

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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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
May 4, 2021
Pages 1902 - 2032
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VIRTUAL PROCEEDING

MAY 4, 2021 - 10:00 A.M.

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ADMINISTRATIVE LAW JUDGE POIRIER:

We'll be on the record. Good morning. This is Administrative Law Judge Marcelo Poirier. This is the continuation of the evidentiary hearings in Investigation 19-06-016 regarding Aliso Canyon. This is Tuesday, May 4th, I believe, and we are continuing with the cross-examination of Mr. Neville by SED.

Mr. Gruen, please go ahead.

Mr. Gruen, you are muted.

MR. GRUEN: Pardon me. Thank you, your Honor. Can I be heard? Okay. I'm seeing nods. Thank you.

DAN NEVILLE,

resumed the stand and testified further as follows:

CROSS-EXAMINATION RESUMED

BY MR. GRUEN:

Q Good morning, Mr. Neville.

A Good morning, Mr. Gruen.

Q Okay. So if we can, adding to where we left off yesterday, I want to start with a new line of questions by introducing an exhibit that SoCalGas used. It's Exhibit SoCalGas-70.

1 Mr. Zarchy, if you could share
2 that.

3 You see here this is a response to
4 Data Request 58, so this was a response to
5 SED from Blade Energy Partners. If we go to
6 the Bates number at the bottom for the
7 record, we can identify the page number as
8 SoCalGas-70.0001.

9 If we turn to the page which has
10 the Bates Number 70.0045, if you would,
11 Mr. Zarchy. Thank you. That's the Bates
12 number I just referenced, SoCalGas-70.0045.

13 Do you see there this document
14 shows it was a noise and temperature survey
15 log; is that right?

16 A Yes.

17 MR. GRUEN: Mr. Zarchy, I wonder if
18 it's possible to enlarge that slightly.
19 Thank you. That's great.

20 Q Is that more legible to you,
21 Mr. Neville, on your screen?

22 A Yes, that's better.

23 Q Okay. Thank you. This is a noise
24 and temperature survey of Well SS-25 from
25 July 27, 1984; correct?

26 A Yes.

27 Q In the survey box, the stated
28 purpose of the survey is to check for gas

1 leakage at the casing shoe and/or the WSO;
2 correct?

3 A Yes.

4 Q The "Results and Remarks" box says,
5 "No indication of any gas leakage."

6 Do you see that?

7 A Yes.

8 Q Mr. Neville, are you aware that
9 SoCalGas counsel specifically used Figure 6
10 shown here to cross-examine SED's witness
11 Ms. Margaret Felts?

12 A No.

13 Q Okay. And in your reply testimony,
14 page 13, lines 2 to 3, you reference a survey
15 from July 1984.

16 Do you recall?

17 A Yes.

18 Q Let me just ask you about the
19 nature of what we're seeing here on the
20 screen in Figure 6 here.

21 If you could scroll down slightly,
22 Mr. Zarchy, just to show the figure, the
23 Figure 6 number.

24 Does Figure 6, as we're looking at
25 it here, show a complete noise and
26 temperature survey log?

27 A No, it appears to be just the
28 heading.

1 Q Just the heading, okay.

2 Mr. Neville, do you know -- did SoCalGas
3 provide Blade with the complete noise log
4 from July 27, 1984?

5 A I don't know.

6 Q Okay. Do you know why SoCalGas
7 counsel cross-examined SED's witness with an
8 incomplete SS-25 noise log?

9 A Well, I didn't know that there was
10 cross-examination regarding this log, so I
11 just don't know.

12 Q Fair point.

13 A I wasn't aware.

14 Q Point taken. That will be my last
15 question about that then. Point taken.
16 Before we leave the document, if we continue
17 down to the fourth line --

18 We're fine, Mr. Zarchy. We're fine
19 where we are.

20 The fourth line in the paragraph
21 says:

22 Casing shoe leaks (i.e., gas from
23 storage zone traveling out of that
24 zone behind casing) were not the
25 focus - these types of leaks would
26 not have any bearing on the
27 corrosion and subsequent casing
28 failure at 892 feet.

1 Do you see that?

2 A Yes.

3 Q Okay. So is it your understanding
4 that Blade was not focusing on whether there
5 were leaks in Well SS-25 below the casing
6 failure at 892 feet?

7 MR. LOTTERMAN: Objection, calls for
8 speculation.

9 MR. GRUEN: I can rephrase, your Honor.

10 ALJ POIRIER: Yes, please go ahead.

11 MR. GRUEN: Okay. Thank you.

12 Q To your knowledge, specifically
13 with what you know, do you know if Blade was
14 focusing on whether there were leaks in
15 Well SS-25 below the casing failure at
16 892 feet?

17 A I do not know.

18 Q Okay. I'll move on. Now that
19 we've seen the version of this noise log,
20 let's take -- I'll look at another version.
21 If we could turn to Exhibit SED-262. If we
22 could go to the bottom and right just so I
23 can identify the Bates numbers here. If you
24 could enlarge that slightly.

25 So for the record, this is
26 AC_CPUC_SED_DR_30_0001174.

27 Scroll around if you'd like,
28 Mr. Neville, to identify it, but first of

1 all, do you recognize this as part of the
2 SoCalGas data response to SED Data
3 Request 30?

4 A Well, I do recognize it as a noise
5 temperature log run on SS-25 dated
6 7-17-84(sic). I think that's the same log we
7 were talking about earlier. Yes, it looks
8 like it was.

9 Q Fair enough. That's very helpful
10 to move things along. Thank you. And let's
11 see, this survey -- I think you just
12 clarified, but it's showing temperature and
13 noise. We'll get to the --

14 If we could scroll down,
15 Mr. Zarchy.

16 If we look at the temperature
17 line -- first of all, yeah, if we scroll to
18 the right, the graph on the right, maybe I
19 can just clarify which graph is which here.
20 The one that's on the right of the screen is
21 the temperature log; is that correct?

22 A Yes.

23 Q And the one on the left, then, is
24 the noise; correct?

25 A Yes.

26 Q Okay. I think it's hard to see,
27 but just to refresh my memory, the noise log
28 is showing the four lines on the left which

1 are picking up the different frequencies; is
2 that right?

3 A Yes.

4 Q Okay. Let's scroll toward the
5 bottom, Mr. Zarchy. If you could scroll
6 down, keep going, right to the bottom.

7 Just for further orientation
8 purposes of this document, we see a set of
9 numbers going down the left and I think the
10 right side also, which seems to -- where
11 we're looking here, it starts at 6,800 and
12 goes to 7,000, 7,200 and so forth, all the
13 way down to 8,000.

14 Do you see that on the left side of
15 the screen?

16 A Yes.

17 Q Is that measuring the depths of the
18 well for where the reading is in feet?

19 A Yes.

20 Q Okay. And so the noise survey
21 seems to be -- would you agree it seems to be
22 showing crooked lines starting at
23 approximately 8,400 feet?

24 Would you agree with that estimate?

25 A Yes. Yes.

26 Q Okay. The temperature survey here
27 shows another -- we were using the term
28 "zigzag." So there's another zigzag here at

1 approximately 8,400 to 8,600 or so feet.

2 Would you agree?

3 A Yes.

4 Q Okay. If we were to call for a
5 comparison with the July 10, 1985, survey
6 that we looked at yesterday, that survey
7 showed a cooling anomaly or a zigzag at
8 similar depths of about 8,450 feet; isn't
9 that right?

10 A I believe so. I'll take your word
11 on it. It was below 8,400 feet. I do recall
12 that.

13 Q Okay. And maybe just to clarify
14 that we're talking about approximate numbers
15 in this case, does that help clarify?

16 A Yes.

17 Q Thank you. All right. Let's go
18 back to Exhibit SoCalGas-15. Just for a
19 refresher, it's page 13. This is the same
20 line that we've been looking at but a
21 different piece of it. It's on page
22 SoCalGas-15.0014 Bates number. If we scroll
23 to the middle of line 3 --

24 Mr. Zarchy, maybe if you could
25 enlarge it slightly. Thank you. Yeah.

26 Can you see that okay, Mr. Neville?

27 A Yes.

28 Q Okay. On line 3, it says in the

1 middle, "7-84 indicated no leak above S1."

2 Do you see that?

3 A Yeah. And if you mind, this --
4 giving -- given -- I need to clarify. That
5 RA period, the period shouldn't be there. It
6 does say, "Noise logs 7-84," which is the one
7 we were just looking at, "4-84, 2-83, and
8 RA 7-84 indicated no leak above S1." So
9 there are four logs there.

10 Q Understood. Thank you. So all
11 four -- if I'm understanding your
12 clarification, that means that all four logs
13 indicated no leak above S1 is your point.

14 Am I tracking that right?

15 A Yes.

16 Q Okay. So let's look at the
17 July 1984 noise log then with that
18 clarification. Actually, let me back up and
19 clarify. I think you'd explained S1 was a
20 kind of zone, but maybe if you could remind
21 us for the record what S1 means.

22 A Sure. The storage formation is the
23 Sesnon formation. Within that formation,
24 there's zones, separate sand zones that are
25 separated by shale sections. So the Sesnon
26 formation includes the S1, the S2, the S4,
27 the S6, the S8, and there's even more below
28 that.

1 Does that clarify?]

2 Q It -- it -- it helps. And maybe
3 it -- I thank you, Mr. Neville.

4 And could you clar- -- also tell us
5 approximately what depth S1 is in well SS-25?

6 A Well, yeah. I do -- you asked me
7 yesterday to -- to go and review the data for
8 that particular depth, and I -- I did look at
9 the -- the open-hole log, and I did confirm
10 that the S1 is at a depth -- the top of the
11 S1 sand is at a depth of 8395 feet.

12 Q 8395. Okay. Okay. That's -- and
13 you said the -- the top of S1?

14 A Yes. That's how sands are -- are
15 noted, as -- as the tops. They're a certain
16 thickness to each one of those sands, and the
17 top is at 8395.

18 Q Okay. And can -- does that tell
19 you where the entirety of the -- of S1 is,
20 then?

21 A Well, one would have to go to the
22 open-hole log to -- to -- to find exactly how
23 thick that sand is. I -- I can do that.
24 I -- I recall it's -- it's relatively thin
25 sand. It's like -- I think it was around
26 five feet -- five to ten feet thick.

27 Q Five to ten feet.

28 A Yeah.

1 Q Okay. So --

2 A I can review that. I -- I --
3 that's just my recollection. But, it's a --
4 it's a relatively thin sand.

5 Q Okay. Thank you. Sorry to have
6 interrupted. I -- I just want to be sure
7 you're -- you finished your answer before I
8 move on. Okay. I think I saw you nod.

9 So -- and are the -- we talked
10 about WSOs, water shutoffs, yesterday. Are
11 the WSOs, then, in well SS-25 related to S1?

12 A I'd have to look at the data to see
13 where that WSO would -- where those
14 perforations for the WSO were shot.

15 MR. GRUEN: Okay. And I'm wondering,
16 your Honor, can -- can we go off the record
17 for a moment?

18 ALJ POIRIER: Off the record.

19 (Off the record.)

20 ALJ POIRIER: We'll be back on the
21 record.

22 We're going to take a five-minute
23 break 'til 10:23.

24 MR. GRUEN: Thank you.

25 ALJ POIRIER: Off the record.

26 (Off the record.)

27 ALJ POIRIER: We will be back on the
28 record.

1 We took a -- a brief break.

2 Mr. Gruen, please continue.

3 MR. GRUEN: Thank you, your Honor.

4 Q With the discussion -- let's pull
5 up the July 1984 noise log again. Let's go
6 back to Exhibit SED-262.

7 MR. ZARCHY: Hi. This Daniel Zarchy
8 with SED. I'm just waiting for IT to give me
9 back presenter power after the break.

10 BY MR. GRUEN:

11 Q Okay. And if we scroll to the
12 bottom again where we were looking at the
13 zigzag and the crooked lines at the bottom,
14 Mr. Neville, does this document say whether
15 or not those crooked lines and the zigzag are
16 below S1, as you just identified?

17 A It would be -- sometimes the S1
18 is -- note is labeled. If you could expand
19 the log a little bit.

20 Q Sure. Where do you want us to go,
21 Mr. Neville --

22 A It would be --

23 Q -- on the line?

24 A It would be the far left track.

25 Q Okay. Do you want to enlarge that?

26 A Yeah.

27 Q Okay.

28 (Crosstalk.)

1 THE WITNESS: Yeah. It would have to
2 be even enlarged further. It's hard to read
3 as --

4 BY MR. GRUEN:

5 Q Can you -- do you want to speak to
6 where -- is WSO shown there, Mr. Neville?
7 It's hard for me to make it out. It may be,
8 but I can't tell. It might be just to the
9 left of the -- the screen there. Or the -- I
10 can't tell if those are the letters, WSO, or
11 not. What do you think?

12 A Right. I -- I can't tell, either.
13 I -- I do note that the S1 is not labeled,
14 because it -- if it were, it would be at
15 8395.

16 Q Uh-huh. Okay. Yeah. That --
17 that's helpful.

18 So whatever is shown here, we're
19 not able to tell the depths of either -- of
20 any of the -- the notations that are shown in
21 this enlarged portion of the graph. Is that
22 right?

23 A Well, there are depths there of
24 certain components of this well, and it
25 appears to be that there's depths of the
26 perforations; but, it's so hard to read, it
27 would -- I would definitely check the records
28 to -- to interpret this log.

1 Q Okay.

2 A It's difficult to read.

3 Q Okay. So -- so -- and we agree, we
4 can't -- you can't tell from this what depths
5 the different notations on this portion of
6 the graph are. Would that be fair to say?

7 A Well, the -- the -- the -- the
8 schematic is drawn with depth. It's hard to
9 get --

10 Q All right.

11 A -- the nearest point. You know,
12 you could see the bottom of the casing shoe
13 is at -- it looks like it's drawn at 84 -- or
14 about 80 -- maybe 85, 95. So it -- it is
15 drawn to depth, but it's difficult, the way
16 it's labeled, to tell what the components
17 are. It's just a -- it's a little
18 challenging.

19 Q Okay. Under -- understood.

20 This would -- if I can recall,
21 the -- the items you talked about, the
22 different logs that indicated no leak above
23 S1, if you recall that, do you recall that
24 from your testimony?

25 A Yes.

26 Q Let me just ask a question about
27 that, with this graph in mind.

28 Why would that wording specifically

1 say no leak was indicated above S1 like that,
2 unless SoCalGas saw an indication of a leak
3 somewhere deeper in well SS-25?

4 A So if you -- you know, you'll have
5 to scroll to the right to the noise track
6 where those four --

7 Q Okay.

8 A -- frequencies are.

9 Q Okay. Shall we zoom out?

10 A Zoom out a little, and scroll to
11 the noise track.

12 Q Okay.

13 A A little -- yeah, right there.

14 And it appears that there were two
15 runs made. So there's two sets of curves.
16 That's how I interpret that. The -- they
17 each show basically the same. There -- there
18 does appear to be noise response below 8400,
19 but there's no noise response above 8400.
20 And the idea that -- is that if -- if there
21 was a shoe leak, and it -- and gas were
22 moving out of the -- the -- the storage zone
23 and through the couple hundred feet of
24 caprock above it, that the noise would
25 continue well above 8400. It would continue
26 to -- to another area that we -- we call
27 the -- the MP zone, and it's -- it's a couple
28 hundred feet above the -- the S1. And I'd

1 have to look at the records to see exactly
2 where that is. But, the -- the short answer
3 is the noise stops below the S1.

4 Q I'm sorry. The noise stops below
5 the "S" -- the S1?

6 A Sorry. I misspoke. The noise
7 stops above the S1. It -- it -- there is
8 noise below it, which likely indicates some
9 gas moving, but there's no noise above the
10 S1.

11 Q Okay. Thank you. Mr. Neville,
12 turning to -- I want to ask some questions
13 now about another set of documents that are
14 along the lines of the anomalies and the
15 crooked lines on the -- the logs that we've
16 been looking at.

17 So if we could go back to Exhibit
18 SoCalGas-16, which is the exhibits to your
19 reply testimony, and we're at, again,
20 specifically exhibit roman VII-IV that was
21 referenced in footnote 29 of your reply
22 testimony yesterday. Do you recall, does it
23 look like we're at the right spot that I've
24 just described?

