wells that were  
2 abandoned.

3 Do you see that there?

4 A Yes.

5 Q Okay. Can you briefly explain what  
6 an observation well is.

7 A I think SoCalGas had observation  
8 wells to monitor potential gas movement and  
9 then in -- below the ground, and then also to  
10 measure -- two wells were used to measure the  
11 reservoir pressure. I'm not sure if they  
12 were observation wells or they just selected  
13 wells. I don't know. I -- they're just not  
14 completed in the gas zone for the purpose of  
15 producing gas.

16 Q Thank you. And at the bottom  
17 you'll note that SoCalGas reported also to  
18 DOGGR, "No unusual incidents or problems have  
19 occurred since the last DOGGR annual review  
20 meeting."

21 Do you see that?

22 A Yes.

23 Q So these meetings were annual and  
24 it included these reports on activities. And  
25 you reviewed this document, you indicated.

26 Do you recall when you reviewed it?

27 A I've seen it within the last few  
28 months.

1           Q    Since you submitted the final  
2 testimony?

3           A    No.  It would have been since --  
4 probably since December.

5           Q    So after your last round of  
6 testimony -- or since December of which year?

7           A    This would be 2020.  It was either  
8 December 2020 or January 2021 when I looked  
9 at these annual reports.

10          Q    Okay.  So after your sur-reply  
11 testimony in this proceeding?

12          A    Yes.

13          Q    Okay.  If we could please turn to  
14 Exhibit 147, Agenda for DOGGR Annual Review  
15 Meeting for Aliso Canyon, June 13, 1989.  
16 This is Bates stamped SoCalGas-147.0001.  
17 You'll note above that this was produced in  
18 response to SED Data Request 27.  If we could  
19 please turn to page -- I'll skip the table of  
20 contents since -- well, I guess it's -- just  
21 to confirm we can turn to page two and three.

22                Ms. Felts, do you see this is Bates  
23 stamped 147.0003.  And similar to the last  
24 document, it has a table of contents that  
25 includes Geology, Project Performance,  
26 Conservation, Pollution Prevention, and  
27 Operations.

28                If we could please turn to page 20.

1                   And I won't belabor the point, but  
2                   you'll notice that this includes the same  
3                   description of procedures that SoCalGas had  
4                   in the last annual review; correct?

5                   A     Yes.

6                   Q     And then if we can turn to page 23.

7                   Ms. Felts, you see here this is a  
8                   report of leaks to DOGGR.

9                   Do you see that?

10                  A     It's a report, yeah, for this  
11                  meeting, the annual report, yeah.

12                  Q     Right, for the period May 1988  
13                  through 1989?

14                  A     Yes.

15                  Q     And you'll note that it identifies  
16                  four shoe leaks, including some that had been  
17                  going on for a little while; correct?

18                  A     Yes.

19                  Q     And this is being reported to DOGGR  
20                  in an annual meeting in this report. This  
21                  suggests, wouldn't you agree, that SoCalGas  
22                  didn't necessarily -- wasn't concerned that  
23                  these would be viewed as an emergency, would  
24                  you agree?

25                  A     What I see here is that they had an  
26                  indication on a temperature survey of a shoe  
27                  leak that they may have confirmed with a  
28                  noise log or a survey and that they decided

1 that they could afford to just let the gas  
2 leak without investigating further.

3 Q Where does it say anything about  
4 investigation?

5 A Well, it doesn't, but it says "not  
6 killed," which means that you're not going to  
7 look further than you've already looked  
8 because you would have to kill the well in  
9 order to do that. And that says "not killed"  
10 because rate of leakage is low.

11 Q And they're reporting this to  
12 DOGGR; is that correct?

13 A Yes.

14 Q This doesn't suggest that SoCalGas  
15 is viewing this as a secret, would you agree?

16 A No, I don't think it's a secret.

17 Q No. And this also doesn't indicate  
18 that it's a violation of law, would you  
19 agree?

20 A I don't think there were any laws  
21 as far as leakage.

22 Q Can you explain.

23 A Well, if they -- if SoCalGas  
24 chooses to allow the gas to leak out of their  
25 well at the bottom of the well, I don't think  
26 there's a law that says they can't do that.

27 Q Okay. Thank you. And it also  
28 suggests, given the timeline, that DOGGR

1 would have been aware of the fact that these  
2 leaks that occurred and that SoCalGas was  
3 allowed, you know -- and that SoCalGas was  
4 reporting on the fact that the rate of  
5 leakage was low and, therefore, they weren't  
6 going to kill the well and conduct a  
7 work-over; correct?

8 A I think that's correct.

9 Q Okay. If we can turn back to  
10 page 0020 for a moment through 0022. If you  
11 need to take a moment, Ms. Felts, you can.  
12 But can you please -- and you may know since  
13 you reviewed this document -- is USIT  
14 identified anywhere on this document?

15 A No. This is pretty much the  
16 standard format for all of those annual  
17 reports.

18 Q Thank you. If we could please turn  
19 to the last page, 0049. And, Ms. Felts, here  
20 on the Operations, May 1988 through May 1989,  
21 you'll note new wells drilled again, well  
22 work-overs, well converted to observation,  
23 and wells abandoned.

24 Do you see that?

25 A Yes.

26 Q And under "Well work-overs," this  
27 identifies casing inspections that were  
28 performed on wells P-46, SS-8, SS-9, and

1 P-37.

2 Do you see that?

3 A Yes.

4 Q These are the same wells that were  
5 identified in the 1988 memo; correct?

6 A I think so.

7 Q And the casing inspection being  
8 referred to here is probably the Vertilog  
9 inspection.

10 Would you agree?

11 A That was my understanding, that  
12 they were running Vertilog, yes.

13 Q And, Ms. Felts, again, you reviewed  
14 this document, you saw this page sometime in  
15 the past few months?

16 A Sometime, yes, around the first st  
17 of the year or since then.

18 Q And this data response -- this was  
19 provided in response to SED DR 27, which was  
20 a very long time ago. I think we're now on  
21 150 something. Is there any reason why you  
22 didn't look at it until the past couple  
23 months?

24 A I don't think that I've had these  
25 files until -- well, I don't -- I can't tell  
26 you exactly when I had them, but I didn't  
27 have them before I wrote my testimony. I  
28 think we had asked -- might have asked

1 SoCalGas to reproduce them, but I'm not sure.

2 Q Okay. Reproduced them because they  
3 couldn't be located after they had been  
4 produced in response to Data Requests 17 and  
5 27?

6 A I think that's the case. I  
7 remember asking for, I think, both of those.  
8 I'm just not sure how we ended up getting the  
9 well -- the files eventually.

10 Q Okay. If we could please turn to  
11 exhibit -- oh, just before I move on from  
12 this one.

13 Ms. Felts, the date of that one  
14 again was June 13, 1989. And you'll recall  
15 that the date of the memo that you are  
16 asserting violations on in your testimony is  
17 August of 1988; correct?

18 A Yes.

19 Q Okay. If we could please turn to  
20 CalPA-401. This is the DOGGR project  
21 approval letter for Aliso Canyon dated --  
22 I'll wait until you get there. There we go.  
23 Again, this is the DOGGR project approval  
24 letter for Aliso Canyon dated April 18, 1989,  
25 revised July 26, 1989.

26 Do you see that?

27 A Yes.

28 Q Okay. If we could scroll down to

1 the Bates number. This is Bates Number  
2 I1906016\_SED\_CalAdvocates\_000001. If we can  
3 scroll now to the second page of this  
4 document.

5 Ms. Felts, have you seen this  
6 document?

7 A I think I've seen it, oh, a long  
8 time ago.

9 Q Okay. And you see there in  
10 paragraph 9 -- paragraph 7 first actually, it  
11 describes:

12 A mechanical integrity test  
13 was made in --

14 Sorry, I'm reading too fast.

15 A mechanical integrity test  
16 was made and filed with  
17 this division for each  
18 injection withdrawal well  
19 within three months after  
20 injection and/or withdrawal  
21 has commenced, at least  
22 once every year thereafter  
23 after any significant  
24 anomalous rate or pressure  
25 change or as requested by  
26 this office.

27 Do you see that?

28 A Yes.

1           Q    And then in paragraph 8, it refers  
2 to a division-approved monitoring program.

3           A    Yes.

4           Q    And in paragraph 9, it includes the  
5 statement:

6                   The following data are  
7 maintained for surveillance  
8 and evaluation of the  
9 project and are made  
10 available for periodic  
11 inspection by personnel  
12 from this division.

13                  Paragraph A required:

14                   A graph of oil, water, and  
15 gas production rates versus  
16 time for each zone.

17                  Paragraph B requires:

18                   A graph of reservoir  
19 pressures, inventory  
20 fluctuations, and injection  
21 pressures.

22                  Paragraph C requires:

23                   Observation well data,  
24 reservoir fluid  
25 distribution, temperature,  
26 radioactive tracer and  
27 noise surveys.

28                  Do you see that?

1           A    Yes.

2           Q    Do you see any reference to USIT or  
3 Vertilog in this document, Ms. Felts?

4           A    No.

5           Q    If we could please turn to Exhibit  
6 Number 146. This is the 1990 DOGGR Annual  
7 Review Meeting for Aliso Canyon. You'll see  
8 here that this is Bates stamped  
9 SoCalGas-146.0001. Again, this was produced  
10 in response to SED Data Request 17.

11                   Ms. Felts, do you recognize this  
12 document?

13           A    Yes.

14           Q    Do you recall when you reviewed  
15 this document?

16           A    I'm pretty sure I reviewed all of  
17 these annual reports around the same time.

18           Q    Okay. If we could please scroll  
19 down to page 146.0002. Again, briefly this  
20 is a table of contents similar to the others  
21 that we described. If we could please  
22 proceed to SoCalGas 146.0022.

23                   Ms. Felts, you'll see here that  
24 this is, again, a list of, or a summary of  
25 the Aliso Canyon Monitoring Plan which lists  
26 SoCalGas' practices related to monitoring of  
27 wells and reservoir; correct?

28           A    Yes.



1           A    Yes.

2           Q    And for clarity of the record, I  
3 apologize, that -- those items I just listed  
4 were for several different wells, not for --  
5 all for FF 35C.

6                    So again, Ms. Felts, here it  
7 appears that SoCalGas is reporting to DOGGR  
8 the use of casing inspection tools in these  
9 instances, but also that they aren't part of  
10 a standard monitoring program.  Would you  
11 agree?

12           A    Yes.  I don't -- I don't know if  
13 repair casing leak, regravel pack on FF 35C  
14 indicates what you just said.

15           Q    I was referring to the inspect  
16 casing on Mission Adrian 5A --

17           A    Oh, okay.

18           Q    -- and inspect casings -- sorry.

19           A    Okay.

20           Q    Okay.  So you'd agree there?

21           A    Yes.

22           Q    Okay.  And again, Ms. Felts, you  
23 indicated that this is another document that  
24 you reviewed in the past couple of months,  
25 and you're not sure why you weren't able to  
26 review it earlier, but you didn't have access  
27 to it?

