

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 6, 2021
Pages 2174 - 2317
Volume 16

Reported by: Doris Huaman, CSR No. 10538
Andrea L. Ross, CSR No. 7896
Rebekah L. DeRosa, CSR No. 8708

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I N D E X

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VIRTUAL PROCEEDING

MAY 6, 2021 - 10:02 A.M.

* * * * *

DAN NEVILLE,

resumed the stand and testified further as follows:

ADMINISTRATIVE LAW JUDGE HECHT: We'll be on the record.

The Commission will please come to order. I am going to say these things for the second time because I said them off the record. This is May 6th, and these are the evidentiary hearings for Investigation 19-06-016. We are continuing with the cross-examination of Witness Neville. We got a late cross-examination exhibit from the Public Advocates Office, and we are not going to worry about the lateness of that. And I think I've already confirmed that everybody is ready.

So now, Mr. Gruen, you may begin.

MR. GRUEN: Thank you, your Honor.

CROSS-EXAMINATION (resumed)

BY MR. GRUEN:

Q Good morning, Mr. Neville.

A Good morning, Mr. Gruen.

Q If we could move to your opening

1 testimony, Exhibit SoCalGas-1, and go to page
2 1.0009, which is also marked as page 8 at the
3 bottom. And I'll wait for a moment for both
4 of you in the screen share to go there. And
5 the screen share is now showing the Bates
6 number -- the page with Bates No. SoCalGas
7 1.0009, and if you could let us know when
8 you're there as well on your hardcopy?

9 A Yes, I have it.

10 Q Okay. And if we turn to page 8,
11 lines -- I'm sorry. Excuse me -- lines 4 to
12 18. So here you discuss -- if I could
13 caption it from line 6 where you say, "The
14 surface safety system" -- excuse me -- lines
15 5 and 6, "The surface safety system consisted
16 of fail-close pneumatic operated valves
17 located on the wellhead and designed to close
18 by any of the following methods."

19 Do you see where I'm looking?

20 A Yes.

21 Q So when you talk about fail-close
22 pneumatic operated valves, those would close
23 the well at the top in the event that gas was
24 leaking at the wellhead of the well. Would
25 that be an accurate way to describe them?

26 A Right. It would -- the closing is
27 done at the top of the well if these
28 conditions are met, one of them including a

1 leak in -- in the flow laterals and part of a
2 section of a wellhead.

3 Q Okay. So if there's a -- I just
4 want to clarify. So you're saying that -- I
5 think I need to unpack that a little bit -- a
6 leak in the flow laterals, are these designed
7 to open and close if there's a leak in the
8 well like what happened in Well SS-25?

9 A No.

10 Q Okay. Let me see if -- so let me
11 follow-up with that. So the methods -- maybe
12 just to run through the testimony a little
13 bit, the methods that you talk about for the
14 wellhead being designed to close and open,
15 those are shown on lines 8 through 16; is
16 that correct?

17 A Yes.

18 Q And then lines 17 through 18, you
19 say -- you conclude:

20 The foregoing practices allowed
21 SoCalGas to effectively mitigate
22 leaks in the wellhead and surface
23 piping of UGS wells.

24 Do you see that?

25 A Yes.

26 Q Okay. Let's look at the -- the
27 next exhibit. It's Exhibit 283.

28 A Can I offer a clarification?

1 Q Of course.

2 A The valve -- the valve may close on
3 a subsurface leak, but the -- they are
4 designed to close if -- if a threshold
5 pressure is reached on the flow lateral
6 itself. So it's a minor clarification. But
7 they are designed to shut-in the well if a
8 certain threshold pressure is breached on the
9 flow lateral, and that would normally be due
10 to a leak in the flow lateral itself.

11 Q Okay. And maybe just for the
12 record, could you clarify what you mean by a
13 flow lateral?

14 A That's the piping that's connected
15 to the wellhead and runs to the processing
16 part in the Aliso Canyon facility before it
17 goes into the -- before it's metered in
18 these -- the facility. So the lateral piping
19 is piping on the well site.