25 A Yes.

26 Q Okay. And again, we're -- just for
27 the record, if we could go to Bates number --
28 the page with Bates number 16 dash -- dot

1 0031, starting there, and we're -- thank you
2 for enlarging.

3 So this document was part of the
4 SS-25 well file as it existed during the --
5 the incident. Is that correct?

6 A That's what I would expect, yes.

7 Q Okay. And just the term -- with
8 regards to the term, well activity reports
9 for SS-25, at the top there, I want to ask
10 some questions about that.

11 Do all wells at Aliso have well
12 activity reports like what we're seeing here?

13 A Yes, they do; in my experience,
14 they do.

15 Q Okay. And for what purpose does
16 SoCalGas typically use its well activity
17 reports?

18 A Well, they were -- they were used
19 during a certain time period, it looks like,
20 from about the onset of storage to about
21 1996. That was the method for recording
22 various activities on the well, including
23 temperature surveys, noise logs, sand tests
24 and those types of activities.

25 Q Okay. Was this information
26 reported to DOGGR?

27 A No.

28 Q And I may not have clarified. I

1 may get this wrong.

2 What does DOGGR stand for, for the
3 record?

4 A Yeah, it's -- it's the Department
5 of Oil and Gas and Geothermal Resources.

6 Q Okay. And SoCalGas -- what -- at a
7 high level, what's your understanding of
8 DOGGR's relationship to SoCalGas?

9 A They're the -- the state regulatory
10 agency for our gas storage underground
11 activities that -- that took place, and still
12 does.

13 Q Okay. Just in that answer, do you
14 recognize that the Commission -- the
15 California Public Utilities Commission has
16 jurisdiction over Southern California Gas
17 Company, as well?

18 A I do know that -- that the
19 Commission does have jurisdiction over
20 Southern California Gas, yes.

21 Q Okay. Let's continue on with this.

22 So in terms of the purpose of this
23 well activity report, this is used, then --
24 it wasn't reported to DOGGR, I understood you
25 to say. Is it simply, then, for internal use
26 for SoCalGas?

27 A Yes, I would say that's correct.

28 Q Okay. And turning to the entry on

1 this page, 7-27-84, it happens to be right on
2 the screen, we're -- thank you, Mr. Zarchy.

3 Do you see that entry there?

4 A I'm sorry. Could you repeat?

5 Q Sure. 7-27-84, do you see that --
6 that date on the left column?

7 A Yes.

8 Q And so that entry represents
9 remarks about activity -- activity that
10 SoCalGas took on well SS-25 on July 27th,
11 1984. Is that right?]

12 A Yes.

13 Q And the activity on the 19 -- this
14 July 27, 1984 entry is based on the noise and
15 temperature survey from July 27, 1984 that
16 you were just examining; isn't that also
17 correct?

18 A Yes.

19 Q Okay. So the entry that we are
20 talking about, the entry shows:

21 Flo-log ran temperature survey,
22 which showed cooling from top
23 perms at 8510 feet -- 8510 feet to
24 8100 feet. Noise showed possible
25 gas movement from 8500 feet to
26 8220 feet. A R/A survey will
27 follow. Flo-log No. 285,
28 #3,228.15.

1 You see that?

2 A Yes.

3 Q So -- so then on July 28th, 19 --
4 I'm sorry -- July 29th, 1984, we see in the
5 second line that another R/A tracer survey
6 was then run by downhole injecting 100 mc of
7 tracer at 8530 feet with well shut-in. And,
8 again, the notation is, "small amount of gas
9 movement was detected from 8510 feet to 8190
10 feet. A recommendation is forthcoming.

11 You see that as well?

12 A Yes. I would clarify that then
13 only one R/A survey was run. It -- on
14 7-27-84, it says, "an R/A survey will
15 follow," and then on 7-29-84, the actual R/A
16 tracer survey was run.

17 Q Point taken, Mr. Neville, and I
18 appreciate the correction. Thank you.
19 Understood. Let's continue down the -- the
20 entries here and go to the one -- we're fine
21 where we are, Mr. Zarchy -- 4-24-85. And if
22 we look, it says on the second line, "July
23 1984 noise log and tracer survey indicated
24 small shoe leak," correct?

25 A The -- yes.

26 Q So the shoe leak there, as shown by
27 the notation, was in the casing shoe of
28 SS-25, correct?

1 A That's what that notation says
2 there at that time on that date, that there
3 is indication of a small shoe leak.

4 Q And that's the case -- the
5 indication of the small shoe leak there is
6 shown even though the July 27th, 1984
7 temperature and the noise log header said no
8 indication of shoe leak; isn't that correct?

9 A That's correct.

10 Q Okay. Okay. Let's look at another
11 noise log, and the R/A survey that you
12 mention on page 13, lines 2 to 3, and you
13 mention the noise surveys from 4- -- April of
14 '84 and February of '83. Do you recall that?

15 A Can you say the dates again.

16 Q Sure. And we can go back, if you
17 like, but from your reply testimony, I'm just
18 refreshing for the record, page 13, lines 2
19 to 3. We're continuing on with the reference
20 to the documents that you mentioned there.
21 So you talk about noise log 7-84, 4-84, 2-83
22 and R/A. And you said no period. So 7-84.
23 You're referencing all those. So we're
24 continuing on from your reference to those
25 documents.

26 Are you with me?

27 A Yes.

28 Q Okay. So let's look at the 4-84

1 one, which I understand to be the April 1984
2 noise log -- would you agree -- as referenced
3 there?

4 A Yes.

5 Q Okay. So if we go to Exhibit
6 SED-263, and if we scroll down -- and if we
7 could scroll to the bottom just so I could
8 read the Bates number into the record. And
9 we have here: AC_CPUC_0000171, and if we
10 could zoom out. Thank you. If we zoom out
11 and enlarge a little bit at the top. That's
12 helpful. Thank you.

13 So, Mr. Neville, do you recognize
14 this as the April 1984 noise log that you
15 reference in your testimony?

16 A Yes.

17 Q And it also includes a temperature
18 survey. You recognize that also from April
19 of 1984?

20 A Yes.

21 Q Okay. So scrolling to the bottom
22 of the document, let me just ask you
23 generally, this was also part of the SS-25
24 well file at the time of the incident; is
25 that right?

26 A I would expect this log to be in
27 that well file. Yes.

28 Q Okay. If we could enlarge it to

1 around where the number -- around at the
2 bottom, if you could enlarge slightly, Mr.
3 Zarchy. Keep going. Not to -- I'm sorry. I
4 should have clarified. Zoom out slightly,
5 please. Keep going. More. And if we
6 could -- no. Let's scroll out all the way
7 out again. I'm looking for a particular
8 notation on the document. I'm sorry for this
9 being a little bit unwieldy.

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

11 (Off the record.)

12 ALJ POIRIER: Back on the record.

13 MR. GRUEN: Okay.

14 Q Mr. Neville, so this document, in
15 the remarks, as of April 1984, notes that
16 there's possible slight shoe leakage
17 migrating higher than 8440 feet.

18 Do you see that?

19 A Yes.

20 Q And it's noting a temperature break
21 at around 6800 feet as well, correct?

22 A Yes.

23 Q Okay. Now we scroll down all the
24 way to the bottom and zoom out just to,
25 again, note here, once again, at this point
26 in time, April of 1984. Again, we've got the
27 crooked lines and the anomaly at
28 approximately between 8400 and 8500 feet.

1 Would you agree, Mr. Neville?

2 A Yes.

3 Q And the survey then was picking up
4 noise at that approximate depth?

5 A Yes.

6 Q Of a possible leak?

7 A Right. I believe the comments
8 were, "possible shoe leak above 8600,"
9 something to that extent.

10 Q Okay. And just for the record, the
11 temperature survey, then, is showing two
12 zigzags or temperature anomalies, if you
13 will; is that right?

14 A Yes.

15 Q Okay. Let's go to the references
16 you made to the R/A tracer survey in your
17 reply testimony. You remember talking about
18 that where we were on page 13, lines 2 to 3?

19 A Yes.

20 Q Okay. So if we introduce -- if we
21 could go to Exhibit SED-264, and this is
22 the -- Mr. -- oh, sorry. Let me read in the
23 Bates number -- Bates No. AC_CPUC_0206538.
24 And if -- thanks, Mr. Zarchy. If we could
25 zoom out to see the whole document.

26 Mr. Neville, do you recognize this
27 as the R/A tracer survey from July 1984 that
28 you referenced in your testimony?

1 A Yes.

2 Q Okay. And that's -- and you see
3 that's for Well SS-25, correct?

4 A Yes.

5 Q The purpose of the survey there
6 shown, check the leakage at or above the
7 shoe, correct?

8 A Yes.

9 Q And if we scroll to the bottom, the
10 remarks say, "possible slight leakage behind
11 pipe from top perf at 8510 feet up to around
12 8430 and 8190 feet," correct?

13 A Yes.

14 Q What do those words mean to you?

15 A I believe that they are part of the
16 investigation of a potential shoe leak in
17 this well. And as I mentioned before, the
18 diagnosis of a shoe leak is very difficult.
19 It's a small amount of gas moving through
20 typically an annulus area within the cement.
21 So they are difficult to diagnose. They are
22 run at -- the noise logs, I see, were run at
23 different pressures. The April noise log was
24 run at a lower pressure to the July noise
25 log. I didn't catch the pressure, but
26 typically the pressure would be higher.

27 One has to look at all of the data
28 that's there and make some assessment as to

1 whether or not a shoe leak exists and a
2 workover rig should be placed. So the short
3 answer to your question is this is all
4 remarks about the possibility -- a possible
5 shoe leak.

6 Q Okay. Thank you. And this --
7 because we're talking about the wording
8 behind the pipe at these depths, isn't that
9 an indication of gas ascending on the outside
10 of the production casing?

11 A Well, at those depths listed, 8430,
12 that is below the S1, which was 8395. The
13 8190, if it does give that depth, that's
14 higher than the S1. But, again, the word is
15 "possible." And these -- these R/A tracer
16 surveys can be very difficult to do, you
17 know, to confirm a shoe leak. I think --
18 yeah, I've seen R/A tracer surveys where they
19 don't use the word "possible." You know,
20 there's a much clearer case of a shoe leak
21 than this well.

22 So again, I think it it's part of
23 the investigation. There's -- at the end
24 of -- of these extra logs that were run, you
25 know, to help identify or to help analyze the
26 noise logs, again, I have to go to the final
27 comment in the record after the final noise
28 log, and that comment there in July of '84

1 had the benefit of seeing all of the previous
2 data and I suspect even at a higher pressure.
3 But I would have to go look at the pressure
4 at that -- the July log. I don't know
5 offhand, but it's -- again, it's a -- it's a
6 summation of all the logs that one would use
7 to get to the confirmation.]

8 Q And just to go back to the
9 question, I don't think I got an answer to
10 the question. I just want to be sure. The
11 question was the notation of possible slight
12 leakage behind pipe there, isn't that an
13 indication of gas ascending on the outside of
14 the production casing?

15 I wasn't clear on the answer.
16 Perhaps you did answer and I missed it, but
17 could you answer that question directly.

18 A Oh, sure. That's the reason for a
19 tracer, and that's like leakage behind pipe
20 would be outside of the production casing.

21 Q Okay. So it's leakage outside and
22 ascending as well?

23 A Yes.

24 Q Okay. Thank you, Mr. Neville. I
25 appreciate it. Let's go back up to the well
26 sketch of SS-25 from 1984 if we could. I
27 think that's Exhibit 265 if we could go
28 there. I should start reading this, pardon

1 me, SED-265, SS-25 Well Sketch, and if we
2 could scroll down to the Bates number.

3 So we see the Bates number as
4 AC_CPUC_SED_DR_30_0000778.

5 Do you recognize this document,
6 Mr. Neville?

7 A Yes.

8 Q If we can zoom out slightly on it.
9 I'm looking for the term "Pkr" on it. I
10 think it's towards the left. Do you see
11 where the cursor is showing "Pkr" and next to
12 it "8,486 feet"?

13 A Yes.

14 Q So that shows the SS-25 packer at
15 8,486 feet down from surface; correct?

16 A That's correct.

17 Q Okay. I think that with the
18 notation, it is of the 8,510 feet,
19 8,430 feet, and the 8,190 feet of gas
20 migrating. If you recall that from the R/A
21 tracer survey, the possible slight leakage
22 behind the pipe and gas ascending, what I'm
23 trying to understand here is if the R/A
24 tracer survey showed gas ascending around the
25 packer, given the depth of the packer here.

26 Let me couch that as a question if
27 I can. Given the remarks on this R/A tracer
28 survey that there was possible slight leakage

1 behind the SS-25 pipe from 8,510 feet, up to
2 and around 8,430 feet and 8,190 feet, did
3 SoCalGas confirm or does that show, let me
4 ask, that gas was ascending around the
5 packer?

6 A R/A tracer surveys are run with
7 some gas on injection. So it would -- the
8 gas would go down the bottom of the tubing
9 and through the perfs and ascend around the
10 packer.

11 Q Thank you. So let's assume
12 hypothetically that the -- actually, let me
13 ask it this way: Would you agree that the
14 R/A tracer survey results -- I'm sorry.
15 Let's do a hypothetical. Let's assume that
16 the R/A tracer survey results were accurate
17 and showed an actual leak, not just a
18 possible one.

19 Do you have that in mind?

20 A Okay.

21 Q And let's say SoCalGas wanted to
22 kill Well SS-25 and stop the actual leak that
23 we had identified in the casing before.

24 Do you recall that?

25 A Yes.

26 Q In that instance, based on your
27 experience as an engineer, I think working
28 for much of your career in natural gas

1 storage, in your opinion, could the well have
2 been killed from the top?

3 A Yes.

4 Q And how do you know that?

5 A Well, that would be a routine kill
6 in a well that the company wanted to do a
7 workover on. We would kill the well in a
8 similar manner for any other well in the
9 field.

10 Q Okay. Let's go to the other
11 exhibit you mention on page 13, lines 2 to 3.
12 You recall mentioning there the noise log
13 from February of 1983?

14 A Yes, I believe there were -- there
15 was one '83 noise log and two '84 noise logs.

16 Q Okay.

17 A Yes, two '83(sic), yes.

18 MR. GRUEN: Your Honor, I can note,
19 too, if you'd like to take a break soon, I
20 think I've got another 10 or 15 minutes of
21 cross and then we can take one if you'd like.

22 ALJ POIRIER: That sounds good.

23 MR. GRUEN: Okay. Thank you.

24 Q So let's open Exhibit SED-266.
25 This is the service order and delivery
26 receipt for a noise log on Well SS-25 dated
27 February 1983.

28 Mr. Neville, do you recognize this

1 as the receipt showing that the February 1983
2 noise log was done?

3 A If you could scroll to the top so I
4 could see the well header and the date.

5 Q Sure.

6 A Okay. I see the well name, SS-25,
7 and I see the date, 2-23-83. So it does
8 appear to be the noise log of 2-23-83.

9 Q On Well SS-25?

10 A Yes.

11 Q Thank you.

12 Mr. Zarchy, you're a step ahead of
13 me. If you could go to the bottom. The
14 Bates number is AC_CPUC_0000582.

15 Based on the Bates number, do you
16 recognize this document as part of the SS-25
17 well file as it existed during the SS-25
18 incident?

19 A I would expect that document to be
20 in the well file, yes.

21 Q Okay. We looked. Having received
22 the document, SED looked for the
23 February 1983 noise log that you referenced
24 on page 13, lines 2 to 3 of your reply, and
25 we see that it's -- well, we couldn't find
26 it.

27 So we wanted to ask, if you can
28 confirm, since it wasn't in your testimony

1 and we didn't receive it, it wasn't actually
2 provided in the supporting exhibits, do you
3 know, can you confirm if in fact the
4 February 1983 noise log that you mentioned in
5 your testimony and you have a receipt for
6 here was actually in the SS-25 well file at
7 the time of the incident?

8 A Could I confirm it. I would
9 look -- I would have to take some time to
10 look through the well file.

11 Q Okay.

12 A Yes.

13 Q Have you seen the February 1983
14 noise log for SS-25 before?

15 A It's been a while since I've looked
16 at the noise logs. I don't recall
17 specifically the '83 logs.

18 Q Okay. I wonder if you could get
19 back to us and let us know if SoCalGas has
20 it. Can we ask you to do that off-line?