28           A    Yes.

1           Q     Okay.  And reviewing these now and  
2     seeing -- you know, so to kind of recap, go  
3     over the timeline, let me know if you need to  
4     bring any of the documents back up, but we  
5     have -- you know, this is just a -- a --  
6     three examples of these annual meetings with  
7     DOGGR, in the middle, issuance of a project  
8     approval letter, all of them detailing  
9     specific practices, both DOGGR is aware of  
10    the use of casing inspection logs; in fact,  
11    one of these issued two months after the  
12    meeting with DOGGR -- sorry.  One of these  
13    issued -- the project approval letter issued  
14    two week -- two months after the annual  
15    meeting with DOGGR, but there's no reference  
16    to requiring USIT or Vertilog or any other  
17    casing inspection tool.  Would you agree?

18           A     Well, I don't know what project  
19    approval letter you're talking about.

20           MR. STODDARD:  Will you please bring  
21    back up the project approval letter briefly  
22    so I can clarify that point?

23           ALJ POIRIER:  What exhibit is this, for  
24    the record?

25           MR. STODDARD:  This is Exhibit Number  
26    Cal Advocates-401.

27           Q     This is the project approval letter  
28    I'm referring to, Ms. Felts.  Do you see

1 this?

2 A Yes. Can you make it a little bit  
3 larger, and put it on the first page?

4 Q Of course. And if you need to  
5 access it separately, it's also available on  
6 the -- the exhibit share site. Can you take  
7 a moment to review?

8 ALJ POIRIER: Let's go off the record.

9 (Off the record.)

10 ALJ POIRIER: Back on the record.

11 Ms. Felts -- or Mr. Stoddard, why  
12 don't you ask the question again?

13 MR. STODDARD: Sure.

14 Q Ms. Felts, you see there that the  
15 date is July 26th, 1989?

16 A Yes.

17 Q And again, the Exhibit 147 that we  
18 were discussing earlier, which was the 1989  
19 DOGGR annual review meeting, that date was  
20 June 13th, 1989?

21 A Okay.

22 Q So this issued, you know,  
23 approximately -- the project approval letter  
24 issued approximately a month, I suppose,  
25 after the prior DOGGR annual meeting?

26 A Right. So this letter from DOGGR  
27 is what you're calling a project approval  
28 letter?

1 Q That's correct.

2 A Okay.

3 Q Do you -- do you have any reason to  
4 dispute that characterization?

5 A I just don't see it anywhere on the  
6 document.

7 Q So if we move -- if we go to the  
8 first paragraph where it states --

9 A Right.

10 Q -- at the bottom, "Therefore,  
11 continued operation of the project is  
12 approved, provided that," and then it lists 1  
13 through 6 on the first page, and items 7  
14 through 13 on the second --

15 A Okay. I see that.

16 Q And you did review this document.  
17 Correct?

18 A I have seen it before, yes.

19 Q Okay. But, it's been a while?

20 A Yeah.

21 Q Ms. Felts, seeing these documents,  
22 and with the -- the degree of involvement and  
23 oversight from DOGGR, including the detailed  
24 annual meeting report which you didn't have  
25 access to prior to preparing your testimony,  
26 does this change any of the conclusions in  
27 your testimony?

28 A I don't think so.

1 Q Okay. Move on.

2 If we could bring up Exhibit 47,  
3 the corrected opening testimony of Ms. Felts.  
4 Please turn to page 25. Can you zoom in a  
5 little bit, please, for the witness?

6 Ms. Felts --

7 MR. GRUEN: Sorry. Just for  
8 clarification, that -- is that referring --  
9 is that SoCalGas Bates number 47.0029?

10 MR. STODDARD: Yes. Thank you.

11 MR. GRUEN: Okay.

12 ALJ POIRIER: And this is ALJ Poirier.  
13 Just in -- as we move forward, zooming in a  
14 little bit would be helpful for me, as well.  
15 So I think if we can make that kind of  
16 standard practice, not so much as that --  
17 what we have now, but more than just that  
18 really small print. Thanks.

19 MR. STODDARD: Okay. We will -- we  
20 will do that.

21 Q Do you see there, Ms. Felts --  
22 sorry. We -- we need to scroll down to  
23 page 25. (Inaudible) or scroll up. Sorry.

24 This is -- see where it says, "SED  
25 finds that SoCalGas violated Section 451 by  
26 operating well SS-25 without a backup  
27 mechanical barrier to the seven-inch  
28 production casing"?

1 A Yes.

2 Q And backup mechanical barrier  
3 refers to -- again -- again, wells have a  
4 surface casing, a production casing and an  
5 internal tubing, which is another layer of  
6 metal. Correct?

7 MR. GRUEN: I'm going to object to that  
8 question, your Honor, as overly broad  
9 describing all wells that way.

10 MR. STODDARD: Well --

11 ALJ POIRIER: Mr. Stoddard, can you  
12 restate?

13 MR. STODDARD: Yeah.

14 Q Well SS-25, let's take that one,  
15 includes a surface casing -- or included a  
16 surface casing, a production casing and  
17 tubing within the -- within the production  
18 casing. Correct?

19 A Yes.

20 Q And generally, that's also how  
21 wells at Aliso Canyon were configured.  
22 Correct?

23 A There's -- yes. They're all  
24 constructed like that.

25 Q Right. And if -- if we start -- if  
26 we use the phrase tubing in packer  
27 configuration, is that -- would you agree  
28 that that's the configuration that we are

1 describing?

2 A That's the internal casing and  
3 tubing configuration?

4 Q Yes.

5 A Yes.

6 Q Okay. And the term backup  
7 mechanical barrier would refer to whether you  
8 are flowing the gas through the tubing, but  
9 not through the casing. Is that correct?

10 A For -- a backup mechanical barrier  
11 is just an additional layer of casing that's  
12 not under the same pressure, a high pressure  
13 that the well that you're using to -- the  
14 casing or tubing you're using to produce or  
15 inject gas is -- is subject to. So the  
16 second barrier is there in case there's a  
17 leak in the first barrier that's under  
18 pressure.

19 Q Just to clarify, does the backup  
20 mechanical barrier include a surface casing?

21 A No, it would not.

22 Q Thank you. And Ms. Felts,  
23 backup -- the use of backup mechanical  
24 barrier was not required by regulation prior  
25 to the incident. Correct?

26 A Not required by DOGGR in  
27 California. They seemed to approve the use  
28 of the casing for transport of injected and

1 withdraw of gas.

2 Q Was it -- you said it -- you  
3 clarified not -- was it by DOGGR or was it --  
4 was it -- was the use of dual mechanical  
5 barrier required by any other state or  
6 federal authority in California?

7 A Not in California. I think it was  
8 required in other states.

9 Q Which other states?

10 A I don't know. I've just -- think  
11 that I saw that. It may have actually been  
12 in Hower and Stinson's testimony.

13 MR. STODDARD: If we could please refer  
14 to sur-reply exhibit, her -- Ms. Felts'  
15 sur-reply testimony, Exhibit 51, and turn to  
16 page 28 of the PDF. I will read the Bates  
17 number when we get there. This is stamped --  
18 sorry. This is marked SoCalGas-51, and page  
19 .2.0028. I'll repeat that, since I messed it  
20 up a bit.

21 SoCalGas-51.0028. And if we could  
22 please scroll up. Stop there.

23 Q Ms. Felts, here it says: SoCalGas  
24 operated wells without dual barriers, knowing  
25 that this was an unsafe practice for Aliso  
26 gas storage wells.

27 Do you see that?

28 A Yes.

1           Q    Can you please point me to where in  
2 your testimony there's evidence that SoCalGas  
3 knew it was an unfit practice?

4           A    I don't think there's anything in  
5 my testimony. Is that what you're saying  
6 in --

7           Q    Yes.

8           A    It's just stated right there. You  
9 just read it.

10          Q    Okay. So the statement is there,  
11 but there's no support evidence. Is that  
12 correct?

13          A    Well, the unsafe practice relates  
14 to "S" -- the violation of 451, and then the  
15 evidence or the -- and discussion is below  
16 that heading.

17          Q    Is there anything in there,  
18 Ms. Felts, that you can point to that goes to  
19 SoCalGas's knowledge that operating wells  
20 without dual barrier was an unsafe practice?

21          A    I don't think it's in here,  
22 although I haven't -- haven't looked at the  
23 next page, so I'm not sure --

24          Q    Please -- please do.

25          A    -- what else is stated there.

26          Q    Ms. Felts, do you want us to go off  
27 the record for a moment?

28          A    Yes, that would be a good idea.

1 ALJ POIRIER: Let's go off the record.

2 (Off the record.)

3 ALJ POIRIER: Back on the record.

4 MR. STODDARD: Thank you, your Honor.

5 Q Ms. Felts, we took a break for a  
6 moment for you to review the certified  
7 testimony related to the dual mechanical  
8 barrier-related violations, and I believe I'd  
9 asked you what evidence there was in your  
10 testimony that SoCalGas knew that dual  
11 mechanical barrier was an unsafe practice.

12 A Okay.

13 Q I'm sorry, knew that -- sorry. I  
14 apologize. Let me restate that, because I --  
15 I -- I said something that was incorrect  
16 there.

17 It was -- the question was: What  
18 is the basis for your contention and  
19 testimony that SoCalGas knew that dual flow  
20 was an unsafe practice?

21 A Okay. And that wouldn't be in this  
22 section, if it were here at all, because this  
23 section refutes Hower and Stinson's claim  
24 about some sort of industry standard having  
25 to do with dual barriers. So this is a  
26 reply.

27 Q This is testimony. Correct?

28 A Yes. But, I mean it's testimony in

1 reply that -- a claim that Hower and Stinson  
2 made in their testimony.

3 Q And you would agree that the  
4 statement that SoCalGas knew that dual flow  
5 was an unsafe practice is a factual  
6 statement, wouldn't you?

7 A That's the heading on the section.

8 Q Should that heading be corrected?

9 A I don't see any reason to correct  
10 it. It reflects the violation, Violation 77.

11 Q Well, okay. Then, can you point  
12 me, please, to where the evidence is that  
13 SoCal -- in your testimony that SoCalGas  
14 op -- that SoCalGas's operation of wells  
15 without dual barriers, knowing that this was  
16 an unsafe practice, and specifically the part  
17 about SoCalGas knowing that the use of dual  
18 flow was an unsafe practice?

19 I believe you've indicated it's not  
20 in this section. Sitting here today, do you  
21 recall whether it's somewhere else in this  
22 testimony?

23 A It's -- it would not, as far as I  
24 recall, be in this reply testimony.

25 Q Ms. Felts, did you --

26 MR. GRUEN: Your Honor, this is Darryl  
27 Gruen. If I may, I'm going to note an  
28 objection. This is an immensely broad

1 question, and counsel's asking Ms. Felts to  
2 go through -- recount all of her testimony.  
3 If -- if counsel would like to give Ms. Felts  
4 a chance to review her opening testimony,  
5 she's referred several times to it, we can do  
6 that; but, I'd request a break at this point  
7 so we can go off the record to do that.