20 Q Okay. So it's above-surface
21 horizontal piping, if you will? Is that an
22 accurate way to characterize it?

23 A Yes. That's a good way to
24 characterize it.

25 Q Okay. So your clarification is
26 that the -- these pneumatic valves may still
27 close if you've got a subsurface leak like
28 what happened in SS-25. And -- but they are

1 designed to close or will close if you've got
2 a leak on these flow laterals. Am I tracking
3 that right?

4 A Yeah.

5 Q Okay. And why may they close if
6 you've got a subsurface leak like what
7 happened in SS-25?

8 A Well, it just all depends on the
9 pressure in the line. If the pressure drops
10 to a threshold value, which I don't know
11 offhand, due to a leak, then they could
12 potentially close.

13 Q Do you know if the pressure of the
14 flow laterals dropped below that threshold
15 when SS-25 experienced the incident?

16 A I don't know.

17 Q Okay. Let's look at Exhibit SED
18 283. And if we could discuss -- look at
19 the -- the SS-25 well pressures here. Do you
20 recognize this document, by the way?

21 A Would you mind scrolling to the
22 top.

23 Q Sure.

24 A I don't recognize the document, no.
25 I note that the data is post-October 23rd.

26 Q Okay. Are you familiar with the
27 data that's shown on this document?

28 A I am familiar with what the data

1 represents.

2 Q Okay. Let's see if we can go
3 through this then with that understanding.
4 So if we could go to -- if we could scroll to
5 the bottom of this document, Mr. Zarchy, and
6 here, if we could go to -- ah, it's the next
7 one that has Bates -- I'm sorry. There was a
8 line. So it's Bates No. AC_CPUC_0000100.
9 And if we scroll back up.

10 So would you agree that the second
11 line here included a date -- a time of 4:00
12 p.m. on October 23rd, 2015?

13 A Yes.

14 Q And then row 3 we're at 4:10 p.m.
15 on October 23rd, 2015. Do you see where I
16 am?

17 A Yes. On the blue -- the part
18 highlighted in blue?

19 Q As well as the row just below it,
20 correct. Do you see where I am?

21 A Yes.

22 Q Okay. And in row 3 just below the
23 blue highlighted row, the note there says:

24 We initially suspected an up/down
25 wellhead seal leak between a 7
26 inch casing and the 11-3/4 inch
27 casing called Cameron.

28 Do you see that?

1 A Yes.

2 Q Do you know who Cameron is?

3 A Yes. Cameron is the supplier for
4 the wellhead itself, the wellhead and the
5 valves on the wellhead.

6 Q Okay. And the 4th row has -- the
7 one that has a blank reference number just
8 below row 3, that references Saturday,
9 October 23rd, at 6:00 a.m. Do you see that
10 row?

11 A That's Saturday, October 24th at
12 6:00 a.m.?

13 Q Yes. Pardon me if I misstated it.
14 I think your powers of observation may be
15 better than mine at this point in the cross,
16 but yes, October 24th, 2015 at 6:00 a.m.

17 A Yes. I see that.

18 Q Thank you. And there, the events,
19 Cameron began repairing wellhead seals of
20 SS-25 on that date at that time; isn't that
21 correct?

22 A Yes.

23 Q Okay. So is this the type of leak
24 that could be mitigated, as you describe, on
25 page 9 of your opening testimony? I'm sorry.
26 Is this the type of leak that could be
27 mitigated, as you describe in your opening
28 testimony page that we just described -- the

1 page that we just examined? Excuse me.

2 A No. This -- the wellhead seal leak
3 would not cause -- the shutting-in of the
4 valves would not mitigate a wellhead seal
5 leak.

6 Q Okay.

7 A If I stated that correctly. But
8 the safety system, if it were to activate,
9 would not mitigate a wellhead seal leak.

10 Q Because a wellhead seal leak is a
11 subsurface leak?

12 A It's between -- it's not exactly
13 subsurface. It's basically, really, at the
14 surface, but it's -- it's on the reservoir
15 pressure side of the safety valve. So if it
16 were to shut, the wellhead seals are still
17 exposed to the reservoir pressure.
18 There's -- that safety valve will not isolate
19 and shut-in a wellhead seal leak.]

20 Q Okay. And if there's a wellhead
21 seal leak, could that impact the pressure in
22 the flow lateral that you discussed earlier?