21 A Sure.

22 Q Thank you. If we could go back to
23 your supporting attachments, which is Exhibit
24 SoCalGas-16, and go to page 16 with the Bates
25 Number 16.0031. At the bottom of this, this
26 last entry is 8-13-86.

27 Do you see that?

28 A Yes.

1 Q Mr. Neville, I think what confuses
2 me about this is isn't that the last date
3 that's -- of the -- let me --

4 Before I ask, let's go to the top
5 of the document if we could, Mr. Zarchy.

6 That seems to be the last entry for
7 the well activity reports for Well SS-25 that
8 were in this exhibit of your supporting
9 attachments.

10 Do I have that correct?

11 A If you could scroll down to the
12 bottom again.

13 Q Sure.

14 A '86. So what was the question
15 again?

16 Q Was this the last date of the entry
17 for the daily reports that you provided in
18 your exhibit, your supporting exhibit?

19 A Let me double check my exhibit if
20 you don't mind.

21 Q Of course.

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

23 (Off the record.)

24 ALJ POIRIER: We'll be back on the
25 record.

26 Go ahead, Mr. Neville.

27 THE WITNESS: Okay. So I did confirm
28 that the last date is 8-13-86 in my exhibit.

1 BY MR. GRUEN:

2 Q Okay. Thank you. So why didn't
3 SoCalGas or why didn't you, I should say,
4 include the rest of the SS-25 well history
5 entries with this exhibit, Mr. Neville?

6 A I don't know. I'd have to see if
7 they are -- I'd have to check. I think my
8 point was to illustrate the time frame over
9 which the investigation occurred, which was
10 between '83 and '86 -- or '85, I guess. And
11 perhaps that's the reason I didn't include
12 anything further. But I would have to go to
13 the well file to demonstrate there's
14 additional dates in it.

15 Q Okay. Fair enough. Let's turn to
16 Exhibit SED-267, please. This is the note
17 entitled the November 1991 Noise and
18 Temperature Survey. It is for SS-25, I
19 believe, but I'll ask you to confirm,
20 Mr. Neville.

21 If we could scroll down so
22 Mr. Neville could see it. Mr. Zarchy, if you
23 could scroll down to the next page.

24 UNIDENTIFIED SPEAKER: Mr. Gruen, it
25 looks like --

26 (Crosstalk.)

27 BY MR. GRUEN:

28 Q I think I'm tracking what happened.

1 Pardon me. I may have misspoken and said
2 Exhibit 268 when I should have said
3 Exhibit 267. If we could look at SED-267,
4 which is shown on the screen here, and that's
5 shown, pardon me, as SoCalGas Response to SED
6 Data Request 88, Daily Well Activities. With
7 that in mind, if we could scroll down to the
8 bottom of this.

9 The first Bates number is
10 I1906016_SCG_SED_DR_88_0000028. That's the
11 first Bates number, but I'll just ask you if
12 you could, Mr. Neville -- and we can take a
13 look at this if you'd like -- but do you
14 recognize this as the Daily Well Activities
15 Reports continuing through to December 20,
16 1997? We can scroll down so you can see it
17 if you'd like.

18 A Yes, December 20, 1997.

19 Q And just so we show you the whole
20 document to see what the rest of it is, if
21 you could scroll down, Mr. Zarchy.

22 And the reason for showing is we do
23 see that the dates are going backwards, if
24 you will, but this is the way that we
25 received it. So do you see how the dates are
26 continuing backward through the early '80s as
27 we progress down? The pages go -- continue
28 to progress down in dates back through 1980

1 and through the late '70s, if you will, and
2 that continues the last of this sequence,
3 then, is Bates Number
4 I1906016_SCG_SED_DR_88_0000033.

5 With that description, just so
6 you've seen the entirety of the document,
7 Mr. Neville, does that show the Daily Well
8 Activities Report through December 20, 1997?

9 A Yes, it does.

10 Q Let's go to the top of the first
11 page if we could, scrolling back to the top.
12 Thank you. And there, the first entry,
13 11-7-91, the entry there says, "ran noise
14 log, almost no noise greater than 2 mV, spike
15 at 7,450 feet, okay."

16 Do you see where I am?

17 A Yes.

18 Q And so SoCalGas observed noise on
19 Well SS-25 at 7,450 feet on November 7, 1991;
20 correct?

21 A It shows that at least the activity
22 report here just says there was a spike at
23 7,450.

24 Q Okay. Does that mean that SoCalGas
25 ran a noise survey on that date in order to
26 come up with that determination?

27 A Yes, it would. Yes.

28 Q Okay. So but the entry does not

1 show whether SoCalGas ran a temperature
2 survey on November 7, 1991; correct?

3 A It doesn't show that, but standard
4 noise logs have temperature surveys run with
5 them. But you're right. It doesn't say a
6 temperature survey.

7 Q You read my next question and I
8 appreciate that. Would you expect that
9 SoCalGas did also run a temperature survey on
10 November 7, 1991?

11 A Based on my experience with noise
12 logs, a temperature tool and a noise tool are
13 run at the same time on the same run. So I
14 could be surprised, but I can't -- I'd just
15 go back to my experience with seeing noise
16 logs. There's usually a temperature survey
17 along with it.

18 Q Okay. Thank you.

19 Your Honor, with that, that's the
20 end of this line if you'd like to take a
21 break.

22 ALJ POIRIER: Yes. Let's take a break
23 for 14 minutes until 11:25. We'll be off the
24 record.

25 (Off the record.)

26 ALJ POIRIER: We will be back on the
27 record. We are returning from a short
28 morning break and we will be continuing with

1 cross of Mr. Neville by Mr. Gruen from SED.

2 MR. GRUEN: Thank you, your Honor. I'm
3 sorry to talk over.

4 Q Let's go to Exhibit SED-268,
5 please.

6 MR. ZARCHY: This is Daniel Zarchy with
7 SED. Can IT please make me the presenter
8 again?

9 ALJ POIRIER: Can we give the presenter
10 ball to Mr. Zarchy. Thank you.

11 UNIDENTIFIED SPEAKER: He should be
12 able to be presenter right now.

13 MR. ZARCHY: This is Daniel Zarchy.
14 I'm sorry, I'm just having a little bit of
15 connectivity --

16 ALJ POIRIER: Let's go off the record.
17 (Off the record.)

18 ALJ POIRIER: We'll be back on the
19 record.

20 Please continue, Mr. Gruen.

21 MR. GRUEN: Thank you, your Honor.

22 Q And to read the cover page of
23 Exhibit SED-268, November 1991 Noise and
24 Temperature Survey.

25 Mr. Neville, we'll go through the
26 same exercise. I'll ask you if you recognize
27 this document as described in the cover page
28 as we've been doing. Before I do that, if we

1 could just go to the Bates number at the
2 bottom of the document.

3 If you're available to scroll down,
4 Mr. Zarchy. Thank you. So this is exhibit
5 with Bates Number AC_CPUC_SED_DR_30_0001171.
6 We'll give you a chance to --

7 If we could scroll briefly from the
8 top to the bottom, Mr. Zarchy, so Mr. Neville
9 can see it. Scrolling down slowly.

10 With this in mind as you are
11 reviewing, Mr. Neville, I'll ask if you could
12 confirm that you recognize this as the
13 November 19th -- November 7, 1991, Noise and
14 Temperature Survey of Well Standard Sesnon
15 25?

16 A Yes.

17 Q Okay. Do you want to see the rest
18 of the pages on it or are you confident that
19 it's as you've confirmed?

20 A I'm confident. I saw the header
21 and that's the main --

22 Q Okay. Fair enough. So before the
23 break, we were looking at the entry from
24 November 7, 1991, from the daily reports.

25 Do you recall?

26 A Yes.

27 Q And you recall you didn't see entry
28 of a temperature survey there; is that right?

1 A Right, yes.

2 Q But this is the temperature survey
3 that was from November 7, 1991, that was
4 omitted from the daily reports log; is that
5 right?

6 A Yes, the track on the right would
7 be the temperature survey.

8 Q Okay. Why wasn't the temperature
9 survey as shown in the track on the right
10 there shown on the well activity report that
11 we just reviewed?

12 A Oh, it's hard to say. I think
13 sometimes we just -- when we say noise log,
14 we just know that it's going to include a
15 temperature survey.

16 Q Okay. Are there other examples of
17 SS-25 well activity reports lacking
18 information from noise and temperature
19 surveys that were done on that well?

20 A Lacking information? You mean on
21 the daily activities report?

22 Q Yes.

23 A Yeah, I -- there could have been
24 other short -- what am I trying to say -- a
25 noise temperature survey. I think somebody
26 just said noise log to shorten the entry.
27 But it's, as I mentioned before, pretty
28 standard to run both.

1 Q Okay.

2 So if we scroll to the top,
3 Mr. Zarchy, if you would, this one says in
4 the "Reason for Survey" box, "Check for
5 potential leakage past shoe as high as
6 8,150 feet"; correct?

7 A Correct.

8 Q So it's looking for leakage below
9 that depth is what I'm understanding.

10 Would you agree?

11 A Yes, I would agree.

12 Q If we scroll down onto the graph,
13 and let's stop at approximately 7,500 feet in
14 depth and maybe center that if we can.
15 Great. So at approximately 7,500 feet, we
16 see the notations, "hear bubbling, hear clean
17 gas noise, hear slight bubbling."

18 Do you see that?

19 A Yes.

20 Q Okay. I wanted to focus on this
21 because it's shallower than the depth that
22 was identified at the top that we had just
23 said. They were checking, it seems, for
24 leaks lower than this depth, but the notation
25 appears to be at a high depth.

26 Would you agree?

27 A Yes.

28 Q And that's confirmed by the crooked

1 lines and the anomaly shown approximately at
2 around the 7,500-foot depth; correct?

3 A Yes.

4 Q What do the words "hear bubbling,
5 hear clean gas noise, hear slight bubbling"
6 mean to you when they're shown at this depth?

7 A So what is available to the crew
8 that runs this survey is there's actually a
9 microphone, a headphone, so that on a noise
10 anomaly such as this, the crew and the
11 engineer can put on a headphone and actually
12 listen to the noise. Instead of just looking
13 at the four curves, they can actually hear
14 the noise.

15 And so I suspect that when the
16 terminology that is here, it says, "hear
17 bubbling, hear clean gas noise, hear slight
18 bubbling," that that's what I would expect
19 based on my experience in the field.]

20 Q Okay. And -- and do you recall,
21 when you were looking at the daily activity
22 report entry for -- for November 7th, 1991,
23 that the notation talked about a spike?
24 So -- and -- and the notation was on well
25 SS-25 at approx- -- excuse me, at 7450 feet.
26 Do you recall that notation?

27 A Was the spike -- there's another
28 spike above that. I just want to make sure

1 they're not referring to that spike.

2 Q I --

3 A If we could scroll back to the
4 remarks.

5 Q Yes, of course.

6 Can we go to -- to the remarks?

7 A Now I'm not seeing the spike.

8 Q Okay. So I think you may be
9 referring to the spike that was on the daily
10 activity reports that we were referring to in
11 the prior exhibit. Is that right?

12 A That's right.

13 Q Okay. So if we go back to -- I'm
14 sorry. It should be Exhibit SED-267, and
15 there, we see the entry of 11-7-91, and it
16 says there "Ran noise log. Almost no noise
17 greater than 2 MB, spike at 7450 feet." Do
18 you see that?

19 A Yes.

20 Q So if we go back, then, to SED --
21 Exhibit SED-268, where we were, and we scroll
22 down to 7450 feet -- and stop there. Great.

23 So the "hear bubbling, hear clean
24 gas noise" and "hear slight bubbling" as
25 shown at approximately 7450 feet, does that
26 match up with the spike that's identified at
27 7450 feet from November 7th, 1991, as shown
28 on the daily activity report, Mr. Neville?

1 A Yes, it does.

2 Q Okay. Under normal conditions,
3 does this indicate a probable leak on well
4 SS-25 at this approximate depth on
5 November 7th, 1991?

6 A I would -- I would say that, again,
7 one has to look at -- at all of the data
8 available. I -- I -- for example, I see the
9 temperature survey. I don't see a cooling
10 across the noise spike, so that would, in and
11 of itself, tell me that there's not a leak in
12 the casing at that point. I also notice that
13 there's a repeat of the -- of -- of a section
14 between, it looks like, 7200 and 7600, and
15 there's no spike. So it's -- it's obvious
16 that the crew was investigating that spike at
17 7450, but, as noted in the activities report,
18 concluded that the survey was okay. That may
19 have been too -- more than what you asked me,
20 but I think the short answer is it doesn't
21 necessarily indicate a leak at that point.

22 Q Can you rule out that there was a
23 leak, based on this information?

24 A I can rule out that there's --
25 there -- there was not a leak at 7450.

26 Q I want to be sure I understand that
27 in positive terms.

28 You can -- can -- can you say --

1 maybe restate that positively?

2 A Yes.

3 Q You can rule out that there was a
4 leak?

5 A There was --

6 Q You can -- how about this? I'm
7 sorry. Let me -- let me try one more time.

8 You're -- you're saying you can
9 confirm that there was not a leak at 7450
10 feet on well SS-25 on November 7th, 1991. Is
11 that your testimony?

12 A Yes.

13 Q And how can you do that?

14 A The temperature survey shows no
15 zigzag, is -- or pinpoint cooling there that
16 would exist if there were a leak at 7450 in
17 the production casing. The other -- the
18 other eye -- item here is that, if there were
19 a leak at 7450, I would expect all of the
20 four tracks of the noise log would all move,
21 and the one furthest to the left doesn't move
22 at all.

23 Q My eyesight isn't what it once was,
24 but I'm going to try and track you on that.

25 So the -- the one that's furthest
26 to the left at approximately 7550 feet, does
27 it jag slightly to the right?

28 A The one at -- the furthest to the

1 left, at 7450, which is the peak of -- of the
2 line on the fourth line peak, there's no
3 movement there, and we typically relate that
4 first line to -- to gas movement,
5 specifically. It's supposed to pick up the
6 frequency of gas movement through a --
7 through a small hole.

8 Q I -- I -- I may have confused
9 things. I'm seeing two sets of four lines on
10 this part of the -- the graph, as well as the
11 dark -- a dark diagonal line. So if I -- am
12 I tracking that right? Is that -- is that
13 how that looks to you?

14 A Yes.

15 Q And which of the four -- the sets
16 of four lines are you talking about, the one
17 on left or the one on the right on this
18 chart?

19 A Okay. So the one on the left is
20 the full log, top to bottom, and -- and
21 that's the one I'm referring to. That
22 particular set of four lines constituted the
23 first pass at the noise log.

24 Q Uh-huh. Okay.

25 A And I --

26 Q And -- go ahead. I'm sorry. Sorry
27 to --

28 A Yeah. And I -- I was going to go

1 on to say that, due to the anomaly of the
2 noise log, it was repeated over that section,
3 and that is the second set of noise
4 responses. And, in addition --

5 Q Okay.

6 A In addition to that, it looks like
7 there were -- the microphone was used to
8 actually listen to that point that represents
9 the spike at 7450.

10 Q And the other frequencies are all
11 crooked for both sets of four lines. So
12 those were picking up some noise, including
13 the spike. Is that -- is that what I'm -- am
14 I understanding that correctly?

15 A The magnitude is not very high, so
16 I would say that -- that there's -- you know,
17 there's -- that that's not -- that is
18 indicative of -- of a -- of no leak, those --
19 those four lines on the repeat.

20 Q Okay. But, they are picking up
21 noise?

22 A They're picking up -- you know,
23 they obviously heard some bubbling, and they
24 heard some gas -- clean gas noise. And I
25 think in the header, they even talk about
26 potential noise from an -- from a nearby
27 well. So whether or not it was that noise,
28 was from a nearby well, it's -- it's -- it's

1 hard to say. But, that -- there was some
2 comments that a nearby well -- if we could go
3 back up to the header.

4 Q Sure. The header of this document.
5 Right?

6 A Yes.

7 Q Just -- okay.

8 Mr. Zarchy, if you would.

9 A So I guess that's what I -- those
10 comments in -- in the -- in the remarks
11 section for distance noise above 1200 feet,
12 at 500 feet, bled casing, killed line on well
13 S-25-A, and heard even higher noise, it's
14 hard to say if that's related to the 7410.
15 It -- as I read it again, it doesn't appear
16 to be; but, it's -- it's hard to -- it's hard
17 to -- to be sure, at this point.