8 MR. STODDARD: Your Honor, I'd like the  
9 witness to answer the question. She  
10 presumably reviewed her testimony in  
11 preparation for this cross-examination. This  
12 is a -- an entire violation that she's  
13 alleging here, and the heading specifically  
14 asserts a fact which she's indicated isn't in  
15 this testimony. And counsel that -- he's  
16 asking that she be given an opportunity to go  
17 back and research to see if she can find it  
18 elsewhere.

19 MR. GRUEN: Your Honor --

20 (Crosstalk.)

21 MR. STODDARD: I'll let him handle that  
22 on redirect, if he would like.

23 MR. GRUEN: Your Honor, for clarity of  
24 the record, she would be entitled to review.  
25 She's referred Mr. Stoddard to other pieces  
26 of testimony, and it -- relating to the  
27 violation; yet, he's unwilling to pull it up  
28 for her. So she should have a chance to

1 review it. It's for --

2 ALJ POIRIER: I've heard --

3 MR. GRUEN: -- clarity of the record.

4 ALJ POIRIER: I've heard enough. What  
5 we're going to do -- I'm going to allow the  
6 question. But, we're going to take a break  
7 now, an afternoon break, ten minutes,  
8 12 minutes, to 2:10, and Ms. Felts should be  
9 prepared to answer the question at that  
10 point. Thank you.

11 We'll be off the record.

12 (Off the record.)

13 ALJ POIRIER: We will be back on the  
14 record.

15 We just are returning from an  
16 afternoon break, and also an opportunity for  
17 Ms. Felts to review her testimony.

18 Now that we're back, Ms. Felts,  
19 please, can you go ahead and proceed with  
20 your answer? Ms. Felts, you're on mute.

21 THE WITNESS: Sorry. Can you repeat  
22 the question, please?

23 BY MR. STODDARD:

24 Q Oh. Ms. Felts, I believe the  
25 question was asking you to identify where in  
26 your testimony there's evidence that SoCalGas  
27 had knowledge that dual flow was an unsafe  
28 practice.

1           A     Okay. Looking over my testimony  
2 and reading -- reviewing this section, I find  
3 that we should just modify the heading,  
4 because it includes words that aren't  
5 supported in this section.

6                     And so, I would propose that we  
7 replace "knowing that this was" with a comma;  
8 so deleting "knowing that this was," and then  
9 adding a comma.

10                    And then it would read: SoCalGas  
11 operated wells without dual barriers, an  
12 unsafe practice for Aliso gas storage wells.

13           Q     I'm -- I'm not sure I follow.

14                    ALJ POIRIER: Can we put up the  
15 exhibit, please? I think that would be  
16 helpful.

17                    MR. STODDARD: If we could please put  
18 up Exhibit Number 51.

19           Q     Ms. Felts, you're -- you're --  
20 you're suggesting adding a comma?

21           A     On the second line, delete "knowing  
22 that this was," delete those four words, and  
23 then --

24           Q     Okay.

25           A     -- add a comma after "barriers."

26                    MR. STODDARD: We -- if we can go off  
27 the record for a second, I just need to make  
28 a revision in my testimony.

1 ALJ POIRIER: Off the record.

2 (Off the record.) ]

3 ALJ POIRIER: Okay. Back on the  
4 record.

5 Please continue, Mr. Stoddard.

6 MR. STODDARD: Thank you, your Honor.

7 Q If we can turn to Exhibit 51, pages  
8 26 to 27, of Mrs. Felts' Sur-Reply Testimony,  
9 Chapter One, and this is Bates number page  
10 SoCalGas-51.0028. And do you see where it  
11 says:

12 Hower & Stinson title their  
13 Section 4 -- sorry, Section  
14 6, "Dual Mechanical  
15 Barriers are not Industry  
16 Standard and Single-Barrier  
17 Well Completions are  
18 Industry Standard." Of  
19 course this title has no  
20 bearing on Violation 77  
21 which is a 451 safety  
22 violation.

23 Do you see that, Ms. Felts?

24 A Yes.

25 Q So in your view, industry standards  
26 and prevailing practices are irrelevant to  
27 consideration of whether SoCalGas --  
28 SoCalGas' conduct violates Section 451?

1           A    Are you asking me if industry  
2 standards are irrelevant? Is that the  
3 question?

4           Q    Yes. I'm asking whether in your  
5 view compliance with industry standards and  
6 prevailing practices are irrelevant to  
7 assessing violations of 451.

8           MR. GRUEN: I am going to note  
9 objection calling for legal conclusion in a  
10 very broad way. It's an overly-broad  
11 question. This is running down the lines of  
12 what SoCalGas agreed not to do in the  
13 prehearing conference.

14          MR. STODDARD: Your Honor, Ms. Felts'  
15 testimony, the highlighted piece here, of  
16 course this title has no bearing on Violation  
17 77 which is a 451 safety violation in  
18 Ms. Felts' testimony and I am trying to  
19 understand the basis for that.

20          ALJ POIRIER: The question relates to  
21 testimony of Ms. Felts. I am going to allow  
22 the question but with the reminder that let's  
23 let the document speak for themselves, but  
24 this is a relevant question. Please move  
25 ahead.

26          THE WITNESS: Okay. So the discussion  
27 here of industry standards, of which there  
28 are none, has no bearing on the violation,

1 which is a 451 safety violation. And just to  
2 reiterate, the public utility is supposed to  
3 furnish and maintain equipment in facilities  
4 necessary to promote the safety of its  
5 patrons, employees and the public. It  
6 doesn't say anything about complying with  
7 industry standards, whether they exist or  
8 don't. I think the utility has a  
9 responsibility to operate their equipment  
10 safely.

11 BY MR. STODDARD:

12 Q Ms. Felts, would it be fair to say  
13 that then again that the reasonableness of  
14 SoCalGas' conduct with respect to operation  
15 of wells in a dual-flow configuration has no  
16 bearing on whether or not it's a violation of  
17 451?

18 MR. GRUEN: Now we're going to a  
19 question that's been asked and answered on  
20 the first day of hearings, your Honor.

21 ALJ POIRIER: Sustained.

22 MR. GRUEN: There was robust  
23 cross-examination.

24 MR. STODDARD: I didn't mean to speak  
25 over you, your Honor.

26 ALJ POIRIER: Objection is sustained.  
27 Let's move on.

28 (Crosstalk.)

1 BY MR. STODDARD:

2 Q Ms. Felts, if I may ask a few other  
3 questions that just assess whether you  
4 believe they are relevant in terms of your  
5 assessment of 451 and I will move on from  
6 industry standards and prevailing practices.

7 What about operational  
8 considerations? Are operational  
9 considerations, such as delivered -- impact  
10 on deliverability and energy reliability  
11 relevant to an assessment of 451?

12 A I think those are two different  
13 things. It would be relevant if the issues  
14 related to deliverability involved safety of  
15 some sort; safety of its patrons, employees  
16 and the public. So I can't really answer  
17 that without set up that.

18 Q Okay. Thank you. We can establish  
19 some foundation here.

20 So, Ms. Felts, again, to briefly  
21 describe what dual barrier entails, it would  
22 mean in the instance -- in the case of wells  
23 like SS-25, Aliso Canyon, flowing gas solely  
24 through the tubing and not the casing annulus  
25 as well, correct?

26 A Yes.

27 Q And the tubing is a smaller pipe  
28 than the casing, correct?

1           A    Yes.

2           Q    And so if you do tubing flow only,  
3 it reduces the deliverability of the gas  
4 coming out of the well, correct?

5           A    If you use the same tubing, I think  
6 it's possible you could install slightly  
7 larger-type tubing to alleviate some of that  
8 impact.

9           Q    But nonetheless, if it's smaller  
10 than the casing, it will reduce the capacity  
11 of deliverability of the gas, correct?

12          A    Somewhat, yes.

13          Q    Okay.  And if you do that across  
14 the field, that means that the field will put  
15 out less gas at any given moment, correct?

16          A    Excuse me.  Since the entire field  
17 has gone to that configuration, I am assuming  
18 DOGGR contemplated that in making that  
19 requirement.  And, I mean, the quick answer  
20 to your question is:  Yes, it will reduce the  
21 amount that you can produce or extract from,  
22 if you're using the casing -- I mean, if  
23 you're using the tubing only.

24          Q    Okay.  Thank you.  If we could  
25 please turn to Exhibit Number 143 and we can  
26 take a break while we quickly bring this up,  
27 since it's relevant to a statement that  
28 Ms. Felts just made.  So we may need a second

1 to locate it.

2 ALJ POIRIER: Let's go off the record.

3 (Off the record.)

4 ALJ POIRIER: Back on the record.

5 Please continue, Mr. Stoddard.

6 MR. STODDARD: Thank you.

7 Q Ms. Felts, do you see this  
8 document? This is a letter to Executive  
9 Director Timothy Sullivan, dated March 30,  
10 2017, from SoCalGas Senior Vice President  
11 Rodger Schwecke. Do you see that?

12 A Yes.

13 Q This is SoCalGas Exhibit  
14 Number 143, if we can go down to Bates number  
15 SoCalGas-143.0001. If we can go up to the  
16 first paragraph, please, this letter states:

17 This letter responds to  
18 your March 16, 2017 letter  
19 regarding SoCalGas' plans  
20 to implement additional  
21 safety enhancements and  
22 integrity assessments at  
23 La Goleta, Playa del Rey  
24 and Honor Rancho storage  
25 fields. In your March 16th  
26 letter, you direct SoCalGas  
27 to revise its storage safe  
28 enhancement plan to

1 maintain a system-wide  
2 withdrawal capacity level  
3 of 2.065 Bcf per day  
4 beginning June 1, 2017 and  
5 throughout the balance of  
6 the safety enhancement  
7 project. Further, you  
8 direct that the amount  
9 should increase as quickly  
10 as possible to 2.420 Bcf  
11 per day using improvements  
12 to withdrawal capacity at  
13 each of the fields,  
14 including the management of  
15 inventory levels and  
16 increases to wells in  
17 service at all fields.  
18 It is SoCalGas'  
19 understanding that this  
20 directive to maintain  
21 elevated levels of  
22 withdrawal capacity through  
23 the summer season is  
24 intended to address  
25 reliability concerns for  
26 electric-generating  
27 facilities operating in the  
28 Los Angeles Basin and

1           prepare for the coming  
2           winter season.

3           Do you see that, Ms. Felts?

4           A    Yeah.  I'm not familiar with this  
5           letter, though.

6           Q    You haven't seen this letter?

7           A    No.  It wasn't produced to us, I  
8           don't think.

9           Q    Have you accessed the Commission --  
10          the California Public Utilities Commission's  
11          Aliso Canyon Incident webpage?

12          A    Not recently.

13          Q    If we could turn to page 2 of that  
14          document.  I will keep it brief.

15          MR. GRUEN:  Your Honor, I will object.  
16          Lack of foundation.  The witness has said she  
17          doesn't recognize the document.