23 A It could. Yes, it could.

24 Q I just want to be sure you are
25 finished with your answer before I continue.
26 I don't want to talk over you.

27 A Yeah. I'm trying to think of the
28 configuration now. Give me a second to think

1 about -- think this through.

2 Q Take your time.

3 A So a wellhead seal leak could,
4 under some circumstances, cause the shut-in,
5 but it would be highly -- in my opinion, it
6 would be highly unlikely.

7 Q All right. Let's go to
8 Exhibit 284. This is Email from Todd Van de
9 Putte to Phil Baker, et al, RE: SS-25
10 Updates, 10-24-15. That's what the title
11 page shows. If we go to the bottom of the
12 page in the exhibit, we see Bates Number
13 AC_CPUC_SED_DR_17_0001471.

14 If we go to the top of this
15 document with that Bates page, here's an
16 e-mail dated October 24, 2015, from Todd Van
17 de Putte to Phil Baker, Amy Kitson, and Glenn
18 La Fevers.

19 Do you see that?

20 A Yes.

21 Q Okay. If we can look at the body
22 of the e-mail, middle of the first line, it
23 starts approximately in the middle:

24 Cameron did identify the wellhead
25 seals aren't holding (like what
26 happened at SS-44A). We tried
27 pumping up the seals with packing
28 and they won't hold full pressure.

1 The well-kill process should start
2 in about an hour and, if all goes
3 well, the well should be secured
4 by this afternoon.

5 Do you see where I'm reading?

6 A Yes.

7 Q Is this e-mail referring to the
8 wellhead leak during the SS-25 incident that
9 was identified in the last exhibit we
10 discussed?

11 MR. LOTTERMAN: Objection, calls for
12 speculation.

13 BY MR. GRUEN:

14 Q To your knowledge.

15 A Yeah, I'm sort of getting out of my
16 comfort zone having not been there. Could
17 you repeat the question.

18 Q I'll try to do it in a way that is
19 an accounting of counsel's objection. Let me
20 just ask you about your knowledge about the
21 identification of wellhead seals and whether
22 they were holding at the time of this e-mail,
23 10-24-2015.

24 Are you familiar with the wellhead
25 seals on SS-25 and whether they were
26 functioning on October 24, 2015?

27 A Yeah, I don't have any knowledge
28 other than what is shown in these two

1 documents. I'm familiar with the process of
2 testing wellhead seals but, you know, I can't
3 say based on this e-mail whether or not they
4 were holding. I'd really have to defer to
5 the e-mail itself from Mr. Van de Putte.

6 Q Okay. And would you also -- I mean
7 I recognize that this is talking about a time
8 period that may relate to the kill attempt,
9 the kill attempts during the incident. So to
10 the extent that we have further questions,
11 are you deferring to Mr. Schwecke?

12 A Yes. I realize this is very --
13 this is the second day and even prior to the
14 first kill attempt, so I'm not sure if he's
15 able to address this or not. I just don't
16 know.

17 Q Okay. But you can't?

18 A Yeah, I can't say, looking at just
19 what's shown here, whether or not the
20 wellhead seals were leaking. I would have to
21 just rely on Mr. Van de Putte's statement
22 here that they aren't holding.

23 Q Do you have any reason to doubt the
24 accuracy of Mr. Van de Putte's statement that
25 the seals weren't holding?

26 A I don't have any reason to doubt
27 it.

28 Q Okay. Fair enough. Let me just

1 ask you just based on your experience and
2 what this e-mail says. The likening of this
3 wellhead, what happened in Well SS-44A,
4 suggests that wellhead seals leaking is not
5 an isolated incident -- is not an isolated
6 incident; is that correct?

7 A That's correct. Wellhead seals
8 have leaked in the past.

9 Q I recognize we're talking about
10 this leak and we're looking at an e-mail
11 dated -- that talks -- that happens to
12 specify the leak during the time of the
13 failure or the incident, I should say, but do
14 you know how long the wellhead seal leak on
15 Well SS-25 identified in this e-mail existed?

16 A I wouldn't be able to estimate a
17 time for how long that may have existed.

18 Q Okay. And your testimony talked
19 about things like daily inspections and other
20 means of checking the wells; isn't that
21 right?