18 Q Okay. I just want to be sure
19 you're complete with your answer. It looks
20 like you're still thinking.

21 A I'm -- no, I'm finished. I wanted
22 to see the remarks to see if there were any
23 special remarks that addressed the 7410 or
24 7450 leak, and I -- I guess I don't see
25 anything specific there.

26 Q Understood. Okay. Let's turn to
27 another exhibit.

28 ALJ POIRIER: Mr. Gruen, I'm sorry to

1 interrupt. I just want to define something
2 for the record that's going to help us.

3 MR. GRUEN: Yes.

4 ALJ POIRIER: Mr. Neville, can you just
5 briefly define what clean class -- clean gas
6 noise is?

7 THE WITNESS: Clean gas noise would
8 be -- it's hard to say. It's -- it's -- it's
9 familiar to me, because I've heard it. It's
10 hard to -- clean gas noise wouldn't have any
11 liquid in it. It wouldn't have any pulsing.
12 It would be kind of a -- at a higher
13 frequency than -- than, say, a well -- or,
14 you know, a leak would leak or a -- or a
15 combination of liquid and gas. It's -- it's
16 a high frequency, you know, like maybe
17 bleeding off tire pressure, you know, if
18 anyone's done that. It's -- it's -- it's
19 more in line with -- with -- that's probably
20 the closest analogy I could come up with
21 right now.

22 ALJ POIRIER: Okay. That's fine.

23 THE WITNESS: Yeah.

24 ALJ POIRIER: Thank you.

25 Mr. Gruen, please continue.

26 MR. GRUEN: I'm sorry. I see I was on
27 mute. Yes, your Honor.

28 If we could turn to Exhibit SED-269.

1 And for the record, just reading this, it's
2 the June 12th -- I'm sorry, the June 2012
3 audio detection survey. And if we could
4 scroll down, and I'll ask if you could -- are
5 we able to rotate that so we're seeing the --
6 the --

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

8 (Off the record.)

9 ALJ POIRIER: We will be back on the
10 record.

11 MR. GRUEN: Thank you.

12 And if we go to the Bates number
13 again, for the record, I believe that's at
14 the bottom here. I may have -- can you
15 scroll down, Mr. Zarchy?

16 Oh, no. I -- I apologize, your
17 Honor.

18 Just to orient it, yeah, I think
19 it's going to be to the right, far to the
20 right, and if you could scroll up slightly.

21 So let's see if I can read it
22 sideways. The -- the Bates number is
23 AC_CPUC_0000186, I believe.

24 Q Does that look right to you, just
25 to be sure I'm reading correctly,
26 Mr. Neville? Can you confirm I have that
27 right? Are you able to tell?

28 A Tell the -- the Bates number or

1 tell that it's -- sorry.

2 Q The Bates -- the Bates number, in
3 this case.

4 A Oh, yeah. Okay. It's on the side
5 of 186. Yes.

6 Q Helpful to have a second set of
7 eyes. Thank you. And then we'll ask the
8 question.

9 Can you confirm that this is the
10 right document?

11 Let's go back to the left-hand
12 side, Mr. Zarchy.

13 And if you could confirm that this
14 is the audio detection survey as identified
15 for SS-25; and I believe the date is
16 June 1st, 2012, when it was ran.

17 Does that look -- is that -- can
18 you confirm that's accurate, Mr. Neville?

19 A Yes, that's accurate.

20 Q And do you recognize this as the
21 audio detection survey from that date?

22 A Yes.

23 Q On well SS-25. Right?

24 A Yes.

25 MR. GRUEN: Okay. All right. If we
26 can reorient, so we can look at the graph.
27 Great. And if we scroll down all the way to
28 the graph, I believe, to approximately where

1 the numbering -- we're going to go -- want to
2 go toward the bottom. The numbering is
3 approximately 8200 to 8500 at the bottom.
4 Great. Thank you.

5 Q And this is describing the -- the
6 numbers are -- and they're showing feet down
7 from the surface of the well. Is that right?

8 A Yes.

9 Q Okay. So from 8200 to 8500 feet,
10 approximately, the -- this is a -- we're
11 looking at a differential temperature line
12 now. And I think it's in blue. Is that
13 right?

14 A Yes, that would -- that would be a
15 differential temperature.

16 Q Okay. And so at that depth, that
17 depth range, the differential temperature
18 line begins to become erratic. Would you
19 agree?

20 A Yes. And could you repeat the
21 depth again, just --

22 Q Sure. Approximately, by my
23 estimate, 8200 to 8500 feet in depth.

24 A Right. I -- I would say it starts
25 to trend to -- to the left, showing more
26 differential.

27 Q Okay. And it starts to trend to
28 the left, showing more differential.

1 And under normal conditions,
2 without the -- let me ask it this way: Does
3 that temperature differential indicate a
4 probable or possible leak on well SS-25
5 between 8200 and 8500 feet on June 1st, 2012?

6 A Well, it's a temperature anomaly,
7 and it's anomaly because there's a -- a
8 deviation from the -- the normal gradient.
9 It deviates from normal gradient a little
10 higher than -- than the storage zone. So it
11 would be characterized as an anomaly.

12 Q Okay. And do -- just to be sure
13 I'm getting an answer to the question, does
14 that indicate a probable or possible leak on
15 well SS-25 at that depth at this time, the
16 time we're -- this -- this document was
17 noted?

18 A I don't think I would go to that
19 extent yet. I think the temperature
20 anomalies are so common, and they're so --
21 they're so, in a majority of cases, not
22 related to any leak. So temperature
23 anomalies are common. I don't -- I wouldn't
24 say that's a possible leak at this point.

25 Q Okay. So when you were looking
26 back at the 1991 survey that we covered at
27 some length, in the last line, the -- it
28 showed that the noise was observed between

1 8200 and 8600 feet on November 7th, 1991.

2 Did I have that right?

3 A Yes. 8200 to --

4 Q To 8600.

5 A I thought that it was 8400 to 8600,
6 was the noise.

7 Q Okay. So roughly speaking, then,
8 do -- would you agree that approximately
9 the -- the 1991 noise survey showed the same
10 approximate depths where the noise was
11 observed, as is shown -- the temperature
12 differential is shown in this document from
13 2012?

14 A You're asking me if the noise
15 response from the 1984 survey --

16 Q Let me restate.

17 A Okay.

18 Q I'm -- the -- the basic question
19 is: I'm trying to gather if the lines match
20 up, the depths match up, from 1991 to 2012.
21 So in this case, the 2012 document shows a
22 temper -- temperature differential of -- from
23 approximately 8000 -- 8200 to 8400 feet, and
24 then I -- I'm observing that, in 1991, with
25 your clarification, we observed noise there
26 of approximately 8400 to 8600 feet.

27 So do those depths that show the
28 noise and hear the temperature differential

1 match up, approximately?

2 A Well, I -- I -- I would say that --
3 let's see. The -- the -- the peak
4 temperature cooling is about 8500, and so if
5 you're talking about the differential, the
6 differential appears to line up in the 8400
7 to 8600 range. The peak temperature cooling
8 is at approximately 8500, and that's
9 approximately the top of the storage zone.
10 So that's what I would expect.

11 Q Okay. I appreciate that. Let me
12 just clarify so that we're -- we're -- for
13 the record, you mentioned storage zone, and
14 I've been meaning to ask a couple questions
15 about that.

16 Could you clarify, for the record,
17 on this graph where exactly the storage zone
18 is, just if you could orient us?

19 A Yeah. So the --

20 Q The -- the depth of the storage
21 zone, exactly.

22 A The storage zone is -- is
23 considered the -- the S4. That's the part
24 that is labeled -- there's a number next to
25 it that I can't read, but I can see that
26 there's -- the S4 is designated on that far
27 left track.

28 Q Do you want us to enlarge it?

1 A Yeah, if you could; if you could
2 enlarge that area next to the --

3 Q Sure.

4 Go ahead, Mr. Zarchy. Let's follow
5 him.

6 Where do you want us to go,
7 Mr. Neville?

8 A Right there. That's good. I --
9 I'm reading -- do you see the word "S" -- the
10 number -- or S4, and it looks like 8487?

11 Q Okay. Just to enlarge it
12 further --

13 A Okay.

14 Q So S4 is 8487?

15 A Yes. Right. That is -- that would
16 be considered the top of the storage zone.

17 Q Okay. And here, this doesn't show
18 the bottom of it. Is that right?

19 A Right.

20 Q And you don't know the bottom of
21 it?

22 A I don't -- I actually don't know
23 the bottom.

24 Q Okay. And I see, while we're here,
25 it looks like -- is S1 indicative of the S1
26 storage zone?

27 A Yes.

28 Q Okay. And the S1 storage zone, I

1 think approximately what you had said
2 earlier, it seems to be at a depth of
3 8394 feet, perhaps. Does that look right?

4 A Right. It looks like -- yes.

5 Q That's my approximate recollection
6 of what you said earlier; maybe a foot or
7 two, give or take.

8 But, do you know -- I think you had
9 mentioned that the S1 storage zone is
10 approximately five feet in -- in depth. Is
11 that right?

12 A Yeah, I could -- I could say that,
13 yes.

14 Q So -- okay. So we're going to
15 approximately 8400 feet, in that case, is the
16 bottom of the S1. So --

17 A That would be correct. That would
18 be a number that I could check, but it --
19 it's approximately five.

20 Q Approximately. Okay. And while
21 we're here, where -- at what approximate
22 depth is the shoe of the well?

23 A The casing shoe of this well is --
24 is below what is shown. You'll have to
25 scroll down.

26 Q Okay.

27 Please follow him again,
28 Mr. Zarchy.

1 A Okay. So the casing shoe -- I can
2 see it graphically illustrated there. I
3 don't see a depth notation. But, it's
4 approximately -- it's -- and we're talking
5 about the seven-inch production casing shoe.
6 I don't see a depth location on there, but
7 you could see it relative to the S4 and the
8 S8. It's -- it's shown -- if you look at the
9 schematic track, it's -- it's the -- right at
10 the point where there's a WSO noted at --
11 would be 8583. But, I -- I can look at my
12 testimony to find the casing shoe.

13 Q Okay. Do you -- perhaps you can
14 share with us, what's your understanding of
15 the approximate depth of the casing shoe?

16 A Approximate -- looking at this
17 diagram, it looks like it's a little deeper
18 than the water shutoff holes. It looks like
19 it's going to be somewhere around 85, 90, or
20 so.

21 Q Okay. Do you want to -- I -- I
22 notice you're looking at something. Do you
23 want to take a moment to confirm that?

24 A Yes, please, if I -- if I could.

25 Q Sure.

26 ALJ POIRIER: Go off the record.

27 (Off the record.)

28 ALJ POIRIER: We'll be back on the

1 record.

2 Go ahead, Mr. Neville.

3 THE WITNESS: So, after reviewing
4 opening testimony, I have the casing shoe
5 depth at 8585.

6 BY MR. GRUEN:

7 Q Okay. Thank you.

8 Okay. And let's go to -- if we can
9 enlarge, zoom back out, if you could,
10 Mr. Zarchy, and if we go to a depth of --
11 scroll up to a depth where the number shows
12 about 500, and if you could center that.
13 Keep going. Yeah. Oh, I see. Okay.

14 Mr. Neville, does this 2012 survey
15 show temperature cooling at approximately
16 500 feet, as shown by that differential, the
17 temperature differential line at that depth?]

18 A Yes, it does.

19 Q How do you explain that?

20 A It's typical in many wells that a
21 temperature gradient doesn't manifest until
22 you get deep enough in the well. There's
23 surface issues that could result in
24 temperature changes in the top several
25 hundred feet of the well.

26 MR. GRUEN: Okay. Let's turn -- I --
27 your Honor, I think we could -- with 10
28 minutes or so, we could squeeze in one more

1 line of questioning here.

2 Q So, Mr. Neville, if we could go
3 back to Exhibit SED-267, and here we see the
4 daily well activities records for SS-25
5 from -- that's dated 1997, and I believe it
6 goes up through December 20th of 1997. If we
7 could scroll down, we could see that -- to
8 the bottom of the page. Okay.

9 So you see the entry of December
10 20th, 1997?

11 A Yes.

12 Q Okay. And that's the last date --
13 that's the last date entry on this document;
14 is that right?

15 A Yes. It appears to be the case,
16 yes.

17 Q Okay. Mr. Neville, did SoCalGas
18 keep daily well activities records between
19 December 21st, 1997 and October 22nd, 2015?

20 A My recollection is in the mid to
21 late 1990s, around 1997, we stopped that
22 practice of using the daily activities, of
23 maintaining this particular report.

24 Q Okay. So after this entry on
25 December 20th, 1997, until the incident,
26 SoCalGas stopped keeping daily well
27 activities records on Well SS-25?

28 Am I tracking that correctly?

1 A Well, we kept the records, but we
2 didn't keep this report of the activities.
3 You know, I don't know if I would call this a
4 record. This is a -- kind of an activity
5 report of records.

6 Q And I appreciate the clarification.
7 Let me see if I can re-ask it and get it
8 right. So the daily activity report of
9 records, as you called it -- did SoCalGas
10 stop keeping the daily activity report of
11 records on Well SS-25 on December 21st, 1997?

12 A It -- I don't know the exact date
13 that that was stopped. It could be different
14 for different wells but around that time
15 frame.

16 Q Understood. Thank you. And when
17 you say -- just a clarification. When you
18 say "relying on records" -- so once SoCalGas
19 stopped keeping the daily -- the daily
20 activities report -- the records that
21 SoCalGas was relying on were things like
22 temperature surveys, noise logs, R/A tracer
23 surveys; is that right?

24 A Right. I can use an example, if
25 you want.

26 Q Please. Go ahead.

27 A So, for example, on 9/24/96, the
28 activity listed there is "ran temperature

1 survey." It says "okay" and gives the tubing
2 pressure, the casing pressure, the pickup
3 point in the inventory. That information
4 would be on the temperature survey record
5 itself instead of listed as the activity in
6 the activity report.

7 Q I see. Okay. Your Honor, with --
8 I'm sorry. Mr. Neville, I just want to be
9 sure -- I see you're still looking. So I
10 want to be sure you completed your answer.

11 A Yes, I have.

12 MR. GRUEN: Okay. Thank you. Your
13 Honor, this completes this line. Would this
14 be a good time to stop for lunch?

15 ALJ POIRIER: Yeah. Let's go ahead and
16 do that. Let's break until 11:00 -- or 1:25
17 we'll be back.

18 And we'll be off the record.

19 (Whereupon, at the hour of 12:12
20 p.m., a recess was taken until 1:25
21 p.m.)]

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AFTERNOON SESSION - 1:25 P.M.

* * * * *

DAN NEVILLE

resumed the stand and testified further as follows:

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

All right. We are coming back from our lunch break on Tuesday, the 4th of May, and we are going to continue with cross-examination of Witness Neville.

You may go ahead, Mr. Gruen.

MR. GRUEN: Thank you, your Honor.

CROSS-EXAMINATION RESUMED

BY MR. GRUEN:

Q Good afternoon, Mr. Neville. Mr. Neville, I wanted to ask some questions that just briefly get at the conditions under which SoCalGas handles leaks at different depths along the casing of the well. So with that in mind, let me first ask you, under what conditions would SoCalGas investigate the shallower casing leaks on a well above the packer?

A (Speaker on mute.)

UNIDENTIFIED SPEAKER: Mr. Neville,

1 you're on mute.

2 THE WITNESS: Okay. Thank you. So you
3 mentioned shallow casing leaks above the
4 packer. Just for clarification, the packer
5 itself is deep. It's down at the zone. So
6 when you say "shallower leaks," what kind of
7 shallow are you --

8 BY MR. GRUEN:

9 Q Yeah. I appreciate -- I'm sorry to
10 talk -- go ahead. What was the rest of your
11 clarification? I may have missed it.

12 A Yeah. I guess the question would
13 be when you ask about shallower leaks, how
14 shallow are you talking -- talking about?