18          ALJ POIRIER:  Mr. Stoddard.

19          MR. STODDARD:  I'm going to ask her a  
20          question related to reliability and tubing  
21          flow here in a minute.

22          ALJ POIRIER:  Okay.  I will allow it.

23                 What I do want is clarification on  
24          the top part of the letter.  There's some, I  
25          think there was La Goleta.  There was a list  
26          of -- I want to clarify.  Are those included  
27          in the Aliso Canyon?  I just want a  
28          clarification.

1 MR. STODDARD: They are other storage  
2 fields that Southern California Gas Company  
3 operates that were aware that withdrawal  
4 issues for purposes of reliability were  
5 impacted by the reduction and use of Aliso  
6 Canyon at the time.

7 ALJ POIRIER: Okay. Please proceed,  
8 Mr. Stoddard.

9 MR. STODDARD: Thank you, your Honor.

10 Q If you could turn to the second  
11 full paragraph on page 2, the one that starts  
12 "with this mandated modification." It's  
13 Bates number SoCalGas-143.0002. Down there  
14 where it says, "with this mandated  
15 modification." And the second sentence  
16 there, it says:

17 For the withdrawal capacity  
18 to be at the directed level  
19 on June 1, 2017, it will  
20 require inventory  
21 management at both La  
22 Goleta and Honor Rancho to  
23 increase inventory levels  
24 and returning inspected  
25 wells to service with a  
26 tubing flow only  
27 configuration as now  
28 determined in the revised

1                   plan. Without the  
2                   anticipated inventory  
3                   management and wells coming  
4                   into service as planned,  
5                   SoCalGas may be required to  
6                   operate additional wells in  
7                   a casing flow  
8                   configuration, further  
9                   delaying the integrity  
10                  assessment of existing  
11                  wells.

12                  Do you see that?

13                  A    Yes.

14                  Q    One more sentence on page three  
15                  referring to building inventory at these  
16                  other fields for purposes of energy  
17                  reliability, the sentence after the bolded  
18                  one:

19                        If we are unable to build  
20                        the inventory levels at  
21                        Honor Rancho and La Goleta  
22                        to maintain the required  
23                        system-wide delivery  
24                        capacity, we may be  
25                        required to selectively  
26                        open sleeves on wells and  
27                        place them on casing flow  
28                        to increase withdrawal

1 capacity until the  
2 inventory levels can be  
3 built up. Likewise, we  
4 would reevaluate planned  
5 workovers to convert wells  
6 to tubing flow only flow --  
7 tubing-only flow at Honor  
8 Rancho, if inventory  
9 build-up does not take  
10 place as needed.

11 Do you see that?

12 A Yes.

13 Q And, Ms. Felts, the concern here is  
14 it's being reported to the California Public  
15 Utilities Commission, not DOGGER, correct?

16 A Yes.

17 Q And SoCalGas is describing,  
18 wouldn't you agree, the need to maintain  
19 certain wells in a casing flow configuration  
20 in order to support energy reliability; would  
21 you agree?

22 A I think that's a very shorthand  
23 statement. It doesn't really cover  
24 everything that was going on. And also this  
25 doesn't say that they are going to maintain  
26 operation using casing, but that they would  
27 open sleeves if they had to increase their  
28 casing flow to increase withdrawal capacity.

1 So I am assuming they would not -- they  
2 weren't anticipating using casing flow  
3 consistently into the future, but only as a  
4 temporary condition based on demand.

5 Q Okay. If we could please turn to  
6 Exhibit Number 61. This is going to be a  
7 letter to Rodger Schwecke from Executive  
8 Director Sullivan of the California Public  
9 Utilities Commission and it preceded the  
10 prior letter, but I want to read one sentence  
11 from this letter to inform the discussion  
12 with Ms. Felts.

13 In the first full paragraph, the  
14 first paragraph, this is Bates stamped  
15 SoCalGas-61.0001, Ms. Felts do you see there,  
16 second sentence:

17 After review of this plan  
18 and consultation with the  
19 California Energy  
20 Commission, the California  
21 Independent System Operator  
22 and the Los Angeles  
23 Department of Water and  
24 Power, the Commission has  
25 determined that the plan,  
26 as presented, will limit  
27 the withdrawal capacity of  
28 SoCalGas gas storage

1 facilities to a level that  
2 is demonstrably  
3 insufficient to meet the  
4 expected energy needs of  
5 SoCalGas customers this  
6 summer and fails to  
7 minimize energy reliability  
8 risks and, in turn, the  
9 safety-related risks  
10 associated with the  
11 curtailment of electricity  
12 supply.

13 Do you see that, Ms. Felts?

14 A I see it.

15 Q And the safety concern, just to  
16 point out here, the safety concern here is  
17 electric reliability, correct?

18 MR. GRUEN: Your Honor, that's  
19 mischaracterizing the letter. We are now  
20 interchanging "reliability" with "safety."

21 MR. STODDARD: Okay. I can restate it,  
22 if that will help.

23 ALJ POIRIER: Can you restate, please?

24 BY MR. STODDARD:

25 Q Yeah, Ms. Felts, the last sentence  
26 again says that:

27 SoCalGas' plan for gas  
28 withdrawals is insufficient

1 to meet the expected energy  
2 needs of SoCalGas'  
3 customers this summer and  
4 failed to minimize energy  
5 reliability risks and, in  
6 turn, the safety-related  
7 risks associated with  
8 curtailment of electricity  
9 supply.

10 Do you see that?

11 A I see it.

12 Q Do you know what "curtailment of  
13 electricity supply" means?

14 A I understand the statement.

15 Q Okay. What do you understand the  
16 statement to be saying?

17 A I understand that there was a move  
18 afoot and still is to close Aliso Canyon  
19 after SS-25 failure and that this is a  
20 statement by SoCalGas to turn over every  
21 stone to encourage that that doesn't happen.

22 So I kind of see this as more of a  
23 lobbying statement than anything else. And I  
24 have not read the latest report that came out  
25 about -- from the people who modeled the  
26 SoCalGas Aliso Canyon, which would include  
27 supply and demand, I assume. So I can't  
28 really state to what the recommendation

1 ultimately is, but I mean if I were SoCalGas  
2 and I would see in that situation with Aliso  
3 Canyon, I would probably write something  
4 similar to this.

5 Q But you view this as a lobbying  
6 statement from SoCalGas. This is a letter  
7 from the Public Utilities Commission,  
8 Ms. Felts.

9 A Oh. I thought you were just  
10 showing me something from SoCalGas.

11 Q That was the prior letter. This is  
12 a letter from the Commission Executive  
13 Director to SoCalGas.

14 MR. GRUEN: Your Honor, I am going to  
15 object to lack of foundation here. It  
16 clearly doesn't re -- the witness has stated  
17 one time she didn't recognize the letter and  
18 SoCalGas has gone from reading one more  
19 statement to a robust level of  
20 cross-examination on documents the witness  
21 has already stated she doesn't recognize.

22 MR. STODDARD: I can move on, your  
23 Honor.

24 ALJ POIRIER: Yes. Please move on.

25 BY MR. STODDARD:

26 Q If you can turn back to Ms. Felts'  
27 corrected Sur-Reply -- Exhibit 47, page 20,  
28 Footnote 103. Please move up a little bit.

1 Actually, sorry. Go up to -- further up on  
2 page 20. This again is SoCalGas Exhibit 47  
3 and the Bates number is SoCalGas-47.0024.  
4 Please scroll up to where it says, "If it  
5 turns out that SoCalGas," which I believe is  
6 in, if you scroll down, the footnote again,  
7 Footnote 103.

8           The last sentence in the footnote  
9 says -- and this relates to subsurface safety  
10 valves, this section, Ms. Felts which -- and  
11 the subsurface safety valve issue was in the  
12 discussion of dual flow in your opening  
13 testimony. Can you explain what the  
14 relationship between the subsurface safety  
15 valves are and the dual barrier issue?

16           A Can you show me where that is?

17           Q Sure. And it would help if we also  
18 zoomed out since we are zoomed in right now.  
19 If we can scroll up all the way to -- above  
20 here you will see the beginning of the  
21 discussion on page 19, 18. Can you give us a  
22 second while we locate the beginning of the  
23 SSSV discussion?

24           ALJ POIRIER: Let's go off the record.  
25 Let me know when you're ready.

26                   (Off the record.)

27           ALJ POIRIER: Back on the record.

28           THE WITNESS: Okay.

1 BY MR. STODDARD:

2 Q Ms. Felts, do you see here where it  
3 says, "with regards to whether subsurface  
4 safety valves could work on both tubing and  
5 casing at Aliso Canyon?"

6 A Yes. I see that.

7 Q And this again is in the section  
8 with the header, if we turn to page 18,  
9 related to dual mechanical barrier system in  
10 the wellbore of SS-25?

11 A Yes.

12 Q Can you briefly explain the  
13 relationship between the SSSV issue and the  
14 dual mechanical barrier issue?

15 A I think the issue is whether or not  
16 they could install a subsurface safety valve,  
17 an SSSV in a dual barrier -- I mean in a  
18 single barrier, sorry, dual-flow casing or  
19 well.

20 Q Okay. And if we can turn back to  
21 Footnote 103, the last sentence here says --  
22 correction. Actually, if we can read the  
23 sentence starting "in particular." Here it  
24 says:

25 In particular, SED may  
26 propound further discovery  
27 to inform whether SoCalGas  
28 could have successfully

1           used subsurface safety  
2           valves on both the tubing  
3           and the casing on wells in  
4           the Aliso Canyon natural  
5           gas storage facility prior  
6           to October 23, 2015. If it  
7           turns out that SoCalGas  
8           could have done so, SED  
9           reserves the right to  
10          assert additional  
11          violations of California  
12          Public Utilities Code  
13          Section 451 related to this  
14          matter.

15           Do you see that?

16           A    Yes.

17           Q    Ms. Felts, given that no additional  
18          violations on SSSVs have been alleged, is it  
19          safe to assume that SED has not concluded  
20          that subsurface safety valves could have been  
21          used to avoid the incident?

22           A    I think I have only seen where they  
23          have installed subsurface safety valves on  
24          tubing and I am not aware of any additional  
25          information that we have had since the  
26          publication of this testimony that would  
27          state that they could use a subsurface safety  
28          valve in both tubing and casing, but I

1 haven't done any additional research on that  
2 subject.

3 Q Okay. Thank you. If we could  
4 please turn to pages 39-45. I will read the  
5 Bates number here. SoCalGas-47.0043. And  
6 above it says:

7 By allowing groundwater to  
8 cause corrosion on the 7  
9 inch and 11-3/4 inch casing  
10 on SS-25, SoCalGas -- I'm  
11 sorry.

12 You're not in the right place. I  
13 apologize. Strike that. Please turn to  
14 page 44.

15 ALJ POIRIER: Let's go off the record.  
16 Please let me know when you're ready to  
17 proceed.

18 (Off the record.)