22 A Yes.

23 Q So wouldn't the methods that you've
24 identified for checking the wells that you've
25 discussed in your testimony have detected
26 this wellhead seal leak?

27 A I would expect that those
28 monitoring methods would have detected --

1 would detect a wellhead seal leak. The
2 weekly pressures would pick up -- are
3 designed to pick up a wellhead seal leak
4 because what happens is that the gas moves
5 from the production casing into the surface
6 casing, and so a weekly pressure is a check
7 of the pressure in the surface casing. So
8 that would be the primary way to pick up a
9 wellhead seal leak.

10 Q Understood. Mr. Neville, if we
11 could go to the next exhibit, Exhibit
12 SED-298, you see there the title of the
13 document on the cover page is 1979 SS-25 Well
14 Sketch?

15 A Yes.

16 Q If we go to the next page. And for
17 identification purposes, we can look at the
18 Bates number. We see it's
19 AC_CPUC_SED_DR_27_0004226. If we could
20 scroll up on that page.

21 Do you recognize this document,
22 Mr. Neville?

23 A Yes.

24 Q Okay. Indeed, that answer is
25 consistent, I believe, with the first day of
26 your testimony. If I'm not mistaken on your
27 first day of cross-examination, you mentioned
28 that there should be information about the

1 crossover ports that we talked about on the
2 1979 well sketch or the tubing details.

3 Do you recall talking about that on
4 your first day?

5 A Yes.

6 Q And is Exhibit SED-298, the
7 document we're looking at here, that 1979
8 well sketch that you were testifying about on
9 Monday?

10 A Well, there is a document that has
11 more detailed information of the tubing.
12 It's called a tubing detail and it would be
13 located in the workover history record of
14 1979, and it would have the location of the
15 ports.

16 Q Okay. But -- oh, go ahead. I'm
17 sorry. I didn't mean to crosstalk. Go
18 ahead.

19 A This particular schematic is more
20 general in nature. It shows the top of the
21 Camco SSSV, but it doesn't show the
22 individual components of that Camco SSSV.

23 Q And it doesn't show the crossover
24 ports or did -- let me be more specific. It
25 doesn't identify the crossover ports on
26 Well SS-25 that are stated in your testimony;
27 is that correct?

28 A That's correct.

1 A Yes. It -- it replaced the set --
2 subsurface safety valve that was run in 1976.
3 The --

4 Q Okay.

5 A -- "Replaced safety system" is --
6 refers to replacing the one that was run in
7 1976.

8 Q Okay. So that's not when it was
9 removed, then? It was just -- it was just a
10 replacement at that point?

11 A Right. So when we -- we -- the way
12 this -- the safety system works is that it --
13 it replaced the safety system, the housing
14 part of the safety system, with a new
15 housing. The actual valve is run in at a
16 separate point on wireline, and it's set in
17 the safety system.

18 Q Okay. Also on the sketch, if we
19 could zoom out again, we see at 8451 feet --
20 you see the Camco SC-1 2 1/2-inch subsurface
21 safety valve. Is that right?

22 A Yes.

23 Q Okay. So that's marking
24 approximately where the crossover ports that
25 you're describing in your testimony, but that
26 aren't identified in writing on this exhibit
27 are, right --

28 A That's correct.

1 Q -- where you -- where you say
2 they're -- they should be. Is that right?

3 A Yes. That -- sorry for talking
4 over.

5 The -- the 8451 marks -- typically,
6 that's -- marks the top of this particular
7 Camco safety system, which has a certain
8 length associated with it and has different
9 components, one of which includes the slots,
10 or -- or ports, and that is not represented
11 here in this schematic.

12 Q Okay. Before we leave this -- this
13 exhibit, if we go to -- if we look at the WSO
14 there, we see the water shutoff purse --
15 perforations at 8474 feet deep. Is that
16 right?