15 Q Okay. Anything above the packer.
16 So let me re-ask the question with that
17 clarification in mind.

18 Under what conditions would
19 SoCalGas investigate casing leaks above the
20 packer of wells at Aliso Canyon?

21 A I would say in every case there's
22 a -- there's activity that involves the
23 investigation of a leak.

24 Q Okay. And same question in mind.
25 These questions -- or this next question is
26 also asking about leaks that are found above
27 the packer of Aliso Canyon wells. So under
28 what conditions would SoCalGas not fix casing

1 leaks that are found above the packer?

2 A I'm sorry. I must -- I may have
3 misinterpreted your first question. Was your
4 first question about leaks above the packer?

5 Q Yes, it was.

6 A Okay. So my answer is the same.
7 It would investigate all of those. So sorry.
8 Not go to the second one. I just had to
9 reconfirm.

10 Q Sure. Under what conditions would
11 SoCalGas not fix casing leaks above the
12 packer at Aliso Canyon wells?

13 A The company -- SoCalGas would fix
14 all leaks above the packer.

15 Q Okay. And what is the difference
16 between a casing leak above the packer and a
17 shoe leak?

18 A A shoe leak will most definitely
19 originate below the packer and at the shoe of
20 the casing. The difference is that it
21 involves the movement -- or the leakage of
22 gas on the outside of the production casing
23 through the cement.

24 Q Okay. Thank you. Okay. So with
25 that, if we go to your witness qualifications
26 on your reply testimony, which I believe is
27 SoCalGas -- Exhibit SoCalGas-15. And Mr.
28 Zarchy, if we pull that up and go to page 20,

1 lines 17 through 18. And that's Bates
2 No. SoCalGas 15.0021. And lines 17 through
3 18, you state:

4 Beginning in November 2015, I also
5 began providing assistance
6 concerning various tasks related
7 to the October 23rd, 2015 leak at
8 SS-25.

9 So I wanted -- with that in mind, you know
10 where I am in your testimony?

11 A Yes.

12 Q Okay. So let me ask you about --
13 some questions about a suspected hole near
14 the top of the SS-25 casing in 2012, and with
15 that, if I could introduce Exhibit SED-274.
16 This is entitled Estimated Well Conditions
17 (as of 11-10-2015). I think it is a 2012
18 document, though, but I'll ask you to confirm
19 and see if you recognize this such, Mr.
20 Neville.

21 If we could go down to the -- the
22 Bates number there is
23 AC_CPUC_SED_DR_17_0046340. And let me just
24 ask you, having -- if we scroll up slightly,
25 just to give you a chance, do you recognize
26 this document, Mr. Neville?

27 A I recognize the document -- the
28 typewritten part of the document, which is

1 the wellbore schematic of SS-25.

2 Q Okay. And the handwriting is not
3 familiar to you?

4 A The handwriting is not familiar to
5 me.

6 Q Okay. So do you know if SoCalGas
7 provided the document as shown in response to
8 Data Request 17?

9 A Yeah. I have no idea.

10 MR. GRUEN: Your Honor, if I may, could
11 we ask counsel to stipulate that this
12 document that is shown can go into the record
13 as part of SoCalGas response to SED Data
14 Request 17?

15 ALJ HECHT: I just want to be clear.
16 So SED received this as part of the response
17 to SED-17; is that correct?

18 MR. GRUEN: That's my understanding,
19 your Honor, yes.

20 ALJ HECHT: Okay. Then I will ask Mr.
21 Lotterman for SoCalGas whether they have any
22 concerns about that.

23 MR. LOTTERMAN: I guess, your Honor, I
24 would have to see what the data requested was
25 responding to and also understand what Mr.
26 Gruen wishes to stipulate to.

27 ALJ HECHT: Honestly, I agree with
28 that. I am not too comfortable putting it in

1 without knowing its origin and some context
2 for it. If you can provide the full data
3 request and response, as I think you've done
4 in some other cases, that may be helpful or
5 feeling that maybe we should discuss this
6 when there's a little bit more information.
7 I'm concerned about the fact that it has
8 writing on it that the witness does not
9 recognize.

10 MR. GRUEN: I appreciate that, your
11 Honor. If we could scroll to the bottom. I
12 just want to confirm -- I think that the -- I
13 think I have the data response correct. So
14 that Bates number should be checkable to be
15 sure that I'm correct and that the document
16 has been provided as -- in the fashion we've
17 shown here. And this should be checkable by
18 SoCalGas to confirm. That's one option.

19 I wonder if that might be doable for
20 SoCalGas to check and see if, in fact, it's
21 been provided in this -- the former showing.

22 ALJ HECHT: I'm going to read that
23 Bates number for the court reporter. That is
24 AC_CPUC_SED_DR_17_0046340. That may have
25 been overkill, but I want us to be able to
26 find our way back if we need to.

27 (Interruption by reporter.)

28 ALJ HECHT: Thank you. I'm sorry for

1 any unclarity there. I am going to suggest
2 that I would like to be able to see what this
3 is responding to and what the context is and
4 know a little bit more about it. Is there
5 any possibility that you can do something
6 else now, and you guys can address that
7 offline?

8 MR. GRUEN: Absolutely, your Honor.
9 We'd be happy to move to another line and
10 clear that up later. Yeah.

11 ALJ HECHT: Okay.

12 MR. GRUEN: No problem. If you'll bear
13 with me a moment, I'll note that, and I
14 believe my colleagues will as well.

15 ALJ HECHT: Yeah, I --

16 MR. GRUEN: Okay.

17 ALJ HECHT: I was actually still
18 writing down that Bates number for my own
19 reference so --

20 MR. GRUEN: Oh. We'll wait until
21 you're ready, your Honor.

22 ALJ HECHT: Okay. It looks like we
23 have a question or comment from Ms. Bone.

24 MS. BONE: Yes. If someone could just
25 repeat which SED data exhibit this is.
26 Sorry.

27 MR. GRUEN: I can do that. This is
28 Exhibit SED-274.

1 MS. BONE: 74. Thank you.

2 MR. GRUEN: And it should be part of
3 data -- the response to Data Request 17, as
4 indicated by DR 17 in the Bates number.

5 Okay. Maybe what we can do is at least --
6 okay. We'll move along.

7 Q So the -- if we could turn to
8 Exhibit SED-275, please. And this one is
9 History of Oil or Gas Well SS-25, 2/26/2016.
10 And if we could scroll down to the bottom.
11 Bates number there is AC_CPUC_0008807. And
12 if you'd scroll to the top.

13 Mr. Neville, do you recognize this
14 document as part of the set of documents in
15 response to SED's Data Request No. 1?

16 A I don't recognize the document as
17 part of a data request. I don't know that to
18 be the case, that it is part of a data
19 request.

20 Q Let me ask it more generally. Do
21 you recognize the document?

22 A I recognize this type of document,
23 History of Oil Or Gas Well document. I don't
24 ever recall seeing this document.

25 Q Okay. Okay. So you don't know if
26 this document was a document that was
27 prepared by Southern California Gas Company?

28 A I don't know.

1 Q Okay.

2 A Yes, I don't know.

3 MR. GRUEN: Okay. And your Honor, I
4 think we're at the same point here. If --
5 could we get clarification on the -- from
6 SoCalGas if, in fact, it did provide this as
7 their response to SED Data Request 1 for
8 purposes of laying foundation? We could
9 also -- if SoCalGas wants to stipulate that
10 it goes into the record, that's adequate as
11 well. But wondering how to lay foundation at
12 this point.

13 ALJ HECHT: Yes, I understand.

14 Mr. Lotterman, do you have any
15 thoughts?

16 MR. LOTTERMAN: I think for sake of
17 clarity, your Honor, it would be helpful to
18 understand the foundation of the document
19 before we decide its use or usefulness. So
20 we will put this on the list as well.

21 ALJ HECHT: I think that's fine. We
22 should also put this on the list. I am a
23 little less concerned about this one because
24 it doesn't have handwriting on it, and the
25 witness does recognize the type of document.
26 But again, without knowing the context, I
27 wouldn't want to move forward too far.

28 MR. GRUEN: Understood, your Honor. I

1 can turn to another one.

2 (Interruption by reporter.)

3 MR. GRUEN: Loud and clear on those
4 counts. And I'll mute my phone slightly. I
5 wonder if that's any better. And I will
6 certainly do my best to stop talking over
7 people to my best effort. Let me try that.

8 So if SoCalGas could clarify with us
9 by day's end so that we can move forward with
10 this cross, if it's doable, if we have the
11 foundation by end of day, and then we'll
12 prepare cross tomorrow. I wonder if that
13 would be a reasonable approach.

14 ALJ HECHT: I would like that.

15 Mr. Lotterman, will that work?

16 MR. LOTTERMAN: I believe it will, your
17 Honor.

18 ALJ HECHT: Great. We do have a couple
19 more days scheduled with this witness. So I
20 know that it disrupts your order but
21 hopefully not your flow very much.

22 MR. GRUEN: Thank you, your Honor.
23 We'll make it work. Understood. I
24 appreciate the cooperation.

25 Q Okay. So let's turn to your
26 opening testimony, Exhibit SoCalGas-1.

27 ALJ HECHT: And at this point, I'll go
28 off the record.

1 (Off the record.)

2 ALJ HECHT: We'll be back on the
3 record.

4 We just went off the record to find
5 a location in testimony. So please go ahead.

6 MR. GRUEN: Thank you, your Honor.

7 Q Okay. If we turn to your opening
8 testimony -- and we have that up on the
9 screen share -- with Bates No. SoCalGas --
10 the page with Bates No. SoCalGas 1.0002. And
11 starting at line 29 and continuing on to line
12 32, you say:

13 The tubing packer completion
14 provides two primary benefits:
15 One, a means to mechanically
16 isolate the well from the storage
17 zone through the use of a wireline
18 set downhole plug and, two, a
19 means to hydraulically isolate the
20 well from the storage zone by
21 providing a conduit for kill
22 fluid.

23 Did I read that correctly?

24 A Yes.

25 Q Okay. Was SS -- was Well SS-25
26 designed with a tubing packer completion?

27 A Yes.

28 Q And according to your statement in

1 testimony there, SS-25 -- Well SS-25 was
2 designed so that it could be killed by
3 pumping kill fluid through the tubing; is
4 that correct?

5 A Yes.

6 Q Did SoCalGas try killing Well SS-25
7 by pumping kill fluid through the tubing?

8 A Prior to the incident, I assume
9 you're asking?

10 Q No. I mean during the incident.

11 A Oh. Well, again, I guess, you
12 know, my testimony is -- is -- is our
13 practice prior to the incident. And I'm sort
14 of not the one to talk about the kill during
15 the incident.

16 Q Oh. Okay. And who is the one you
17 would defer to speak about that?

18 A That would be Roger Schwecke.

19 Q Okay. Understood. With that,
20 let's turn to -- can I infer from that that
21 the -- any questions about the leaks on the
22 well -- at other depths are also Mr.
23 Schwecke's purview; is that correct?

24 A I think with regard to kill work,
25 the kill attempts after the incident of
26 October 23rd, to the extent it applies to any
27 of those kill attempts, I would defer to Mr.
28 Schwecke.

1 Q Okay. Understood. And just when
2 you say "after the incident," you mean the
3 incident from October 23rd, 2015 to during
4 the incident as well from October 23rd, 2015
5 to February 2016, that's all Mr. Schwecke's
6 purview per SoCalGas; is that right?

7 A Yes, that's correct.

8 Q Understood. I'll work with that.
9 Thank you. Okay. Let's -- with that, if we
10 could go to the Bates-stamp in your opening
11 testimony with -- SoCalGas Bates No. 1.0004.
12 And there it is. And that's page 3, and
13 we're at line 7. And there you discuss the
14 crossover -- thank you. There you discuss
15 the crossover flow port at approximately 8451
16 feet on Well SS-25.

17 Do you see that?

18 A Yes.

19 Q Okay. So just as a reminder, I had
20 understood that when we talked about
21 crossover ports that meant holes -- or I
22 think you used the term "slots" -- in the
23 SS-25 tubing at that depth.

24 Would you agree?

25 A I would agree. I think, you know,
26 we've used those -- all three during -- what
27 I'm referring to in the testimony is
28 crossover flow port.

1 Q Okay. Fair enough. Mr. Neville,
2 are you familiar with a report that was
3 prepared by Core Labs in November of 2015?

4 A November 2015? No. I'm not.

5 Q Okay. Then, in that case, if we
6 could go to -- just a clarification question.
7 So I think that the -- to the extent -- since
8 you're not familiar with it, I'm struggling.
9 The -- to the extent that the Core Labs
10 report relates to the kill event, then I'm
11 inferring that Mr. Schwecke can answer
12 questions about it. But I just want to
13 confirm. I think you clarified that for
14 other matters, but I want to be sure that
15 I'm -- confirm it -- that I'm understanding
16 that. Is that a fair -- fair assessment?

17 A I guess to the extent it would deal
18 with the kill, not having seen the report or
19 knowing what it's about, it's difficult for
20 me to say for sure.

21 Q Why don't we introduce it and see
22 if that helps. We're not trying to hide
23 this. We just want to be sure you're the
24 right witness. So let's introduce
25 Exhibit 276. This is the Core Lab report
26 from November 12th of 2015 I was referring
27 you to. So if we could -- if you could
28 scroll down. You see this document -- and

1 the first page is, I think, adequate, Mr.
2 Zarchy. It's AC_BLB_007010. Do you
3 recognize -- if you'd scroll up now with
4 that.

5 Do you recognize this document, Mr.
6 Neville?

7 A I don't recognize the document. I
8 do see the date, which does give me enough
9 information to say that it was likely
10 involved -- it had to do with the well-kill
11 operation.

12 Q Fair enough. Okay. Let's switch
13 exhibits then. Let's go to Exhibit SED-277.]

14 Okay. And this is SoCalGas
15 Response to SED Data Request 81 as shown on
16 the cover page. I'm wondering if you could
17 confirm -- if we could scroll down to the
18 first page and if you could confirm if you
19 recognize it as such. We can scroll down.
20 I'll read the Bates number at the bottom.
21 It's SED-277.001.

22 A So this is a data request and so
23 your question is do I recognize this
24 particular data request?

25 Q Correct.

26 MR. LOTTERMAN: Mr. Gruen, it might be
27 helpful to maybe go to the first question --

28 MR. GRUEN: Yeah.

1 MR. LOTTERMAN: -- to see if
2 Mr. Neville recognizes the subject matter.

3 ALJ HECHT: We'll be off the record.
4 (Off the record.)

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

7 While we were off the record, we
8 took a few minutes to look at this data
9 request question. It sounds like the witness
10 is not familiar with it and this is going to
11 be deferred to witness Schwecke who will
12 still be coming up in a few days.

13 Yes, Ms. Bone.

14 MS. BONE: Yes, your Honor. I just
15 wanted to figure out -- I believe that SED,
16 when it issued its data request, asked
17 SoCalGas to identify the people who were
18 responding to each question.

19 Is that correct, Mr. Gruen?

20 MR. GRUEN: It is for most of the data
21 requests, I think beginning at approximately
22 Data Request 17. That was the standard
23 practice in the instructions, that's right.

24 MS. BONE: Right. And I just note that
25 Cal Advocates routinely also requests that a
26 utility, particularly SoCalGas, identify the
27 witness that is sponsoring each data response
28 and that part of the problem we have here is

1 that my understanding is that SoCalGas has
2 not complied with that data request
3 instruction, and so I just want to make that
4 observation on the record.

5 Mr. Gruen, you can speak up if I'm
6 wrong about that.

7 MR. GRUEN: I can speak to it. I
8 don't -- that's not wrong. We had actually,
9 I believe, if memory serves, met and
10 conferred with SoCalGas about this and put a
11 motion forward. We were concerned about this
12 kind of inefficiency in hearings with exactly
13 this problem where we would be asking the
14 questions of the wrong witness and it's our
15 understanding --

16 MS. BONE: And --

17 ALJ HECHT: Ms. --

18 MR. GRUEN: It's our understanding that
19 SoCalGas has refused to provide the
20 witnesses' names for multiple data responses.

21 ALJ HECHT: Ms. Bone and then
22 Mr. Stoddard.

23 MS. BONE: I will just say that in
24 other proceedings I've been in, such as Aliso
25 Canyon, the utility routinely creates a
26 banner across the top and specifies
27 specifically what the data request is, what
28 it's responding to, who was providing the

1 response, so it is not out of the typical
2 norm.

3 It is actually the exception that
4 SoCalGas has routinely not provided
5 information about who is responding to data
6 requests. They routinely do this in every
7 other proceeding I'm engaged with them on.
8 We routinely ask them to provide them and
9 they refuse.