19 ALJ POIRIER: Back on the record.

20 BY MR. STODDARD:

21 Q This is page SoCalGas-47.0048. And  
22 you see there, Ms. Felts, where it says:

23 By allowing groundwater to  
24 cause corrosion on the 7"  
25 and 11-3/4 inch casings on  
26 SS-25, SoCalGas violated  
27 Section 451.

28 Do you see that, Ms. Felts?

1           A    Yes.

2           Q    Ms. Felts, in your experience,  
3 generally is water -- is exposure to  
4 groundwater necessary to cause corrosion on  
5 steel casings installed in the ground?

6           A    Well, exposure to groundwater is  
7 not necessarily required, but certainly if  
8 there is exposure to groundwater, it causes  
9 latency corrosion.

10          Q    In fact, steel casings in the  
11 ground, you know, typically and necessarily  
12 corrode when they're in that environment,  
13 don't they?

14          A    When they're in what environment?

15          Q    When they're buried in the ground.

16          A    Well, unless some efforts have been  
17 made to seal them against the rock or soil or  
18 sand that's against -- that would otherwise  
19 be in direct juxtaposition to the plate,  
20 that's why you would cement the piping used  
21 to provide a certain level of protection.

22          Q    Are there any other measures that  
23 you're aware of other than cementing the pipe  
24 and the casing?

25          A    I am sure that there's things that  
26 they have tried, probably inject a gel behind  
27 the casing that might provide some sort of  
28 protection. I'm not sure what else they

1 would do.

2 Q Okay. And, Ms. Felts, this  
3 statement is in connection with your alleged  
4 violations regarding failure to assess the  
5 relationship between groundwater and well  
6 casings; isn't that correct?

7 A Yes.

8 Q What would you suggest SoCalGas  
9 have done with regard to assessment of  
10 groundwater in connection -- in relation to  
11 the well casings?

12 A Well, in the case of this shallow  
13 corrosion, on this SS-25, I think they could  
14 have monitored groundwater that would  
15 basically be drain water coming down through  
16 the -- through an exposed formation, so, or  
17 groundwater that is moving from somewhere  
18 else. So I think there should have been some  
19 knowledge SoCalGas has done some geological  
20 studies and has a pretty good idea of the  
21 cross-sections for the Aliso Canyon. And  
22 they should know where the sources of water  
23 are. So given that, I think it would have  
24 been pretty obvious that there is a potential  
25 for water to impact the well casing and the  
26 surface casing. To that --

27 Q Do you know how -- sorry to  
28 interrupt. ]

1           A    To that end, they did attempt to  
2    cement the surface casing when the well was  
3    originally drilled by Getty, I think, and  
4    they left mud behind the casing which would  
5    provide some level of protection, but then  
6    when you had the well in the ground for  
7    60 years, there's always the potential that  
8    neither the cement or the mud would still be  
9    there.

10           Q    Do you know how Blade assessed the  
11    groundwater relationship in the course of  
12    their investigation?

13           A    I don't specifically, but I know  
14    that Blade asked SoCalGas to drill a water  
15    well or maybe they did it. I'm not sure what  
16    the contract arrangement was but a water well  
17    was drilled.

18           Q    That's correct. Are you suggesting  
19    that a water well in order to assess the  
20    relationship between groundwater and the  
21    casing, as Blade did here, that a water well  
22    would need to be drilled for each well at  
23    Aliso Canyon?

24           A    Absolutely not. That's not  
25    required. But I think that some monitoring  
26    of groundwater would have been very  
27    informative for SoCalGas for all of their  
28    wells.

1 Q Okay. I'll move on to the next  
2 topic.

3 ALJ POIRIER: Mr. Stoddard, would this  
4 be a good time for a short break?

5 MR. STODDARD: Sure.

6 ALJ POIRIER: And just for planning for  
7 the rest of the afternoon -- actually let's  
8 go off the record.

9 (Recess taken.)

10 ALJ POIRIER: Let's be back on the  
11 record. We just took our afternoon break.  
12 SoCalGas indicated they have approximately  
13 two hours of cross and that may be adjusted.  
14 I asked SoCalGas to compile a list of  
15 exhibits that they used today for that to be  
16 read on the record at the end of the day and  
17 we will move forward.

18 Go ahead, Mr. Stoddard.

19 MR. STODDARD: Thank you, your Honor.  
20 And just to clarify, I think we have a little  
21 bit more than two hours, but we will endeavor  
22 to get it down to two by cutting some tonight  
23 after we break today.

24 ALJ POIRIER: Understood.

25 MR. STODDARD: Mr. Moshfegh, if we  
26 could please turn to Exhibit SoCalGas-124.  
27 It's an e-mail from Darryl Gruen to Margaret  
28 Felts dated Friday, April 24, 2020. If you

1 can put that up, then I'll describe the  
2 document.

3 ALJ POIRIER: Let's go off the record  
4 until the document is ready to go.

5 (Off the record.)

6 ALJ POIRIER: Back on the record.

7 MR. STODDARD: Referring to the Bates  
8 number in the lower right hand corner of this  
9 document. This document is Bates stamped  
10 SoCalGas-124.0001.

11 Q Ms. Felts, you'll see that this was  
12 used as an exhibit in your deposition of  
13 February 25, 2021.

14 Do you see that?

15 A Yes.

16 Q Can you please scroll up.

17 This is an e-mail from Mr. Gruen to  
18 Margaret. At the top line it says "Thanks,"  
19 and below that an e-mail from Ms. Felts to  
20 Mr. Gruen with her e-mail address redacted.  
21 It's dated Friday, April 24, 2020, 10:10 a.m.  
22 The subject line says "Gas Safety Plans."

23 Do you see that?

24 A Yes.

25 Q The content of the e-mail reads:  
26 Darryl, see attached. Both  
27 found with a simple search  
28 on the CPUC website. For

1 CPUC Gas Safety Plan, see  
2 pages 22 and 28. For 2013  
3 SoCalGas Gas Safety Plan,  
4 see e-pages 102, 116, 124,  
5 and can also search on  
6 storage, but some storage  
7 refers to underground  
8 storage tanks and possibly  
9 storage in pipelines.

10 Do you see that?

11 A Yes.

12 Q Do you recognize this document?

13 A Yes.

14 Q Do you recall writing this e-mail?

15 A Yes.

16 Q If we could please turn to  
17 Exhibit 125. This was an attachment to the  
18 e-mail, we believe, although SED does not  
19 Bates stamp their -- sorry.

20 ALJ POIRIER: The document is not up  
21 yet. Let's wait until we get the document  
22 up.

23 Mr. Stoddard, if you can scroll down  
24 just a little bit, it would be helpful.

25 MR. STODDARD: Sorry.

26 Q You'll see this is marked  
27 SoCalGas-125.0001 and this is the CPUC Gas  
28 Safety Plan is what it says here in the

1 title. This was in the production of  
2 documents from SED along with that e-mail  
3 from Ms. Felts, but it wasn't Bates stamped  
4 and so we're not able to necessarily confirm  
5 association, but, Ms. Felts, do you recognize  
6 this document?

7 MR. GRUEN: Your Honor, I'd object just  
8 to same that it hasn't been Bates stamped.  
9 This was provided as a data response. I'll  
10 withdraw the objection just to see where he  
11 goes generally.

12 ALJ POIRIER: Let's go with if  
13 Ms. Felts is familiar with the document  
14 first, and then let's go from there.

15 THE WITNESS: I am familiar with the  
16 document. I think this, the gas safety plan  
17 e-mails, were mistakenly included in a  
18 production to SoCalGas discovery.

19 BY MR. STODDARD:

20 Q Why mistakenly?

21 A Well, I think the way the e-mails  
22 were found was through some sort of a search  
23 of e-mails or in part through a search of  
24 e-mails at the Public Utilities Commission.  
25 I'm not sure how that happens, but this was  
26 an e-mail between me and Darryl, and I  
27 researched this after the deposition to see  
28 why this was in the mix.

1           My best -- well, let me say that  
2 what I found is that apparently a report from  
3 PG&E regarding San Bruno's annual filing had  
4 come out and I had asked Darryl if he could  
5 send me that information, the report, or a  
6 link to it. And so one thing led to the  
7 other and I ended up looking at PG&E's Gas  
8 Safety Plan. So, I don't think this really  
9 had anything to do with the SoCalGas  
10 proceeding. I think I was thinking on a  
11 different level about a different proceeding.

12           Q    So what's your understanding of the  
13 page references in your e-mail, pages 22 and  
14 28? We can turn to them if it would help,  
15 but do you recall what the purpose of it is  
16 based on the description in your e-mail?

17           A    I was just looking at -- I looked  
18 at the index and found the pages that  
19 referred to storage out of just curiosity.  
20 What in the world would be storage in a gas  
21 safety plan that's about pipelines?

22           Q    So, were you working on another  
23 case related to PG&E's Gas Safety Plan?

24           A    Well, at the conclusion of San  
25 Bruno, there were a number of requirements  
26 going forward that PG&E had to comply with.  
27 One of them was an annual report that  
28 included a lot of different items. Without

1 actually calling up a report, I couldn't tell  
2 you specifically what the content was, but it  
3 was when I received an e-mail related to San  
4 Bruno, which I think was just some kind of  
5 generic service list that I was on. That  
6 prompted this.

7 So that's the best I can figure out  
8 because really these gas safety plans are  
9 about pipelines and they don't really have  
10 anything to do with the failure at SS-25.

11 Q Okay. If we could please pull up  
12 data -- sorry, Exhibit 128.

13 You'll see here it says it says:  
14 Subject: Safety and  
15 Enforcement Division's  
16 Response to Southern  
17 California Gas Company's  
18 Ninth Set of Data Requests,  
19 Questions 10 through 12.

20 It's dated May 15, 2020, which is a  
21 couple weeks after the e-mail we were just  
22 looking at?

23 A Yes.

24 Q Do you see that? All right. And  
25 then, "Question 10. Produce all documents  
26 related to SED's review of SoCalGas' 2012 Gas  
27 Safety Plan."

28 Do you see that?

1           A    Yes.

2           Q    And so SED objects here and stating  
3 that SED's -- we can read the response:

4                    SED also objects that the  
5                    data request seeks to  
6                    elicit information that is  
7                    not permitted under  
8                    Commission Rules of  
9                    Practice and Procedure  
10                   Rule 10.1.  Namely, the  
11                   question is neither  
12                   admissible in evidence and  
13                   does not appear  
14                   reasonably --  
15                   I'm sorry, I'm going too fast --  
16                   Does not appear reasonably  
17                   calculated to lead to the  
18                   discovery of admissible  
19                   evidence.  Namely, SED's  
20                   review of the 2012, 2013,  
21                   and 2014 Gas Safety Plan  
22                   does not relate to matters  
23                   below the wellhead (down  
24                   well) in Aliso Canyon.  
25                   Do you see that in the first  
26 paragraph, Ms. Felts?

27           A    Yes.  Somebody is highlighting the  
28 next paragraph --

1 Q Yeah, sorry --

2 ALJ POIRIER: Let's go off the record.

3 (Off the record.)