17 A Yes, 800 -- 8475 feet.

18 Q 8475 feet. Excuse me. Thanks. I
19 was off by one.

20 And the depth of the packer is at
21 8438 feet. Is that approximately right?

22 A I'm reading 8486 feet.

23 Q Yes. I'm sorry. Pardon me; where
24 we're seeing the word -- the letters PKR.
25 Okay. Is that right?

26 A Yes.

27 Q Okay. And if we look below the
28 packer, what does 4 1/2 -- I believe it says,

1 "JSPF" mean at 8400 -- excuse me, 8542 feet?
2 Do you see where I'm looking?

3 A Yes.

4 Q What does that mean, the 4 1/2-inch
5 JSPF?

6 A So that would be the -- that --
7 that defines the perforations that are shown
8 at -- at that depth as being 4 1/2-inch
9 diameter holes, jets shots per foot. So
10 there would be -- to summarize, there's four
11 half-inch holes that were shot by jet
12 perforating per foot.

13 Q And where -- at what depth are
14 those holes? They go from 8542 feet to
15 8559 feet, then?

16 A Yeah. The way it's -- it's
17 depicted on the schematic, it would be the
18 perf -- that all of the perfs that are shown,
19 8510 and -- that -- that appears to be two
20 sections of perfs. There's a section that
21 goes from 8510 to 8538, and then there's the
22 section that goes from 8542 to 8559. And
23 that's how I'm reading it from the schematic,
24 and that can be verified with the record.

25 Q Okay. And turning to the -- you
26 see the tubing that we were looking at a
27 moment ago on this sketch. I think it's
28 represented by -- it has running up and down

1 and sideways prints inside it, 2 7/8-inch
2 6.5/EUE.

3 Does that indicate the tubing? Is
4 that marked on the tubing, then?

5 A Yes.

6 Q Okay. And do you see the four
7 rectangles below that -- those words, or
8 those -- that -- that marking?

9 A Yes.

10 Q What do those four tang --
11 rectangles represent?

12 A So they appear to be the -- the
13 restrictions. They appear to be the -- the
14 profile. The -- the term that -- it's called
15 a profile nipple for the -- that's located
16 inside of the Camco tool, and there's a
17 profile nipple that's located in the Otis XN
18 tool. There's -- if you can see, the co- --
19 the Camco SSSV has a -- at 8451, in that
20 tool, there's a restriction down to 2.313
21 inside diameter. So that's -- that's the
22 restriction. I -- I believe the 2 7/8 is
23 2.441 inside diameter. So that restriction
24 inside the Camco would be a 2.313, and then
25 there's another restriction in the Otis XN,
26 which is a 2.205 ID.

27 Q Okay. If I'm tracking right, by
28 restriction, does that mean that nothing

1 that's larger in diameter than 2.313 inches
2 could get below the top restriction?

3 A Correct.

4 Q And same for the bottom
5 restriction, nothing that's larger than
6 2.205 inches could fit below that
7 restriction. Correct?

8 A Correct.

9 MR. GRUEN: Okay. Let's scroll down a
10 little bit on this sketch. That's -- that's
11 good. Thank you. That works fine. Thank
12 you.

13 Q Just quickly, one other question:
14 Are these -- when you -- you talked about the
15 restrictions, are these referred to -- are
16 these the same thing as what's referred to as
17 a no-go nipple?

18 A Yes. The lower one is -- is -- is
19 called a no-go nipple.

20 Q And what does that mean, no-go
21 nipple?

22 A Well, it -- by virtue of being a
23 restriction, it's -- there's a shoulder on
24 there that will accommodate a -- a mechanical
25 plug. And so, you know, for lack of a better
26 terminology, when you run a -- a plug that's
27 slightly smaller than -- than the tubing
28 diameter, but slightly larger than the -- the

1 XN, the 2.205, that's -- it's no-go. It's
2 not going to go through it. So that's how --
3 that's how the operator can know exactly
4 where to set that plug. He'll look at the
5 depth, and he'll see that he can't run the
6 plug any further than that point. And --

7 Q Okay. Okay. And there's a no-go
8 nipple both at the depth of the choke and at
9 the depth of the subsurface safety valve,
10 then?

11 A Yeah. It -- actually, the -- a
12 choke is similar to a plug, and it actually
13 sets inside of the no-go nipple. They're --
14 it's not run in with the tubing that the XN
15 no-go nipple is run in. The bottom hole
16 choke is similar to a plug. Rather than
17 being fully plugging, like a plug, it's got a
18 small hole in it that allows the well to
19 be -- flow at a different rate, depending on
20 the size of the hole. So -- so the choke can
21 be pulled and removed.