10 ALJ HECHT: I do not know whether it is
11 the standard practice, whether they were
12 asked to provide it, or whether they refused
13 so I will turn to Mr. Stoddard.

14 MR. STODDARD: Thank you, your Honor.
15 The issue that Ms. Bone is raising at this
16 time was briefed extensively in a motion to
17 compel. Cal Advocates actually had an
18 opportunity to weigh in at that time to the
19 degree that they wanted to. That issue was
20 addressed by your Honors.

21 At this point in time data requests,
22 as we pointed out in that motion, can be
23 asked of a witness to the degree that it
24 relates to their testimony and that it is
25 within the scope of their testimony. As
26 Mr. Neville, I believe, testified a few
27 moments ago, these are primarily related to
28 the well-kill operations, which aren't within

1 the scope of Mr. Neville's testimony. Again,
2 this has been addressed already in motions
3 practice.

4 ALJ HECHT: Is there any response to
5 that?

6 Yes, Mr. Gruen.

7 MR. GRUEN: Your Honor, the concern we
8 have is exactly what we're experiencing and
9 we briefed it, which is that there's an
10 inefficiency, as well as, frankly,
11 signposting all of the questions that are
12 going to be on cross so that SoCalGas has
13 advance notice of all the questions we're
14 going to ask. So we're doing our best to
15 cooperate and get through this long line, but
16 this was exactly the concern we flagged in
17 the motion and our concern about not using
18 our cross time efficiently remains.

19 ALJ HECHT: Okay. Mr. Stoddard.

20 MR. STODDARD: Yes, your Honor. Thank
21 you. Again, here, you know, Mr. Neville's
22 testimony defines the scope for purposes of
23 cross-examination. SED is -- you know, we
24 have not been objecting frequently throughout
25 this cross-examination I would note as well.
26 But the fact remains if the witness doesn't
27 know about something, the witness doesn't
28 know about something.

1 Another point here is SED has
2 defined, you know, has asserted specific
3 violations and our witnesses have responded
4 to those in their testimony. In this
5 instance, I mean it's not clear to me exactly
6 where this data response lands within the
7 scope of those violations, and SED is asking
8 questions that, frankly, could have also been
9 asked in the course of discovery.

10 But either way, at the end of the
11 day, this was briefed extensively in a motion
12 to compel and was addressed by your Honors
13 and SED can proceed with the
14 cross-examination within the scope of
15 Mr. Neville's testimony.

16 ALJ HECHT: Any other last responses?
17 I see none. I do not want the witness to
18 have to try to answer questions that he
19 doesn't know about and that he can't answer.
20 If these are ones he can't answer, then that
21 is where we are and that's what we need to
22 deal with.

23 I recognize the observation that has
24 been made about providing witnesses and
25 information; however, in this instance,
26 Mr. Neville cannot respond to the questions,
27 and it sounds like Mr. Schwecke, who has not
28 been up yet, will be able to. So I'm going

1 to hope and expect that that is true, and I
2 would like us to proceed with something that
3 is within the area of this witness.

4 I would appreciate it if to the
5 extent that this may happen again, that
6 parties meet and confer at least briefly
7 before we come back tomorrow or the next day
8 and try to make sure that the right areas are
9 directed to the right people. I prefer that
10 this not recur. But I'm not having somebody
11 try to answer questions that he can't answer.
12 So with that, I'd like to move on.

13 Yes, Mr. Gruen.

14 MR. GRUEN: Your Honor, if I may, part
15 of what we're struggling with here is to the
16 extent -- this is potentially a line of cross
17 that's a hybrid; that is, it may well relate
18 to parts of his testimony even if he's not
19 familiar with, in this case, the CoreLabs
20 report and he just doesn't know it.

21 So our concern is we get to
22 Mr. Schwecke and then he's familiar with the
23 report, but not the crossover ports and then
24 we don't have a witness who can answer the
25 panoply of questions that this relates to.
26 So we're struggling with staying within the
27 scope of testimony. Of course, when it's
28 deferred to Mr. Schwecke, we'll work on that,

1 but this may be one of those, you know, those
2 concerns of how do we find the right witness.

3 We'll certainly do our best and, you
4 know, we can ask these lines of Mr. Schwecke
5 when his turn comes and go from there. We'll
6 try to continue to stay within Mr. Neville's
7 testimony to the extent that we can do that.
8 We'll do the best we can.

9 ALJ HECHT: Thank you. I take your
10 point about a possible hybrid. We can return
11 to a witness if we need to in the event that
12 you find that there is something that we need
13 to go back to. I would prefer not to do
14 that, but if we end up in that situation,
15 then that's probably what we'll do. At this
16 point, it isn't clear to me whether that will
17 happen and the questions are being deferred
18 to witness Schwecke.

19 MR. GRUEN: Okay. Understood, your
20 Honor. We'll do our best.

21 ALJ HECHT: Okay. Thank you.

22 BY MR. GRUEN:

23 Q Okay. So, Mr. Neville, you recall
24 talking about the crossover ports in your
25 testimony; correct?

26 A Yes.

27 Q Maybe we can help with this line.
28 Are you aware of any records in the SS-25

1 well file or anywhere else at SoCalGas that
2 named these holes in the SS-25 tubing that
3 we've been talking about, actually called
4 them crossover ports or crossover flow ports,
5 prior to SoCalGas data responses to SED?

6 A I'm not aware of that. My
7 recollection is in writing the testimony and
8 just my experience in the field, that's what
9 they were called and so I used the term
10 "crossover ports."

11 MR. GRUEN: Can we go off the record
12 for a moment, your Honor?

13 ALJ HECHT: Yes.

14 We'll be off the record.

15 (Off the record.)

16 ALJ HECHT: We'll be back on the
17 record.

18 Please proceed, Mr. Gruen.

19 MR. GRUEN: Okay, your Honor.

20 Q If we could go to Exhibit SED-278,
21 we see there SoCalGas Response to SED Data
22 Request 89.

23 Let's scroll down, Mr. Zarchy.

24 Mr. Neville, do you recognize
25 SoCalGas Response to Data Request 89?

26 A It would be helpful to scroll down
27 to the first question.

28 Q Sure. Go ahead, Mr. Zarchy. I

1 think we can go -- I recognize there's a
2 CoreLabs question there. Why don't we go to
3 Question 3a, which is on SED-278.005. We
4 still have reference to the CoreLabs.

5 I'm sorry, your Honor. Pardon me.
6 Let's see if there's --

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

8 (Off the record.)

9 ALJ HECHT: We will be back on the
10 record.

11 While we were off the record, we
12 discussed documents and familiarity with
13 those documents and which witnesses can
14 answer what. My understanding is that SED
15 and SoCalGas will meet and confer tomorrow
16 and try to work out some of these details so
17 that we can be a little bit more efficient in
18 cross going forward and that questions can be
19 asked of the person who is most likely to be
20 able to answer them.

21 With that, I think that we can start
22 again with Mr. Gruen.

23 MR. GRUEN: Thank you, your Honor.

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

25 (Off the record.)

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

28 While we were off the record, we

1 discussed scheduling a little bit and SED
2 will be providing an updated schedule
3 reflecting some of these changes in lines of
4 cross and which witnesses they're for. That
5 isn't something we're going to worry about
6 today. We are going to take a 15-minute
7 break until 2:30 so that we can all have a
8 moment, so we'll be off the record.

9 (Off the record.)

10 ALJ HECHT: We'll be back on the
11 record. We took a 15-minute break and we are
12 coming back now for more cross-examination of
13 witness Neville. I'm going to make a couple
14 of observations first.

15 I was thinking at the break that
16 these are very, very technical subjects and
17 most of us are not very, very technical
18 people. So there's the issue of technical
19 people trying to describe technical things to
20 a lay audience and the issue of everybody
21 trying to interpret those things and put them
22 neatly into boxes where they may or may not
23 fit.

24 I think there are a lot of
25 opportunities to misinterpret or
26 misunderstand or talk past each other. I
27 think that that is part of what's going on
28 with this. It actually doesn't surprise me

1 that much that we would have instances in
2 which there would be witnesses being asked
3 questions that might not be in their area
4 because their area is very technical and
5 specialized and we are trying to understand
6 it.

7 So this is my observation and my
8 hope is that we can extend one another a
9 little bit of patience about that. That may
10 not be all that's going on with this, but I
11 think it's definitely something that's going
12 on with this. And that isn't anybody's fault
13 and that's something that I think we are all
14 going to be struggling with who are
15 nontechnical people dealing with a technical
16 subject. So maybe that's something I didn't
17 need to say, but I took that opportunity both
18 to reset my patience and get a bigger
19 notepad. Hopefully other people can do the
20 same thing and we can resume.

21 With that, we can pick up with
22 Mr. Gruen.

23 MR. GRUEN: Thank you, your Honor.
24 I'll certainly attempt to redouble my efforts
25 with that in mind. Appreciate that.

26 Q Mr. Neville, before we went off the
27 record and had some procedural discussions,
28 do you recall us talking about what you

1 mentioned as crossover ports or slots or
2 holes in the tubing of Well SS-25?

3 A Yes.

4 Q And if I may, just with regards to
5 that, approximately, or in your
6 approximation, how many holes or slots or
7 crossover ports were there?

8 A That's a difficult question. I
9 don't know the answer.

10 Q Okay. What is the purpose or what
11 was the purpose -- I should ask it in the
12 past tense -- what was the purpose of the
13 subsurface safety valve in Well SS-25?

14 A So the purpose was to -- and this
15 was an annular flow subsurface safety valve.
16 The purpose was to have the ability for the
17 well to automatically shut in the tubing
18 below the crossover flow port. By doing
19 that, by shutting in the tubing below the
20 crossover flow port, you would shut in the
21 casing and the tubing at the same time.

22 Q Why would it shut in -- oh, I see.
23 It would shut in the casing and the tubing at
24 the same time, if I'm tracking you right,
25 because you're saying there were no crossover
26 ports or holes below the subsurface safety
27 valve in the tubing; is that right?

28 A That's right.

1 Q I'm tracking you. Okay. So with
2 regards to the openings or the holes, you
3 said you didn't know how many openings there
4 were. Do you have an approximation of how
5 many holes or slots or subsurface safety
6 valves -- pick your term -- but how many of
7 those would you estimate to have been in the
8 tubing?

9 A Typically the design for a
10 crossover port would be to try to replicate
11 the surface flow area of the tubing so that
12 you wouldn't restrict flow with the ports.
13 So with that in mind, and comparing that to
14 other crossover ports that I am familiar
15 with, more familiar with, I would estimate
16 that they'd be over the course of a half of a
17 foot in length. There might be several
18 ports. They're very -- what I'm saying is
19 the small length of them.

20 Having not seen this particular
21 housing, you know, I can't say that with
22 certainty. But typically it would be large
23 enough not to restrict flow but it wouldn't
24 be too large.

25 Q Okay. So it sounds like the answer
26 typically is several, there are several slots
27 or openings or crossover ports that are found
28 in tubing in the Aliso wells. Would that be

1 an accurate approximation?

2 A It could be one -- I just don't
3 know. It could be one; it could be several.
4 They would be located really at the same
5 location. I'm starting to get outside of my
6 comfort zone because I just haven't seen this
7 tool. But they would be -- in length from
8 top to bottom, I can't -- you know, I would
9 say they would be six inches in length
10 approximately.

11 Q I'm sorry, when you say, "I haven't
12 seen this tool," what tool are you referring
13 to?

14 A The housing for the subsurface
15 safety valve.

16 Q I see. Okay. Let me ask you about
17 when the crossover ports or when the
18 openings, the holes or slots, were first put
19 in the tubing. What date were these openings
20 or holes first in the tubing?

21 A So they would have been installed
22 at the 1979 workover for the well. That
23 would have been the time they would have been
24 installed.]

25 Q Why is that?

26 A The work -- it -- a workover is
27 required to run tubing in a well, and this
28 particular housing actually screws into the

1 bottom of the tubing. So it really has to be
2 run in with the tubing.

3 Q Okay. Thank you. Let's turn to
4 Exhibit SED-279.

5 Mr. Zarchy, if you have that
6 available.

7 And so this is part of SoCalGas
8 response to data request 70 -- excuse me, 89.
9 Let's go to the Bates number, Bates number
10 AC_CPUC_0000067, and if we scroll to the top.

11 So do you see -- if we could scroll
12 back to the first page, do you see that as --
13 as part of the response to data request 89?

14 A Yes.

15 Q Okay. And if we scroll back down,
16 is this a document -- a schematic of well
17 SS-25?

18 A Yes, it appears to be.

19 Q And -- okay. And this is dated
20 June 16th of 1986, as shown in the right
21 corner? That's an accurate date for this
22 document. Correct?

23 A It appears to be. It's the same
24 font as the rest of the diagram. I -- yes.

25 Q Okay. Fair enough. Let's go to
26 the middle of the page where it shows --
27 that's good. Thank you -- where it shows the
28 8451 feet, the Camco two-and-a-half inch

1 SSSV. Do you see that?

2 A Yes.

3 Q So that's the Camco -- that's
4 referring to the Camco subsurface safety
5 valve. Is that right?

6 A That's right.

7 Q Okay. And if we go to the upper
8 corner of this document, thank you, in the
9 upper right corner there, it shows from
10 6-25-76 to six -- 7-9-76, cleaned out to
11 8748 feet, ran tubing with SSSV. Is that
12 right?

13 A Yes.

14 Q And TBG is tubing, in that case.
15 Right?

16 A Yes.

17 Q Okay. Can you show me this -- in
18 relation to the subsurface safety valve, the
19 SSSV at 8451 feet, where this says that the
20 crossover ports were -- were created?

21 A So if you can scroll down --

22 Q Sure.

23 A -- a little --

24 MR. GRUEN: Go ahead.

25 THE WITNESS: -- to the subsurface
26 safety valve --

27 MR. GRUEN: Mr. Zarchy, if you would.

28 THE WITNESS: Okay. So the -- as

1 discussed earlier, the Camco subsurface
2 safety valve, which is really the housing, is
3 the -- is at 8451, and typically, that's the
4 top of this tool. The tool has a certain
5 length associated with it, and there should
6 be -- and I'm trying to recall this, for
7 sure. There's -- I believe there was a --
8 a -- a more detailed tubing diagram that
9 might show the whole -- the -- the port.
10 This diagram shows, you know, the top of that
11 tool, and it doesn't have the -- the complete
12 details of the tool in this diagram, the fine
13 details.

14 BY MR. GRUEN:

15 Q Okay. So if I'm understanding,
16 this -- I think what I'm asking is where
17 the -- the actual naming of crossover ports
18 is here.

19 A Yeah.

20 Q It's not in this document, is it?

21 A It's not in this document.

22 Q Okay. And you can't point us to a
23 document where it is, at this point. Am I
24 tracking that correctly, as well?

25 A Not without looking into the well
26 file. What I -- what I can say is that the
27 crossover flow port -- port is below 8451,
28 and the -- above 8472.

1 Q Okay. And just for the record,
2 8451 and 8472 are the two points on this
3 schematic. The 8451 shows the Camco
4 two-and-a-half-inch subsurface safety valve
5 at that depth, and the 8472 feet shows an
6 Otis XN 2.205-inch ID. And between those two
7 depths, there's nothing shown on this
8 diagram. Correct?

9 A Right. There's -- there's -- the
10 profiles are shown. Those rectangles, those
11 are profiles. The top two rectangles are
12 where the subsurface safety valve would sit.
13 The bottom two rectangles in that would be
14 where a mechanical tubing plug would sit.
15 But, those -- those aren't -- those aren't
16 specifically labeled. They're just depicted.

17 Q Is there anything else on this
18 document that isn't labeled, but depicted,
19 Mr. Neville?

20 A The -- the main components I see
21 are the -- are the gas -- the -- the MMG
22 (inaudible), the Camco and the XN. I'm
23 not -- I -- I don't believe that is the case.
24 I think the -- the downhole components are
25 depicted.

26 Q Okay. Thank you.

27 THE REPORTER: Your Honor, this is the
28 reporter.

1 ALJ HECHT: Yes. Go ahead, please.

2 THE REPORTER: I need to go off the
3 record for technical difficulties.

4 ALJ HECHT: Of course. We'll be off
5 the record.

6 (Off the record.)