4 ALJ POIRIER: Okay. Back on the  
5 record.

6 Please continue, Mr. Stoddard, and  
7 remember to identify the Bates number.

8 MR. STODDARD: Thank you, your Honor.  
9 Are we back on the record?

10 ALJ POIRIER: Yes.

11 MR. STODDARD: This is document  
12 SoCalGas-128.0001. If we can scroll back up,  
13 please, to the first paragraph there, which I  
14 read into the record before we took a break  
15 to correct highlighting on the document.

16 Q Ms. Felts, did you assist with  
17 preparation of this response?

18 A I probably discussed it with  
19 counsel.

20 Q Do you recall those discussions  
21 with counsel?

22 A No.

23 Q Again, the date here is a couple  
24 weeks after that e-mail we were just looking  
25 at. Now that you're seeing the document, do  
26 you think that that e-mail had to do with  
27 potential work related to responding to this  
28 data request?

1           A    I think it's possible.  I don't  
2    know.

3           Q    Okay.  Earlier you indicated that  
4    you thought that had absolutely nothing to do  
5    with work related to Aliso Canyon.  I just  
6    want to confirm that you're confident in that  
7    statement given that you were preparing with  
8    SED a data response on this very issue that  
9    was objecting and not producing any documents  
10   at the same time.

11          A    Well, now that you're showing me  
12   these dates, I really don't know which was  
13   which, which came first.

14          Q    You don't know whether the data  
15   requests came first or the e-mail where you  
16   were describing the gas safety plans briefly?

17          A    Well, my looking into the gas  
18   safety plan.  So, I know I sent the e-mail  
19   and you showed me the dates, but I  
20   just don't -- I don't remember this chain of  
21   events at all other than what I've told you.

22          Q    Okay.  If we could turn to Exhibit  
23   Number 144?

24          ALJ POIRIER:  Let's go off the record.

25                   (Off the record.)

26          ALJ POIRIER:  Back on the record.

27                   Please continue, Mr. Stoddard.

28          MR. STODDARD:  Thank you, your Honor.

1 I'm going to read the Bates number. In the  
2 lower right-hand corner there it says  
3 SoCalGas-144.0001. Please scroll back up.

4 Q This is titled Natural Gas System  
5 Operator Safety Plan, SoCalGas. It includes  
6 a table of contents below with references to  
7 applicable statutory requirements.

8 Do you see that Ms. Felts?

9 A Yes.

10 Q Then scroll down to the bottom of  
11 this page. So you see there it says -- I  
12 don't know if you can see this. We might  
13 have to blow it up a little bit. But it says  
14 "2012-2013."

15 Do you see that?

16 A Yes.

17 Q Thank you.

18 If we could please turn to page  
19 102 -- actually 124 of this document, which  
20 is the last page that you referenced in your  
21 e-mail.

22 Do you see that, Ms. Felts?

23 A I see the page, yes.

24 Q Okay. This is a table and it says  
25 "Appendix, Safety Policy Documents, SoCalGas,  
26 Appendix A." And then if you scroll down, do  
27 you see where it says "Policy Number  
28 223.0375"?

1 A Yes.

2 Q "MAXIMO Transmission and Storage  
3 Operations"?

4 A Yes.

5 Q Do you know what that refers to?

6 A MAXIMO is a database that SoCalGas  
7 maintains.

8 Q And do you know what the numbers  
9 refer to?

10 A No.

11 Q Would it be correct to say that  
12 these are SoCalGas gas standards, Ms. Felts,  
13 these numbers?

14 A I would believe you. I don't know.

15 Q Okay. I'll see if you recognize  
16 another one. Down below where it says  
17 "224.0030, Well Operations-Well Kill."

18 A Uh-huh.

19 Q Do you recognize that, Ms. Felts?

20 A There is a standard that SoCalGas  
21 produced that has that title. I just don't  
22 know the numbers.

23 Q Do you recall recognizing the  
24 number format as a gas standard number  
25 format?

26 A Not really. If you want to show me  
27 a standard, I could verify that, but I  
28 believe you.

1           Q    Have you reviewed SoCalGas' gas  
2 safety standards?

3           A    I have. I just don't remember  
4 the -- I've reviewed a lot of standards for  
5 PG&E. And so, you know, if I tell you  
6 something about a number, it could be coming  
7 from PG&E's standards, so I had it committed  
8 to memory, the standard numbers for the  
9 standards that SoCalGas produced. They  
10 produced a lot of them and a lot of versions  
11 of them.

12           Q    Understood. I think -- what I'm  
13 asking isn't for you to recite from memory  
14 these numbers, it's more whether or not you  
15 recognize them, but I can move to the next  
16 question.

17                    Do you see there where it says  
18 "224.02, Operation of Underground Storage  
19 Wells"?

20           A    Yes.

21           Q    Okay. And then on the next page  
22 one more which you may recognize is 224.070,  
23 "Gas Inventory Monitoring Verification or  
24 Reporting."

25                    Do you see that, Ms. Felts?

26           A    Yes.

27           Q    And do you recall that standard?

28           A    No. I don't -- I mean I'm sure it

1 was probably among all the ones that were  
2 provided, but I didn't -- I don't remember  
3 looking at that one.

4 Q This is the standard, Ms. Felts,  
5 that describes SoCalGas' well integrity  
6 monitoring practices. This plan -- did  
7 you -- did you research on the gas safety  
8 plans after you received that data request or  
9 in the course of writing that e-mail whether  
10 the Commission approved these plans?

11 A No.

12 Q Did you ask SED or Darryl for any  
13 other information -- apologies -- Mr. Gruen  
14 for any other information regarding the  
15 Commission's review and approval of these  
16 safety plan documents?

17 A No, I don't remember having a  
18 discussion about these documents,  
19 specifically this one at all.

20 Q So you noted in your e-mail that it  
21 included standards related to gas storage  
22 operations, but you didn't inquire as to what  
23 the significance of that might be?

24 A There may have been a conversation.  
25 I just don't remember it.

26 Q Okay.

27 If we can switch back to  
28 Exhibit 51, please. If we can turn, please,

1 to Chapter 7 at page 7, reference to the  
2 13,000 pages. I can't see it very well  
3 because it's very small. Oh, there we go.  
4 Thank you. The Bates number here is  
5 SoCalGas-51.0120. You state:

6 Thus, in addition to being  
7 disorganized in containing  
8 a mix of records from three  
9 wells, SS-25, SS-25A, and  
10 SS-25B, the initial SS-25  
11 file I reviewed was also  
12 incomplete, estimated to be  
13 short by about  
14 13,490 pages, although that  
15 number probably includes  
16 many duplicates.

17 Do you see that, Ms. Felts?

18 A Yes.

19 Q And what was the basis for the  
20 calculation there that it was short by  
21 13,490 pages?

22 A I think it's in the footnote on  
23 that same page.

24 Q Is there a footnote on this  
25 sentence?

26 A Well, it may not be on that  
27 sentence, but it's in the -- I know it's on  
28 the page.

1 Q Okay.

2 (Crosstalk.)

3 THE WITNESS: It's probably Footnote 26  
4 maybe.

5 MR. STODDARD: Okay. I think this is  
6 another item that might need to be corrected,  
7 but I won't bring up the data response, but I  
8 believe you guys did change this number. I  
9 don't need to bring up the number right now  
10 unless you want me to.

11 MR. GRUEN: Sorry, is there a question  
12 for the witness?

13 MR. STODDARD: I'm just flagging as  
14 long as we're correcting testimony that I  
15 believe -- I guess I can do it with the data  
16 request if you'd prefer and the data  
17 response.

18 But we can turn to Footnote 26.

19 Q Is that the footnote you were  
20 referring to, Ms. Felts?

21 A Yes.

22 Q That has a lot of Bates numbers. I  
23 was asking for kind of the reasoning as to  
24 how you reached the conclusion that the well  
25 file was short by 14 -- 13-some,  
26 14-some-thousand pages?

27 A Well, the original well file was  
28 1,587, so in parens behind each of those well

1 files is the number of pages. I do admit  
2 that all of those 1,587 pages also included  
3 pages from SS-25A and B, so I probably  
4 undercounted here.

5 So then the next one you can see  
6 has 2,688 pages, and the next one, DR-27,  
7 224, and so on. So I added up all of the  
8 pages and subtracted what we received in the  
9 initial well file for SS-25. ]

10 Q Okay. So you added all the pages  
11 of -- of electronic production records that  
12 referenced SS-25, and subtracted the number  
13 of documents in the well file. Is that  
14 right?

15 A Not just referenced, but I believe  
16 these were the ones that were in response to  
17 requests for well file records for SS-25 or  
18 supplements provided to the -- another data  
19 request for SS-25 files.

20 Q Okay. And -- and Ms. Felts, in the  
21 course of -- of doing this calculation, were  
22 you referencing some kind of a -- a  
23 regulation or a rule or a requirement  
24 regarding what should be in a well file?

25 A No. I was -- I've always just gone  
26 by what SoCalGas has represented as being in  
27 their well file.

28 Q Can you please explain what that

1 means?

2           A    Well, I think, after a few maybe  
3 initial hiccups, we -- we received a  
4 definition of four well folders that are  
5 supposed to be in a well file, and related  
6 documents would be in those well folders,  
7 theoretically. They would be invoices for  
8 work on the well, well logs, well surveys,  
9 and one other that I can't just remember  
10 right now.

11           Q    And so you reviewed those  
12 13,000-some pages to confirm that each page  
13 fit into one of those categories?

14           A    I can't -- I'm sure that all of --  
15 that there are documents in these sets that  
16 don't necessarily fit into those categories,  
17 but then there are also documents in all of  
18 the well files that don't fit into those four  
19 categories. So there's not clear -- not a  
20 clear definition of what SoCalGas is putting  
21 in well files. For instance, interoffice  
22 correspondence and interoffice memos  
23 doesn't -- don't really fit into any of the  
24 folders, but they appear in various folders.

25           Q    Ms. Felts, the purpose of a well  
26 file is -- again, I mean it's a hard copy  
27 document. Correct? There's a hard copy  
28 version of a well file. Correct?

1           A    Yes.

2           Q    And the purpose of a well file is  
3 for the gas storage engineers and others to  
4 reference in the course of -- of well  
5 operations, working on the well, or any other  
6 need they have to consult the well file.  
7 Correct?

8           A    That is a purpose of the well file,  
9 to provide a history of what's happened with  
10 the well.

11          Q    And it actually fits -- it's a  
12 physical -- but, again, this is a physical  
13 file. Correct?

14          A    Yes.

15          Q    How useful would a doc- -- would a  
16 file be if it included 22,000-some pages of  
17 documents related to the entire -- you know,  
18 the entirety of the well's history?

19          A    Well, probably not real useful to a  
20 person that has to page through it all.

21          Q    Especially if they had to page  
22 through it all in the course of performing  
23 their job working on the well, wouldn't you  
24 agree?

25          A    You know, my point here is exactly  
26 that, that it couldn't possibly have that  
27 many pages, and yet, SoCalGas sent us that  
28 many pages.