22 Q Okay. I think, just to -- to
23 clarify, the -- I think what your testimony
24 is is that the no-go nipple is at what's
25 shown on this sketch as 8472 feet deep. Is
26 that right?

27 A Yes.

28 Q And is there a no-go nipple also at

1 the depth of 8451 feet, shown as the depth of
2 the Camco subsurface safety valve?

3 A There is another profile there.
4 It's typically not called a no-go nipple, but
5 it -- it really does the same thing for tools
6 that would fit through the tubing, but be
7 larger than the 2.313, which the -- the
8 actual valve itself would -- would fit in
9 that nipple, the subsurface safety valve, to
10 my -- to my knowledge, of the -- the way the
11 system works. When running the valve,
12 similarly to running a plug, the operator has
13 to have some way to know where -- where it's
14 located and where it stops, and -- and it
15 would stop on that 2.313 profile. It's
16 typically not called a no-go nipple, though.

17 Q Okay. Thank you for the
18 clarification.

19 If we could look at the depth, if
20 you see, moving over to the left-hand side,
21 the depth of 8585 feet, do you see that
22 marking there?

23 A Yes.

24 Q Is that the depth of the shoe of
25 well SS-25?

26 A It -- I would say, "Yes," as it's
27 drawn right at the shoe, and I recognize the
28 shoe as being that triangle that's filled in

1 solid. That's -- that's what typically
2 denotes the shoe. And the depth is opposite
3 that, so I would expect 85 -- 85 to be the
4 depth of the shoe.

5 Q Okay. On the -- okay. And I think
6 we covered the Otis XN. Maybe just to
7 clarify, to be sure I understood it, at
8 8472 feet, you see "Otis XN"?

9 A Yes.

10 Q And what is that?

11 A So Otis is the manufacturer of
12 this -- what we've called the no-go nipple.
13 It's -- the model, the type is a -- it's
14 called an Otis XN.

15 Q That's the type of no -- no-go
16 nipple. Am I tracking right?

17 A Yes.

18 Q Understood. Okay. And just below
19 that, it says, "8472 feet BH choke," with a
20 space next to it.

21 So what does -- maybe if you could
22 explain. I think you mentioned the choke
23 before. But, could you explain what that
24 means?]

25 A Yes, the choke -- when the field is
26 at high pressures, basically full and --
27 actually most of the pressure range in the
28 field -- the flow rate of the well can be

1 controlled by the BH choke, which stands for
2 bottom-hold choke. And in a bottom-hold
3 choke, it takes a wireline operation to run
4 this particular choke, which is -- which is
5 basically a disk with a hole in it. And it
6 set downhole, bottom hole as opposed to being
7 at the surface.

8 Q Okay. Just below that marking you
9 just discussed, you see S4 shown at 8487 feet
10 alongside the tubing?

11 A Yes.

12 Q Is that the same S4 sand -- is that
13 S4 referring to the same S4 sand that you
14 testified to earlier?

15 A Yes.

16 Q Okay. So that's the depth of the
17 S4 sand, correct?

18 A Correct.

19 Q Okay. And you also mentioned the
20 tubing details, and I think we found that
21 too. So bear with me a second. Let me just
22 ask you one more follow-up or two perhaps.
23 So these rectangles in the 1979 diagram that
24 we're looking at here that you explained, and
25 I appreciate your insight on that, inside the
26 tubing, how are those symbols, those
27 rectangles different than the triangles that
28 you identified as profiles or shoulder in the

1 SS-25 diagram on page 2 of your opening
2 testimony?

3 A They are the same. I used a
4 different representation --

5 Q Okay. Okay. Understood.

6 A Yeah.

7 Q Thank you. Okay. With that, let's
8 go to Exhibit SED-299. And the title page --
9 the top of the title page heading says, "1976
10 tubing detail." And if we go to the next
11 page, we see the Bates
12 No. AC_CPUC_DR_27_0004227. And if we scroll
13 to the top -- actually, let me just ask you
14 about that Bates number. This one -- that
15 actually follows the Bates number on the 1979
16 sketch that we just looked at which ended in
17 4226. And this is my understanding when we
18 looked at it. So the reason I mention those
19 here is does it make sense that this document
20 would accompany the well sketch in the
21 SoCalGas records?