7 ALJ HECHT: We'll be back on the
8 record.

9 We were off the record for a few
10 minutes while the court reporter fixed
11 something, and we're going to continue on
12 now.

13 Mr. Gruen, had you just asked a
14 question?

15 MR. GRUEN: I don't believe so, your
16 Honor.

17 ALJ HECHT: Okay.

18 MR. GRUEN: We -- we can continue on.

19 ALJ HECHT: Okay. Go ahead.

20 MR. GRUEN: Thank you, your Honor.

21 Q Let's go back to your opening
22 testimony, if we could, Exhibit SoCalGas-01,
23 and the page with Bates stamp with 1.0007;
24 and it's also page 6, when you get to there.
25 So scrolling up from there to line 22, just
26 above -- that's good.

27 There, it says, "SoCalGas used the
28 removal of the tubing during a workover as an

1 opportunity to perform certain kinds of
2 integrity tests on the well's production
3 casing that are not possible when the tubing
4 is in place, such as running an ultrasonic
5 inspection tool, or USIT, which uses
6 ultrasonic sound waves to circumferentially
7 measure the internal radius and thickness of
8 the casing, as well as cement quality."

9 Do you see that?

10 A Yes.

11 Q And so, to run it, that's a -- USIT
12 is ultrasonic inspection tool, as I
13 understand it.

14 So to run a USIT tool on tubing,
15 SoCalGas had to first remove that tubing
16 during a workover. Correct?

17 A Yes.

18 Q And to your knowledge, when was the
19 last time prior to October 23rd, 2015 that
20 SoCalGas did a workover on well SS-25?

21 A That would be in the 1979 workover.

22 Q Okay. And that -- in order to do a
23 workover, SoCalGas must kill the well. Is
24 that right?

25 A Yes.

26 Q Okay. So when was the last time
27 prior to October 23rd, 2015 that SoCalGas
28 removed the tubing from well SS-25?

1 A It would have been in 1979 at that
2 workover.

3 Q Okay. And when was the last time
4 prior to October 23rd, 2015 that SoCalGas --
5 SoCalGas ran a USIT to measure the internal
6 radius and thickness of the SS-25 tubing?

7 A It -- it wasn't run on SS-25. And
8 I -- I think when I gave that statement in
9 the testimony, I -- I didn't mean to imply
10 that that occurred from the beginning of
11 storage operations until present date. It --
12 it was meant to represent the -- I guess, the
13 practice as of -- or at -- at the time of --
14 of the incident, was -- which was
15 October 23rd, 2015. I -- I didn't provide
16 any kind of a -- a timeframe when that was
17 started.

18 Q Okay. So you don't know the answer
19 to the question, then. Am I tracking that
20 right?

21 A I do know the answer. It -- we
22 started the -- the -- the ultrasonic
23 inspection in 2007, as --

24 MR. LOTTERMAN: Mr. Gruen, would you
25 mind restating your question?

26 MR. GRUEN: Well, the question -- the
27 initial question was: When was the last time
28 prior to October 23rd, 2015 that SoCalGas ran

1 a USIT to measure the internal radius and
2 thickness of the SS-25 tubing. And I -- I
3 think, as a follow-up to that, Mr. Neville is
4 clarifying his -- whether he knows the answer
5 to that question.

6 THE WITNESS: Yes, I -- I do know that
7 an -- an ultrasonic inspection tool was not
8 run in SS-25. I do know that the last time
9 SS-25 was worked over was in 1979, and I --
10 I -- I know that a ultrasonic inspection tool
11 was not run in that workover. That tech --
12 technology wasn't available then.

13 BY MR. GRUEN:

14 Q When was the technology first
15 available, do you know?

16 A I -- I do know that in -- in 2007,
17 we began to run it, as I indicated, in
18 this -- as part of every workover. The
19 technology -- I -- I wasn't -- let's see.
20 I'm -- I'm saying it's probably late 1990s,
21 mid- -- mid- to late 1990s.

22 Q Okay. And the technology wasn't
23 used at that point in time until the -- the
24 time of the incident, on SS-25, as well. Am
25 I tracking that right?

26 A I would say it was used. It wasn't
27 used in every workover until 2007.

28 Q Okay. And specific to well SS-25,

1 it wasn't used for the invent of the
2 technology until the incident. Is that
3 correct?

4 A That's correct, it was not used in
5 SS-25.

6 Q Okay. Let's stay with your opening
7 testimony, and we'll go to the next page,
8 SoCalGas-01.00008, and that's page 7, lines
9 12 through 13, where you state: "As an
10 additional safety measure, SoCalGas had in
11 place a remote well kill system so that
12 SoCalGas could kill the well in the event the
13 well site was inaccessible."

14 Do you see that?

15 A Yes.

16 Q So I recognize your limitations
17 here, but since this is talking about a
18 general safety measure that applies to kill
19 events, I'd like to explore the -- probe that
20 statement.

21 So do you know, then, when SS-25
22 failed on October 23rd, 2015, or any time
23 after that, did SoCalGas or its contractors
24 use this well kill system to kill SS-25?

25 A I -- I -- I do know that it was not
26 used.

27 Q Why not?

28 A The remote kill system is a system

1 that -- it's a system of piping that connects
2 to the wellhead, both the -- the tubing inlet
3 of the wellhead and the casing inlet of the
4 wellhead, and this remote kill system allows
5 for the pumping of kill fluid at a certain
6 distance from the wellhead, just in case the
7 wellhead was not accessible. So I -- I know
8 the wellhead was accessible, and so the -- in
9 the -- the remote well kill system was not
10 used.

11 Q How many times has SoCalGas used
12 that well kill system in the field?

13 A I know of -- of one case where this
14 well -- where a remote well kill system was
15 used.

16 Q And when was that?

17 A It was sometime in the early
18 eight -- 1980s.

19 Q Okay. Let's go to Exhibit 285,
20 please, if we can. And this is SoCalGas
21 response to data request 11.

22 And if we scroll down, do you see
23 there SoCalGas response to data request 11 --
24 part of the response, rather?

25 A Yes.

26 Q Okay. And if we go to your reply
27 testimony, Exhibit SoCalGas-15, to orient
28 ourselves about this, page 4, and let's go to

1 the bottom, page 4, the next one down.

2 Sorry. I believe it is
3 SoCalGas-15.0005, and we go to line 8, yeah,
4 you talk about electronic databases during
5 the incident there. Do you see that?

6 A Yes.

7 Q Okay. At the time of the incident,
8 did SoCalGas use PI Historian, where you talk
9 about -- let me just orient you.

10 Lines 13 to 14 talks about PI
11 Historian collecting and maintaining
12 operational data for the entire Aliso
13 facility, including individual storage wells.
14 Do you see that?

15 A Yes.

16 Q Okay. At the time of the incident,
17 did SoCalGas use PI Historian to track all
18 leaks in Aliso wells?

19 A To track all leaks. This was -- PI
20 was an operational data system, so leaks were
21 not tracked in PI.

22 Q Okay. So let's -- but, you're
23 familiar with the well files to the extent
24 they were tracking leaks, then, as -- as a
25 person familiar with SoCalGas records and
26 well files. Correct?

27 A Yes. I'm general -- yes, I'm
28 familiar with -- with the well files --

1 Q Okay.

2 A -- yes.

3 Q Okay. Let -- let's go back to
4 Exhibit 285, if we can. And if we go to
5 question three, which asks: Provide dates of
6 any casing leaks and breaches -- or excuse
7 me, or breaches in casing for the life of the
8 well, and there are questions there, the
9 sub-questions, identify type of leak and well
10 depth location, provide method of leak
11 mitigation, how it was stopped, provide
12 method of repair and repair report for each
13 leak, provide the assessed cause of the leak
14 or casing breach -- so do you see all that?

15 A Yes.

16 Q And the responses to questions "A,"
17 "B," and "C" refer us to the Bates range
18 AC_CPUC_0036138 through AC_CPUC_0036139; and
19 then, as well, in responses, you -- we have
20 36140. Do you see all that?

21 A Yes.

22 Q And, in fact, SoCalGas provided all
23 those pages to SED in one document. So we
24 have the document entitled -- that is
25 AC_CPUC_0036138 through
26 0036511.leaks.supportingdocs.

27 And if we could turn to Exhibit 286
28 to show that, that's SoCalGas response to SED

1 data request 11 documents, and if we could
2 scroll down and enlarge, thank you, thank
3 you, and if we could go to the bottom of
4 that, so we can get the Bates number, AC --
5 AC_CPUC_0036138 is the Bates number.

6 And you -- do you see this as part
7 of the response to data request 11, then?

8 A Yes, I do.

9 Q Okay. And was this list created
10 specifically to respond to data request 11,
11 question three, that we just read?

12 A Yes, it was.

13 Q And at the time that SoCalGas
14 provided this response to SED, was this --
15 excuse me, was this a complete list of casing
16 leaks at Aliso?

17 A The -- that was the -- the purpose
18 of the -- providing the list. The thinking
19 was that it was a complete list, yes.

20 Q Okay. Do you know who prepared
21 this list of leaks?

22 A Yes. There were several engineers
23 involved, and a -- and a contractor.

24 Q Okay. Was -- were you part of the
25 team that prepared this?

26 A Yes.

27 Q Okay. Let's turn to Exhibit
28 SED-287, and this is entitled "SoCalGas

1 Interoffice Memo re Forms Used at Aliso,
2 9-4-1981," and if we could skip to the page
3 with the Bates stamp ending in 1149.

4 Actually, before we do, I'm sorry,
5 Mr. Zarchy, if we could go to the first page.

6 So do you see this as the -- thank
7 you. So this is --
8 I1906016_SCG_SED_DR_88_0001124 is the Bates
9 number, and if we scroll up, this was --
10 this -- this is a piece of interoffice
11 correspondence with the subject line "Forms
12 Used at Aliso Canyon," and date, September
13 4th, 1981.

14 And do you see all that?

15 A Yes.

16 Q The first sentence of the memo:
17 "Attached are filled out samples of the major
18 forms in use at Aliso Canyon along with some
19 blank master forms."

20 Do you see that?

21 A Yes.

22 Q So based on this, was a -- was the
23 Aliso Canyon well leaks here a significantly
24 or often used form in use at Aliso between
25 1977 and 1981?

26 A I -- I really wouldn't know. It
27 was before my -- my time, having started with
28 the company in 1991.

1 Q Okay. How long did SoCalGas keep
2 records that tracked Aliso Canyon well leaks?

3 A I believe the records -- so if
4 you're talking about a form, I don't know the
5 answer to that. A form, to me, would be a --
6 kind of a listing of leaks. However, the --
7 the records that -- that are associated with
8 leaks were kept from the start of storage
9 operations, and continued. The -- the leaks
10 are represented by such things as the
11 temperature surveys, the noise logs and the
12 workover histories.]

13 Q Okay. Let's go to the page with
14 Bates number ending in 1149, if you would,
15 Mr. Zarchy. And there we've got the Bates
16 number. So the basis for me asking about
17 1977 is the -- you see here -- just to ask
18 questions that show the basis for it --
19 sorry. I see a gray box that just appeared
20 on my screen share. I wonder if it's
21 possible to -- there. Thank you.

22 The Aliso Canyon well leaks -- or
23 that document is entitled Aliso Canyon Well
24 Leaks, correct?

25 A Yes.

26 Q And those -- the leak entry shown
27 there begin in 1977. Do you see that?

28 A Yes.

1 Q Okay. So when I ask about the --
2 this -- the form being used between '77 and
3 '81, those are the basis for the dates. It's
4 these leaks as well as the form that we just
5 looked at. So that's why I'm asking. I
6 understand -- I want to be sure that you're
7 clear what the basis is.

8 So with that understanding, I
9 wanted to get clarity if the form we just
10 looked at has been used for tracking leaks at
11 Aliso on -- between '77 and '81. Was it used
12 often? Do you know?

13 A The only thing I would know would
14 be with what you've shown me here on this
15 form, and it looks like it was tracked from
16 1977 to -- I don't see the bottom date.

17 Q We can scroll down, if you would,
18 Mr. Zarchy. Yeah. Right there.

19 A That's all I would know. I have
20 not seen this form. So I would just have to
21 go on what I see in this exhibit here, that
22 leaks are tracked from the '77 date to the
23 '78 date.

24 Q But you -- you're familiar with
25 well -- the other well files for the other
26 wells, correct?

27 A Yes.

28 Q You haven't seen a form like this

1 in other well files?

2 A I have not seen this form in the
3 well files, no. At least I don't recollect
4 seeing this form.

5 Q Okay. Do you know if Blade was
6 provided with this leak information?

7 A I don't know.

8 Q Okay. But you were responsible at
9 least for preparing the document that
10 provided leaks -- the list of leaks to SED?
11 We -- you discussed that earlier.

12 A Yeah.

13 Q So were you responsible for
14 gathering leak-related information to respond
15 to Blade?

16 A No.

17 Q Do you know who was?

18 A I don't know.

19 Q Okay. Okay. Would you agree that
20 we only have -- if you scroll to the top of
21 this -- if you would scroll, Mr. Zarchy, to
22 the top of this list, I think there it shows
23 table 2, page 2. So since you -- let me ask
24 you this: Do you know who prepared this data
25 response?

26 A Could you go to the top of the --
27 is this the same data response?

28 Q It's Data Request 88. We can go --

1 do you want to go to the first page, Mr.
2 Neville?

3 A Yes, please. Yes. So I could see
4 the question.

5 Q Yeah. Oh, okay. So this is the
6 referenced document by the answer, but we can
7 go back to Exhibit -- I believe it's 287. We
8 could go to the prior exhibit. No, that's --
9 let's go one more back, if we could. Try
10 285.

11 MR. ZARCHY: This is Daniel Zarchy from
12 SED. We're already on 287.

13 MR. GRUEN: Okay. And -- thank you,
14 Daniel. Could you go to 285. I think that's
15 where Mr. Neville wants to go.

16 Q Is that what you're looking for?

17 A Yes. Was your question was I
18 involved with this particular data request?

19 Q Yeah. And I see that the Bates
20 numbers are not included, but I -- in the one
21 we just referenced, but were you -- you were
22 involved in this data request, correct?

23 A Yes.

24 Q Okay. But you weren't involved in
25 the data request that discusses the leaks in
26 Exhibit 287 that we just looked at, correct?

27 A That's correct because I haven't
28 seen that -- that form that you showed me.

1 Q Okay. Let's go back to -- I think
2 what I'd like to understand is, since you
3 haven't seen it, is it possible that that
4 form shows leaks that were not provided in
5 the data response you gave to SED then?

6 A Well, to be sure, we'd have to do a
7 side-by-side comparison. My team took great
8 efforts to review every single well file.
9 And we believe that -- you know, to the
10 extent that, you know, we worked diligent
11 enough to try to find everything we could, we
12 believe we have. That's not to say that we
13 missed one or two. I can't -- not without
14 doing a side-by-side comparison. But I
15 believe we did an exhaustive effort in
16 providing this data response.

17 MR. GRUEN: Okay. Your Honor, because
18 Mr. Neville doesn't -- hasn't seen this
19 document before, I'm left struggling to lay
20 foundation again. And this seems to be
21 related to his understanding of leaks, but he
22 hasn't -- he doesn't recognize it. So one
23 option I'll -- I could put out there is that
24 SoCalGas counsel could stipulate to this
25 document going into the record, and we could
26 move on.

27 Alternatively, I could see if
28 SoCalGas can identify the individual who is

1 responsible for preparing this data response.
2 We could then -- we could ask our cross. And
3 it might require that we -- this is
4 potentially another hybrid where we need to
5 ask the individual responsible for preparing
6 the response and Mr. Neville.

7 ALJ HECHT: All right. Mr. Lotterman,
8 do you have any thoughts on that?

9 MR. LOTTERMAN: Your Honor, here's my
10 suggestion. I know we're getting close to
11 the end of the day. Why don't I take -- why
12 don't I see if SoCalGas is willing to
13 stipulate as to the authenticity of this
14 document and then, I assume, remove the need
15 to examine someone on it, if that's what Mr.
16 Gruen is offering.

17 ALJ HECHT: Mr. Gruen.

18 MR. GRUEN: I -- so first of all, it's
19 not just stipulating to the authenticity.
20 It's stipulating to the document going into
21 the record.