1 Q Well, I don't think that's exactly  
2 what your testimony says, though.

3 A Well, let's go back and look at  
4 what my testimony --

5 ALJ POIRIER: Mr. Stoddard, can you  
6 restate the question? If you -- if you have  
7 a question about her testimony, can you refer  
8 back to that?

9 MR. STODDARD: Okay.

10 Q Is that what your testimony says,  
11 Ms. Felts?

12 A I'm looking.

13 MR. STODDARD: Okay. To refer back to  
14 it, can we -- can we please scroll up,  
15 Mr. Moshfegh?

16 ALJ POIRIER: Let's go off the record.  
17 (Off the record.)

18 ALJ POIRIER: Back on the record.

19 Please go ahead, Ms. Felts.

20 THE WITNESS: Okay. Could you ask me  
21 the question again?

22 BY MR. STODDARD:

23 Q Yeah. I believe what you said  
24 was -- I think what I understood you to say,  
25 and you can correct me if you're wrong, was  
26 that when I asked whether a well file that  
27 had, you know, 14,000 pages or more would be  
28 useful operationally to engineers working on

1 the well during the course of their  
2 operations, you indicated that, I think,  
3 that's my point. SoCalGas produced all these  
4 documents to us related to well files, and  
5 that couldn't -- I think your -- you were --  
6 you were -- you were indicating you were  
7 making the same point. Do you agree?

8 A Yes.

9 Q And I then asked: Is that what  
10 your testimony says?

11 A My testimony says -- goes through a  
12 statement about how many pages -- including  
13 the footnote, how many pages were produced to  
14 us and represented as well file records for  
15 SS-25. I do say that those include a lot of  
16 duplicates. I'd say probably that I can tell  
17 you that there are a lot of duplicates in  
18 the -- those documents, and then I just make  
19 a quick statement that the well files that  
20 are shown in the cabinet drawers by  
21 Mr. Neville in his testimony don't -- aren't  
22 that big. So I think my point is that  
23 something doesn't match up here. You can't  
24 have 14,000 pages in a well file.

25 Q Ms. Felts, isn't it also possible  
26 that SED was asking SoCalGas for the same  
27 overlapping records over and over again?

28 A I don't think we did, but I suppose

1 you -- earlier -- earlier data requests may  
2 have been overlapping. I -- I haven't  
3 noticed that; but, that could possibly  
4 explain some of this.

5 Q Is it also possible that when  
6 you're referring to well file records, it  
7 actually meant well-related records that may  
8 not be stored in the well file?

9 MR. GRUEN: Objection, your Honor,  
10 calls for speculation.

11 THE WITNESS: I don't think we asked  
12 for that, but --

13 ALJ POIRIER: Ms. -- Ms. Felts, let  
14 me -- let me respond first.

15 I'll allow the question, but I think  
16 if, Mr. Stoddard, you can wrap this up, I  
17 think we've had a lot of questions on this.

18 So Ms. Felts, please, go ahead and  
19 answer the question.

20 THE WITNESS: I was trying to be very  
21 careful when I filed these into a folder for  
22 SS-25 well files that I was truly putting  
23 into that folder files that were represented  
24 as well files. And if I misunderstood the  
25 response from SoCalGas, then perhaps I put  
26 something else into a well file folder of  
27 mine that didn't belong there. But, I have  
28 no way of knowing if, in subsequent emails --

1 I mean -- I mean data responses if SoCalGas  
2 provided a bunch of PDF pages, and there's no  
3 folder or identification of where they came  
4 from, but they're in a response to a request  
5 for well files then I had to assume that they  
6 were part of a well file production.

7 MR. STODDARD: Okay. We can move on.

8 If we could turn to Exhibit 47 --

9 ALJ POIRIER: Just for notice, I think  
10 we're going to go around ten more minutes.

11 MR. STODDARD: Yeah. I think I can  
12 conclude this line of questioning in ten  
13 minutes --

14 ALJ POIRIER: Great.

15 MR. STODDARD: -- your Honor.

16 ALJ POIRIER: Go ahead.

17 MR. STODDARD: Thank you.

18 If we could please put up Exhibit  
19 Number 47, this is the amended opening  
20 testimony of Ms. Felts, and we're going to  
21 turn to pages 47 through 50 -- actually,  
22 we'll start with page 50. And this is marked  
23 SoCalGas-47.0054, and this is -- if you'd  
24 scroll up, please -- from the section related  
25 to realtime pressure monitoring. And please  
26 go to where it states SoCalGas violated  
27 Section 451 by not having -- SoCalGas  
28 violated Section 451 by not having a

1 continuous pressure monitoring system for  
2 well surveillance because it prevented an  
3 immediate identification of the SS-25 leak  
4 and accurate estimation of the gas flow rate.

5 Q Do you see that?

6 A Yes.

7 Q And Ms. Felts, are you aware of any  
8 requirements that mandated the use of  
9 realtime pressure monitoring prior to the  
10 leak?

11 A No, there's no requirement, but  
12 SoCalGas obviously recognized the need,  
13 because they were already planning to install  
14 it.

15 Q They were trying -- they were --  
16 they were in the course of installing it.  
17 Correct?

18 A I think my understanding is they  
19 had already identified it as part of their  
20 future SIMP program, possibly a need --  
21 something they needed for that program, and  
22 had installed it at one of the other  
23 underground storage facilities, and were  
24 moving to install it at Aliso.

25 Q And Ms. Felts, where you say,  
26 "SoCalGas violated Section 451 by not having  
27 a continuous pressure monitoring system  
28 because it prevented an immediate

1 identification of the SS-25 leak," are you  
2 contending that SoCalGas did not respond  
3 quickly enough to the leak?

4 A No, that's not what that says. I  
5 think the point of this testimony is that had  
6 they -- had they installed that equipment  
7 previously to the failure of SS-25, I think  
8 Blade's position is that there may have been  
9 an indication of or a warning that the leak  
10 was about to occur or some leak had already  
11 occurred, and it would have given a little  
12 bit of extra time to respond.

13 Q Okay. If we could please turn to  
14 the sentence that says, on the same page  
15 above, "Industry technology has evolved for  
16 realtime pressure, temperature flow and  
17 vibration (noise) monitoring, but  
18 surprisingly, there were no significant  
19 differences in the monitoring plan from 1989  
20 compared to the 2014 SoCalGas 224.070  
21 operation standard." Do you see that?

22 A Yes.

23 Q Isn't that the standard that we  
24 were just looking at in the gas safety -- the  
25 2012 SoCalGas Gas Safety Plan, Ms. Felts?

26 A Yeah, I think we were looking at a  
27 224-something.

28 Q .070?

1           A    Did it say, "operation standard" on  
2   that list?

3           Q    That's your language.

4           MR. GRUEN:  Your Honor, if I may, the  
5   witness is -- is in need of the document to  
6   be shown again.

7           ALJ POIRIER:  Let's bring up the prior  
8   document, Mr. Stoddard, if we can.

9           MR. STODDARD:  I can -- I can move on,  
10  your Honor.  I can -- my question -- my  
11  primary question on this is a different  
12  issue.  So I'll just move on, and I can  
13  circle back on that in a moment.

14          ALJ POIRIER:  Okay.  Go ahead.

15          MR. STODDARD:  Thank you, your Honor.

16          Q    Ms. Felts, can you describe exactly  
17  which, you know -- what the basis is for your  
18  statements -- or rather, the basis for the  
19  statement that -- where you're saying that  
20  industry technology has evolved for realtime  
21  pressure, temperature, flow and vibration  
22  monitoring is the -- simply the Blade report.  
23  Is that correct?

24          A    Yes.

25          Q    And you don't have any independent  
26  knowledge regarding the evolution of  
27  technology on realtime pressure monitoring,  
28  do you?

1           A     Well -- well, I -- in the past, way  
2 past, I designed a system for realtime  
3 pressure monitoring on a -- a set of reactors  
4 for Celanese Company, and since then, I have  
5 installed or -- I haven't personally  
6 installed it, but written contracts that have  
7 realtime pressure monitoring installed on  
8 equipment for "D" -- the Department of  
9 Defense, and used that technology, some  
10 contracts that we -- that I handled for  
11 environmental work. So it's not foreign to  
12 me, and certainly, it has evolved over time.

13           Q     Okay. How has it evolved?

14           A     Just the -- well, I mean the -- the  
15 original pressure monitoring system that I  
16 designed a replacement for had a drum timer,  
17 no electronics. So then it evolved into  
18 electronics that are wired, and then it  
19 evolved into probably, in some instances,  
20 wireless technology; so it's just followed  
21 the evolution of technology, in general.

22           Q     And Ms. Felts, when you were  
23 referring to reactors earlier, can you  
24 explain what you meant there?

25           A     When I worked for Celanese, we were  
26 making a guar product for fracking wells, and  
27 the way to make that have the kind of  
28 properties that are necessary to be able to

1 pump it down the well with and carry, you  
2 know, walnut shells or something with it, and  
3 then have it liquefy and come back up, be  
4 able to pump it back up, you had to react it  
5 with another -- a catalyst and another  
6 chemical, which I don't need to disclose  
7 here, and so we did that in giant reactors,  
8 huge -- huge drums, that you'd put the guar  
9 and the chemicals and the catalyst in, and  
10 then it would actually right -- the  
11 temperature in the drum would increase, and  
12 therefore, the pressure would increase during  
13 that process, and you had to monitor it.

14 Q Thank you. Not -- not related to  
15 gas storage operations?

16 A No.

17 Q Okay. And -- and in general, your  
18 prior experience with -- with realtime  
19 pressure monitoring isn't related to the gas  
20 storage industry. Correct?

21 A It's all the same; doesn't have to  
22 be related to gas storage to be relevant.

23 Q You mean with -- with regards to  
24 the technological advancements?

25 A Or the technology itself, yes.

26 Q Okay. If we could refer back  
27 quickly -- and do you recall that the -- that  
28 number, the -- the gas standard 224.070?

1 A Yes.

2 MR. STODDARD: And then let's refer  
3 back to Exhibit Number 144 quickly, please.

4 ALJ POIRIER: Let's go off the record.  
5 (Off the record.)

6 ALJ POIRIER: Back on the record.  
7 Go ahead.

8 BY MR. STODDARD:

9 Q I'm referring to Exhibit 144,  
10 page -- this is SoCalGas-144.0127. And do  
11 you see that, Ms. Felts? And again, going  
12 back up to -- I'm sorry. I read the wrong  
13 page into the record. Strike that.

14 We're looking at page  
15 SoCalGas-144.0125, and it's policy number  
16 224.070. Do you see that, Ms. Felts?

17 A Yes, titled --  
18 (Crosstalk.)

19 THE WITNESS: "-- Gas Inventory."

20 BY MR. STODDARD:

21 Q Yes. That's the same gas standard  
22 related to, again, monitoring, verification,  
23 and -- and it includes well integrity  
24 monitoring that you referred to in your  
25 opening testimony. Correct?