22 A No. The well sketch -- the
23 schematic was drawn in 1979. I would expect
24 that the well schematic would be after the
25 '79 tubing detail, but it's hard to know
26 without looking at the well file because the
27 well file has different -- different folders
28 and clasps. So it's hard to say -- I could

1 tell you where I would expect to see the
2 schematic in the well file.

3 Q Please.

4 A And I would expect to see the
5 schematic after -- that was drawn in 1979 to
6 be after -- to be on top of the 1979 workover
7 and the tubing detail. This is the 1976
8 tubing detail.

9 Q This is the 1976 tubing detail.
10 Understood. So in this case, since the Bates
11 numbers are the same or that they are in
12 sequence -- excuse me -- do you understand
13 why there's a sequence between the 1976
14 tubing detail and the 1979 sketch?

15 A Why they are next to each other?

16 Q Yes.

17 A I don't know.

18 Q Okay. So let's look at the tubing
19 detail beginning -- if you scroll down to No.
20 10 slightly. Thank you. And if we read down
21 the list, I'm going to ask you to explain
22 what each term means here. So starting at
23 No. 10, "D-S nipple 1/2 inch HYD. Control
24 line, SCI safety." What does that mean?

25 A Starting to get a little outside my
26 comfort zone. I mean, I haven't personally
27 run these systems. So I'll -- I can tell you
28 that the D-S nipple with the control line is

1 part of the safety system. In fact, it looks
2 to me like line 10 is the entire safety
3 system.

4 Q And the safety system meaning the
5 subsurface safety valve?

6 A Yes. The valve that really is the
7 housing, and the valve is run after the
8 housing is run.

9 Q Okay. And No. 11, moving down, we
10 see "1-20" -- I think that's a foot symbol --
11 "blast joint (Camco)." Did I read that
12 correctly?

13 A Yes. That would be one 20-foot
14 section of a blast joint --

15 Q Thank you. Pardon me for
16 interrupting. Thank you. What does that
17 mean?

18 A So blast joint is a section of
19 tubing that is a little thicker wall than
20 normal tubing, and it accommodates a
21 turbulent flow at the -- in the vicinity of
22 the crossover ports.

23 Q Okay. No. 12, "No-Go nipple. 1.81
24 inch I.D. (Camco)." Is that referencing the
25 No-Go nipple that you described to us when we
26 looked at the 1979 sketch?

27 A Well, this would be -- since it's
28 done after the '76 workover, this would be

1 what was installed in 1976, you know, keeping
2 in mind there was a 1979 workover that
3 installed a different tubing string.

4 Q Okay. So is this the same No-Go
5 nipple or a different one?

6 A It would be a different one.

7 Q So this No-Go nipple is shown at a
8 depth of 8470.33 feet; is that correct?

9 A Yes.

10 Q And is that depicted by the
11 triangles in your opening testimony?

12 A It's -- well, my opening testimony
13 depicts the 1979 tubing detail. So -- and
14 that was my intention, to depict what was in
15 the well in 1979. This particular tubing was
16 in the well from 1976 to 1979 at which time
17 it was completely replaced.

18 Q I see. Okay. Moving to No. 13, I
19 assume from your earlier reading, this is one
20 10-foot section of blast joint; is that
21 right?

22 A Yes.

23 Q But as indicated by the depth, it's
24 a different section. So is that also right?

25 A Yes.

26 Q Okay. I think we have enough. So
27 let me just ask you do any of the details
28 here indicate the location of the crossover

1 ports?

2 A In this particular detail, the
3 crossover ports would be in the item No. 10
4 if it's the safety system. I think it's
5 scrolled down. And I don't know if they are
6 graphically illustrated or not. Sometimes
7 they are not.

8 Q Go ahead. Sorry. I didn't mean to
9 interrupt. Just wanted to -- follow me -- if
10 you follow Mr. Zarchy, where do you want to
11 go, Mr. Neville?