22 MR. LOTTERMAN: Understood. That's --
23 that's --

24 MR. GRUEN: And with that in mind, I'd
25 like a chance to just consult -- and perhaps
26 what we could do is include that as part of
27 the meet and confer tomorrow.

28 MR. LOTTERMAN: Right.

1 MR. GRUEN: Before I agree to
2 something, I'd like to be sure to check with
3 the team.

4 MR. LOTTERMAN: Right. And the reason
5 why I say that, Ms. -- your Honor, is because
6 I suspect there are no -- there are no longer
7 any SoCalGas employees who have firsthand
8 knowledge of the information as shown on this
9 page.

10 ALJ HECHT: Thank you. Yeah. That is
11 a potential concern. Yes. Please follow-up
12 on that in your meet and confer. And
13 tomorrow there will be a number of things
14 that we can follow-up on including this. I
15 am hoping that we will have witnesses for
16 relevant lines of cross, and we'll come back
17 to that as well.

18 MR. LOTTERMAN: Is that okay?

19 ALJ HECHT: Yes.

20 Mr. Gruen, I wanted to just say
21 between 3:30 and 3:40. Is this a time that
22 it makes sense to stop, or is there something
23 else you can do that will take 10 to 15
24 minutes?

25 MR. GRUEN: I think there may be one
26 line that we could squeeze in, your Honor, if
27 you'll indulge us.

28 ALJ HECHT: Okay. I am going to call a

1 stop not later than 3:40. I want to do some
2 housekeeping before the end of the day, and I
3 need to be off by 4:00. So --

4 MR. GRUEN: I'll accept that -- I'll
5 gamble, your Honor. Thank you -- your
6 preferred stop. Understood.

7 ALJ HECHT: Go ahead.

8 MR. GRUEN: Thank you, your Honor.

9 Q Mr. Neville, so if we could go to
10 your testimony -- reply testimony, Exhibit
11 SoCalGas-15, and the page is SoCalGas 15.0010
12 and also page 9.

13 A Okay.

14 Q And there -- I'm sorry. The --
15 yeah. That's page 9. Maybe, Mr. Zarchy, if
16 you might be able to enlarge that slightly.
17 Thank you. So at line -- that -- great.
18 Thank you.

19 At line 20, Mr. Neville, you state,
20 "And the records required to kill SS-25 were
21 the in well file at the time of the kill
22 attempts."

23 Do you see that?

24 A Yes.

25 Q Did you look at the hardcopy SS-25
26 well file during the 111 days that SoCalGas
27 and its contractors were working on killing
28 the well?

1 A No.

2 Q So what's the basis of the
3 statement that you made that we just read in
4 testimony?

5 A Let me look at the -- there's a
6 sub-note 15. I just want to make sure I
7 gather my answer. So yeah. It -- I'm
8 referring to the -- to the records that
9 depict the downhole construction, and these
10 are the -- what's listed in parentheses. It
11 includes the drilling, and it includes the
12 three workovers, so the -- those records I
13 had seen in the well file post-SS --
14 post-incident. You know, obviously, I wasn't
15 there at the time. I'm -- since I've seen
16 them after, I'm assuming those documents were
17 there at the time. And those documents
18 depict what is in the well.

19 Q Those documents depict what is in
20 the well file, you mean?

21 A Those documents exhibit the
22 downhole tubing -- the tubing components and
23 the casing -- the completion interval. I'm
24 saying that with -- with a depiction of the
25 wellbore schematic and the three workover
26 documents and the drilling documents, that
27 that information is -- you know, is what
28 would be required for a well kill. Plus

1 there's a continuation of what else is
2 required in that same paragraph.

3 Q I see. But I want to hone in and
4 focus on -- I think the answer to the
5 question is you didn't see the stated well --
6 the well file for SS-25 during the SS-25
7 incident. I want to be sure I have that
8 correct.

9 A That's correct.

10 Q Is that right?

11 A That is right.

12 Q So doesn't it follow that you don't
13 know what records were in the well file at
14 the time of the kill attempts.

15 A Well, to the extent that I saw the
16 records after, of course, I did have to make
17 an assumption that they were there in the
18 well file before. If I had not seen the
19 records, after I would have flagged that and,
20 you know, noticed that a particular record
21 might be missing. But I did see the records
22 when I reviewed them -- when I reviewed the
23 well file, which, as you say, is after the
24 111 days.

25 MR. GRUEN: Okay. Thank you. Your
26 Honor, that's -- those are all the questions
27 that I have on that line at this time. And
28 if you'd like, we could move to housekeeping,

1 if your Honor wishes.

2 ALJ HECHT: Yes. I think this is a
3 good time for that. I want to thank Mr.
4 Neville for his time, and we will see him
5 again tomorrow. I appreciate everybody's
6 patience on this. I want to do a couple of
7 housekeeping things before we finish for the
8 day. And first is a question for Mr. Gruen,
9 and that is whether SED plans to renew its
10 motion to quash the deposition of Randy
11 Holter. If you do not plan to do that, then
12 either today or tomorrow we should discuss a
13 schedule on which that could happen. I
14 realized yesterday that you had made the
15 request in the morning, but if that was not
16 quashed, that you wanted to set a schedule so
17 it happened expeditiously.

18 MR. GRUEN: Thank you, your Honor. I
19 appreciate the opportunity to be heard on
20 that. Thank you for the follow-up. Your
21 Honor, in light of -- we had understood
22 yesterday that we were -- consistent with
23 your Honor's ruling from last week, that we
24 were afforded the opportunity to do a filing
25 by tomorrow, and we intend to do so.

26 ALJ HECHT: Yes. Okay. That answers
27 that question. So that is a ruling that we
28 will need to -- that is a motion that we will

1 need to rule on. So we don't need to discuss
2 the schedule at this point.

3 The second thing that I will say is
4 that I've gone back through some of the
5 documents and -- oh, yes. I'm sorry.

6 Mr. Stoddard, go ahead.

7 MR. STODDARD: Thank you, your Honor.
8 I was just asking whether or not we can be
9 provided an opportunity to file a quick
10 response to the motion to quash?

11 ALJ HECHT: Yes. You can file a
12 response. We can talk about a due date for
13 that, but it should be very quick.

14 MR. STODDARD: Understood, your Honor.

15 ALJ HECHT: Okay. We will get back to
16 that then tomorrow. I have also looked back
17 at all of the motions -- well, I haven't
18 looked at all of the motions in the
19 proceeding because I counted something like
20 45 of them, and each of them had several
21 attendants' responses and other things
22 attached to them. But I did find the January
23 6 motion to compel from SED that addresses
24 having a witness designated for each of these
25 data responses, and I think that that is the
26 one to which many people were referring
27 earlier. I apologize for not having had that
28 at the top of my mind.

1 Having found it, it appears to me
2 that we have not yet ruled on it. So that is
3 just something that's out there, and I wanted
4 to make that observation. If we find that
5 witness can't answer questions, we may have
6 to go back and address that in more detail.
7 I think we were hoping that that would not be
8 needed, but we're here now.

9 Any comments on that before I
10 continue?

11 (No response.)

12 ALJ HECHT: I do not --

13 MR. GRUEN: None from SED, your Honor,
14 at this time. Thank you.

15 ALJ HECHT: Okay. And then I wanted to
16 reiterate that tomorrow we will want some
17 follow-ups on the things we talked about
18 today including the authenticity of that
19 document and the follow-up on those couple of
20 Bates numbers, and I know you will have a
21 meet and confer tomorrow. So please remember
22 to update us on that.

23 And ideally tomorrow, by the end of
24 the day, I'd like to have an updated schedule
25 for the hearings going forward based on
26 however it appears that you're going to have
27 to be rearranging your cross. I think
28 mostly, if there's going to be a radical

1 change, that would be what I would want to
2 know, and there's more time to get the detail
3 of the schedule. But basically, if it's
4 going to change the dates on which we are
5 going to need to call the witnesses, I think
6 that would be something that would be
7 helpful.

8 Any comments on that?

9 MR. GRUEN: Your Honor, understood for
10 SED. Our part, of course. We're getting
11 feedback from other parties. I'm assuming
12 that at the moment SoCalGas and Cal Advocates
13 will keep their estimates as is. If not, we
14 welcome input from them, but I assume this is
15 really focused on -- the question is really
16 focused on whether SED, in light of what
17 happened today, will adjust its process in a
18 radical way.

19 Am I tracking that correctly?

20 ALJ HECHT: That is correct.

21 MR. GRUEN: Thank you, your Honor. Oh.
22 I'm sorry.

23 ALJ HECHT: If no dates are likely to
24 change, then probably all we need to know
25 tomorrow is you don't think the dates are
26 likely to change. So we will want the
27 updated schedule shortly thereafter.

28 MR. GRUEN: Understood. We'll do our

1 level best to do that. Thank you -- thank
2 you, your Honor.

3 ALJ HECHT: Any other comments on that?

4 (No response.)

5 ALJ HECHT: Okay. It does not appear
6 that there are other comments on that. I was
7 going to try to discuss the schedule more,
8 but there's no point in doing that because we
9 have to look into these things. One of the
10 things that I think we will want to discuss,
11 Mr. Gruen raised earlier, and that is trying
12 not to bring a witness across a significant
13 break of days in the hearings. So that is
14 another thing to consider when we look at the
15 schedule just so that we know, and we can see
16 if that is feasible. I do want to keep this
17 within the dates that we have now.

18 With that, does anybody else have
19 any housekeeping issues?

20 Yes, Ms. Bone.

21 MS. BONE: Yes. Thank you, your Honor.
22 I just wanted to bring your attention to the
23 fact that we've had some issues with the
24 exhibits that were served by SoCalGas. It
25 turns out that the exhibits that were
26 originally served back in March, none of them
27 are searchable. And so you have to
28 individually make each one searchable, which

1 is obviously time consuming for everybody to
2 be engaging in that.

3 Last night I sent them, both Mr.
4 Stoddard and Ms. Patel, a request that they
5 should re-serve all of their exhibits to the
6 parties and that the new versions of the
7 exhibits should be searchable. They should
8 also be legible because I'm finding that a
9 number of diagrams and other things are
10 simply not legible, and you can't even get to
11 see them or see what they say by enlarging
12 them and also that the files themselves
13 contain a descriptive file name so that we
14 know what we're looking at, that it's not
15 just labeled Exhibit 1 -- SoCalGas Exhibit
16 1 and SoCalGas Exhibit 2.

17 So we have also asked that they post
18 all the transcripts of the proceeding on the
19 website that they are maintaining. It seemed
20 appropriate. And we also ask that the
21 SoCalGas attorney represents that all the
22 exhibits -- that they haven't modified any of
23 the exhibits substantively that they are
24 going to re-serve on us.

25 So I had asked that they confirm
26 receipt of those requests. I have never
27 received any confirmation that they received
28 those requests. And so I wanted to bring

1 this to your attention because I just don't
2 think this should go on any longer. You
3 know, we've been trying to get a lot of these
4 issues addressed since the very first day of
5 the proceeding, and they still haven't been
6 addressed. And I just can't understand why.
7 This is just basic stuff that occurs in
8 proceedings that normally you don't have to
9 think about, but here we have to ask for
10 everything from them. I'm getting, as you
11 can tell, extremely frustrated.

12 ALJ HECHT: I see that we have a
13 response from Mr. Stoddard.

14 Please go ahead.

15 MR. STODDARD: Thank you, your Honor.
16 Yes, Ms. Bone raised this issue yesterday,
17 and we are working on converting all of the
18 exhibits to searchable. We hope to be able
19 to re-serve them this evening. And Ms. Bone
20 did note one exhibit that had a legibility
21 issue, which we've gone back and looked at.
22 And we will work on clarifying one graphic.
23 There was a slight reduction in file sizes
24 when we were converting them and
25 Bates-stamping them for posting on the
26 website, and in the reduction of the file
27 size, it degraded the quality of some of the
28 images. To my knowledge, and, you know,

1 unless Ms. Bone saw otherwise, when we
2 reviewed the documents while we were working
3 on this yesterday, after she raised it, it
4 appears that this only affected SoCalGas'
5 exhibits. And so we are working on
6 correcting it.

7 In terms of the file name issue,
8 when Ms. Bone raised this back in March, we
9 did reserve all the exhibits with file names
10 with the file title next to the exhibit
11 number, and the web page that SoCalGas
12 maintains shows the file names as well.

13 Ms. Bone's request for transcripts
14 being posted there as well is a new one.
15 Those transcripts are posted on the PUC's
16 docket page. I'm not sure why we also need
17 them posted on the SoCalGas' web page.

18 However, we will, you know, act in
19 accordance with your Honor's direction. But
20 yeah, we hope to have this issue resolved
21 this evening or first thing tomorrow morning.
22 We are working on it. It takes a little
23 while to balance the resolution with the
24 Bates numbering, with the file sizes on the
25 web page.

26 ALJ HECHT: All right. Thank you.

27 Yes, Ms. Bone.

28 MS. BONE: By way of clarification, if

1 you go to the web page, the file name is
2 still just SoCalGas-1, and then there is a
3 description of the -- of what the document
4 is, but it is not part of the file name. So
5 if we download them to our computer, we have
6 to add a descriptive file name. It won't
7 carry forward. So that's the concern there.
8 It still hasn't been done in a way that's
9 easily recreatable for everybody else.

10 ALJ HECHT: Yes, Mr. Stoddard.

11 MR. STODDARD: I'll confirm. But it's
12 my understanding that when we have served
13 these exhibits -- and again, here I'm
14 speaking about SoCalGas' -- after Ms. Bone's
15 initial request, we have been including in
16 the served version the file name, includes,
17 the title of the document. I'll confirm that
18 that's been done, but it's my understanding
19 we did make that change after she initially
20 requested it. So there shouldn't be a need
21 for Ms. Bone to download them from the web
22 since they were served on her separately.

23 But, again, the file name is clearly
24 marked here on the SoCalGas web page. And
25 I'm referring to the page -- I'm not sure
26 whether you have it open or not. But if you
27 look at the page, it says, "SoCalGas-01,
28 Prepared Opening Testimony of Dan Neville."

1 ALJ HECHT: I just opened it. It does
2 say that. It is not part of the file name.
3 But if they were served with the file name or
4 the document title connected to them, I think
5 that that is probably sufficient. They do
6 appear to be accessible, and they are clearly
7 identified on the website.

8 For the transcript, sure. Post the
9 transcript. I don't particularly see a need
10 for it. They are clearly accessible on the
11 Commission's website. I access them
12 frequently. But it can't hurt to have them
13 on the same page as the other stuff. I am
14 not thinking it will take that long to post
15 at this point 12 of those plus the rest going
16 forward.

17 Are there any issues that I missed
18 in that?

19 (No response.)

20 ALJ HECHT: I do not see any. Are
21 there any other issues?

22 (No response.)

23 ALJ HECHT: Okay. I do not see any.

24 Judge Poirier, do you have anything
25 to add this afternoon?

26 ALJ POIRIER: Nothing further for me.
27 Thank you.

28 ALJ HECHT: Great. Thank you. All

1 right. I think we're going to wrap-up if
2 there is nothing further from anyone. Thank
3 you, everybody, for your time and forbearance
4 today. It was not the easiest day, but I
5 think it was a very important one. I am
6 looking forward to hearing more tomorrow
7 about some of the things that we had to table
8 today. With that, I think we will adjourn.

9 We'll be off the record.

10 (Whereupon, at the hour of 3:48
11 p.m., this matter having been continued
12 to 10:00 a.m., May 5, 2021, the
Commission then adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, ANDREA L. ROSS, CERTIFIED SHORTHAND REPORTER
NO. 7896, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MAY 4, 2021.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS MAY 07, 2021.



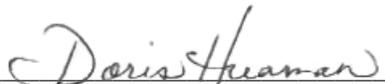
ANDREA L. ROSS
CSR NO. 7896

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, DORIS HUAMAN, CERTIFIED SHORTHAND REPORTER
NO. 10358, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MAY 4, 2021.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS MAY 07, 2021.



DORIS HUAMAN
CSR NO. 10538

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, REBEKAH L. DE ROSA, CERTIFIED SHORTHAND
REPORTER NO. 8708, IN AND FOR THE STATE OF CALIFORNIA,
DO HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MAY 4, 2021.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS MAY 07, 2021.


REBEKAH L. DE ROSA
CSR NO. 8708

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