26 A Yes.

27 Q Okay.

28 A Yeah.

1           Q    And this was included in SoCalGas's  
2   2012/2013 safety plan, which was approved by  
3   the Public Utilities Commission.  Correct?

4           A    It was filed with the Commission.  
5   I -- I don't know about the approval part.

6           Q    Okay.  All right.  Thank you.

7           ALJ POIRIER:  Let's go off the record.

8                   (Off the record.)

9           ALJ POIRIER:  I'm going to go back on  
10  the record right now.

11                   While we were off the record, we  
12  handled some housekeeping matters.  One of  
13  them was the identification and delivery of  
14  cross-examination estimates, and some  
15  instructions were given there.  We were also  
16  given instructions of the witnesses to have  
17  copies of their testimony readily available  
18  when they are being cross-examined.

19                   Mr. Stoddard?

20           MR. STODDARD:  Thank you, your Honor.  
21  There was one other question I just had on --  
22  that probably was a housekeeping item, but I  
23  may not have been seen, which had to do --  
24  which is relevant to kind of the timing and  
25  service of exhibits for Cal Advocates.  I  
26  don't believe we know exactly which order the  
27  witnesses are being presented in.  It would  
28  probably make the most sense for them to be

1 presented in the order of testimony, but I  
2 just wanted to confirm.

3 ALJ POIRIER: Let's go off the record  
4 for a second.

5 (Off the record.)

6 ALJ POIRIER: Let's go back on the  
7 record.

8 While we were off the record, we  
9 clarified the order of Cal Advocates'  
10 witnesses.

11 Right now, I'd like SoCalGas to  
12 detail the cross exhibits that it was  
13 used today -- that used today. Please go  
14 so -- please do so.

15 MR. STODDARD: Yes, your Honor.

16 Exhibits Number SoCalGas-126 -- I'm  
17 giving a brief description -- which is  
18 SoCalGas's Ninth Set of Data Requests to SED;  
19 SoCalGas-127, SED's Response to SoCalGas's  
20 Data Request Number Nine; SoCalGas-58, which  
21 is SoCalGas's Fifteenth Set of Data Requests  
22 to SED; SoCalGas-59, which is SED's Response  
23 to Data Request 15; SoCalGas-60, SED's  
24 Supplemental Response to Data Request 15,  
25 Questions 1-A, 1-E through "F," 2, 3, 4-A,  
26 5-A through "B," 11-A through "B," and 12-A  
27 through "C," SoCalGas-135, which is American  
28 Petroleum Institute Recommended Practice 585

1     dated April 2014; Cal PA-401, which is  
2     Interoffice Correspondence from R.M. Hejazi  
3     to M.E. Melton, September 28th, 1988, for a  
4     Workover Recommendation for SS-9 Aliso  
5     Canyon -- I'm sorry. That was the wrong --  
6     no, that was the right description. There  
7     might be an error in our exhibit list. There  
8     appears to be a Cal -- two Cal PA-401s, or  
9     several Cal PA-401s. I just want to make  
10    sure I have the right one. Hold on one  
11    moment, please.

12           ALJ POIRIER: Off the record.

13                   (Off the record.)

14           ALJ POIRIER: Back on the record.

15                   Continue.

16           MR. STODDARD: We have a -- a pincite  
17    in our exhibit list for -- for exhibits that  
18    have -- where the exhibit's broken out. So  
19    to replace the -- the -- if we can strike my  
20    prior description of Cal PA-401, it's Cal  
21    PA-401, Project Approval Letter, pincite 486,  
22    page 486 to page 487, and then Exhibit 145,  
23    Agenda for DOG Annual Review Meeting for  
24    Aliso Canyon, May 26th, 1988; Exhibit  
25    SoCalGas-146, SoCalGas Annual Review Meeting  
26    with the Division of Oil & Gas, 1990; Exhibit  
27    Number SoCalGas-143, Letter to Timothy  
28    Sullivan from Rodger Schwecke, March 30th,

1 2017 Re: Storage Enhancement Plan;  
2 Exhibit 124, Email from Darryl Gruen to  
3 Margaret Felts, April 24th, 2020 Re: Gas  
4 Safety Plan; SoCalGas-125, CPUC Gas Safety  
5 Plan; Exhibit SoCalGas-61, Letter from  
6 Timothy Sullivan to Rodger Schwecke Re:  
7 Aliso Canyon Natural Gas Storage Facility,  
8 March 16th, 2017. ]

9 SoCalGas-128, SED's Response to  
10 SoCalGas' Data Request 9, Questions 10  
11 through 12, May 15, 2020.

12 And SoCalGas-147, Agenda for DOG  
13 Annual Review Meeting for Aliso Canyon,  
14 June 13, 1989.

15 SoCalGas-144, SoCalGas' Natural Gas  
16 Operator Safety Plan, 2012.

17 And then there are other exhibits  
18 we used today, but they were identified  
19 before. I am assuming I don't have to  
20 identify those again.

21 ALJ POIRIER: No.

22 MR. STODDARD: Thank you.

23 (Exhibit No. SoCalGas-126 was marked  
24 for identification.)

25 (Exhibit No. SoCalGas-127 was marked  
26 for identification.)

27 (Exhibit No. SoCalGas-58 was marked  
28 for identification.)

(Exhibit No. SoCalGas-59 was marked  
for identification.)

1 (Exhibit No. SoCalGas-60 was marked  
for identification.)

2 (Exhibit No. SoCalGas 135 was marked  
3 for identification.)

4 (Exhibit No. CAL PA-401 was marked  
for identification.)

5 (Exhibit No. SoCalGas-145 was marked  
6 for identification.)

7 (Exhibit No. SoCalGas-146 was marked  
for identification.)

8 (Exhibit No. SoCalGas-143 was marked  
9 for identification.)

10 (Exhibit No. SoCalGas-124 was marked  
for identification.)

11 (Exhibit No. SoCalGas-125 was marked  
12 for identification.)

13 (Exhibit No. SoCalGas-61 was marked  
for identification.)

14 (Exhibit No. SoCalGas-128 was marked  
15 for identification.)

16 (Exhibit No. SoCalGas-147 was marked  
for identification.)

17 (Exhibit No. SoCalGas-144 was marked  
18 for identification.)

19 ALJ HECHT: I just want to break in for  
20 a moment to say if you saw me leap a couple  
21 of minutes ago, it was due to a noise in my  
22 home and it has nothing to do with this case,  
23 but I didn't want you to see anything and  
24 think I was reacting to anything here. It  
25 was a dog barking. Sorry.

26 MR. STODDARD: Thank you.

27 ALJ POIRIER: One thing more I want to  
28 handle before the end of the day.

1           I think SoCalGas had a motion to  
2 strike yesterday portions of Ms. Felts'  
3 testimony. I think we're going to deny that  
4 without prejudice at this point. I think it  
5 sounds like we want to hear more about from  
6 Blade on some of those topics and that can be  
7 revisited at a later time.

8           So that motion to strike is denied  
9 without prejudice at this time.

10           So I think that concludes what I  
11 want to handle.

12           Are there any other housekeeping  
13 matters that any of the parties want to  
14 raise?

15           Mr. Gruen.

16           MR. GRUEN: Your Honor, just -- I think  
17 I just want to be clear your Honor's  
18 instruction that we should be ready for  
19 redirect is loud and clear. And if I am  
20 tracking right, I just want to be sure  
21 Mr. Stoddard had indicated that we've got  
22 about an hour of cross left for Ms. Felts I  
23 think earlier in the day, and I am just  
24 wondering if he has a calibration for his  
25 cross-estimate starting tomorrow morning.

26           MR. STODDARD: I think, as I said  
27 earlier, I need to go back and cut -- I need  
28 to kind of see what I can cut out just to get

1 done with this tomorrow morning. A lot of it  
2 depends on the pace of answers and other  
3 things like objections as well. So it's hard  
4 exactly to pin down of course, but I am  
5 anticipating for sure that we will be able to  
6 wrap it up in the morning and I am hoping to  
7 get it in around an hour, maybe a little bit  
8 more.

9 ALJ POIRIER: Okay. And I encourage  
10 you to -- oh, Ms. Patel, please go ahead.

11 MS. PATEL: Oh. My comment is on a  
12 different topic.

13 ALJ POIRIER: Okay. It makes sense.  
14 If possible, I encourage you guys to  
15 communicate to the parties if there is news  
16 to provide us an e-mail for notice tomorrow  
17 morning.

18 Ms. Patel.

19 MS. PATEL: Thank you, your Honor.  
20 Avisha Patel on behalf of SoCalGas.

21 I just wanted to clarify, I think  
22 your Honor was reading from the Cal  
23 Advocates' cross-estimate list when you  
24 identified the order in which they would  
25 appear. But our scheduled order of  
26 appearance is actually for the panel to go  
27 first and then for Mr. Bach, Mr. Taul and  
28 Mr. Holzchuh.

1 ALJ POIRIER: That's fine.

2 MS. PATEL: Is that correct?

3 ALJ HECHT: Yes, it is.

4 ALJ POIRIER: Okay. Thank you for the  
5 clarification.

6 Mr. Stoddard, do you have anything  
7 -- any housekeeping before we go?

8 MR. STODDARD: No, your Honor. Thank  
9 you.

10 ALJ POIRIER: Okay. We are going to  
11 start tomorrow at 10:00 a.m., again.

12 Again, everybody please get on a  
13 little bit early, so we can make sure all the  
14 AV is set. I want to thank everybody again  
15 and have a good evening and take care. Thank  
16 you. We will be off the record.

17 (Off the record.)

18 (Whereupon, at the hour of 4:03  
19 p.m., this matter having been continued  
20 to 10:00 a.m., March 19, 2021, the  
Commission then adjourned.) ]

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BEFORE THE PUBLIC UTILITIES COMMISSION  
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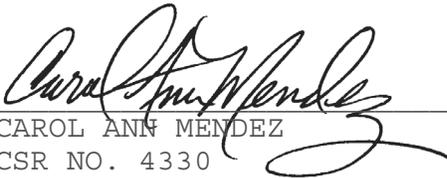
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	<b>128</b> 423:12	<b>1952</b> 330:7	448:1
-	<b>12:07</b> 365:21	<b>1969</b> 330:6	<b>2015</b> 413:6
<b>-47.0004(sic)</b> 360:20	<b>12a-c</b> 310:12	<b>1970</b> 330:6	<b>2017</b> 401:10,18 402:4 404:19 449:1,8
<b>0</b>	<b>13</b> 347:1,16 372:15 377:14 385:14 449:14	<b>1980</b> 330:6	<b>2019</b> 360:8
<b>0002</b> 369:17	<b>13,000</b> 431:2	<b>1987</b> 370:26	<b>2020</b> 341:2 343:14,15 372:7,8 418:28 419:21 423:20 449:3,11
<b>0020</b> 375:10	<b>13,000-some</b> 434:12	<b>1988</b> 332:20 338:19 340:4,10,12,22 353:15 354:16,21 357:9,25,28 358:13 368:21 369:4 370:26 373:12 375:20 376:5 377:17 448:3,24	<b>2021</b> 372:8 419:13
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