12 A Yeah. The item is No. 10, the
13 safety system. So if you could scroll down
14 the graphic on the left. Okay. That's good.
15 So I just wanted to check the graphic. They
16 are not shown in the graphic, the crossover.

17 Q Right. Okay. All right. I'd like
18 to ask a different line of cross and, in
19 particular, a series of questions about
20 SoCalGas recordkeeping practices. And we had
21 heard the testimony of Mr. Healy with regards
22 to some of this, and SoCalGas counsel, I
23 believe, who was representing Mr. Healy
24 deferred to you, Mr. Neville, during the
25 cross-examination of Mr. Healy. So if we
26 could -- first of all, let me just clarify.
27 This is a question with relation to the
28 scanners of the certain well files in Mr.

1 Healy's testimony. And I believe that you
2 discuss -- you reference to Mr. Healy's
3 testimony as well.

4 So first let me just ask you, with
5 that introduction, are you aware that Mr.
6 Healy deferred to you -- or SoCalGas counsel
7 deferred to you with regards to certain of
8 the scanning practices of the SS-25 well
9 files?

10 A I'm not a -- I'm not remembering,
11 but I don't -- I won't doubt -- I won't doubt
12 that.

13 MR. LOTTERMAN: Your Honor, I have a
14 different recollection as to what the witness
15 said. I would suggest that Mr. Gruen probe
16 Mr. Neville's firsthand knowledge and leave
17 it at that versus trying to link it to
18 something that some other witness said four
19 weeks ago.

20 MR. GRUEN: We'll try to work with
21 that, your Honor. No concerns.

22 Q Let's go to your testimony, which
23 is SoCalGas -- Exhibit SoCalGas-15. And if
24 we could go to page number -- with Bates No.
25 15.0006. And I'll wait for the
26 screen-sharing, Mr. Neville. If you'd also
27 let us know when you get there on your copy.

28 A Okay. I'm here.

1 Q So lines 18 through 21, if you can
2 go there, and there you say, in lines 18
3 through 21:

4 As discussed in Chapter IX
5 (Healy), it appears that these and
6 other records were provided by SED
7 to its witness in a manner that
8 does not reflect the organization
9 and accessibility of the
10 electronic hardcopy records
11 maintained by SoCalGas.

12 Do you see that?

13 A Yes.

14 Q So just clarification question with
15 that. Since you reference Healy, are you
16 relying on Mr. Healy to discuss the scanning
17 of the records that were provided to SED?

18 A I am relying on Mr. Healy -- the
19 scanning -- I guess we have to look at the
20 entire process of getting the records. I
21 would say, for the most part, I am relying on
22 Mr. Healy. I -- having said that, I do know
23 that a large pdf scanning process where --
24 could not represent the four subsections of
25 the well files and the fact that there's
26 different sections within each subfile.
27 So -- and the particular -- there's no
28 nomenclature on the pdf's, and I -- my sense

1 was that that doesn't really reflect the
2 organization that you see in a hardcopy file.

3 Q Mr. Neville, did you observe the
4 scanning of -- any scanning of well files
5 that were provided to SED?

6 A No.

7 Q Did you supervise any of the
8 scanning of well files that were provided to
9 SED?

10 A No.

11 Q Did you talk to anyone who did the
12 scanning of the well files that were provided
13 to SED?

14 A I wasn't actually -- let me see if
15 I can remember. I did -- I pointed the
16 scanners to the file cabinets because I was
17 working in that office where the well files
18 were located, and I provided the location of
19 where the files were located.

20 Q Okay. So you met the scanners; is
21 that right?

22 A I did meet -- I met the scanners
23 briefly.

24 Q Do you recall their names?

25 A No, I don't. I know they were with
26 a company called I Scan, I believe, or I
27 something. Sorry. I can't recall a name.

28 Q Okay. Is there a record of their

1 name somewhere?

2 A I don't know.

3 Q Okay. Do you know who supervised
4 the scanners?

5 A Which -- they were brought in by
6 legal.

7 Q And who, in particular, handled the
8 supervision of the scanners? What's the name
9 of the person?

10 A I don't recall the name of the
11 individual, but it was someone -- it was an
12 individual with the legal team at Morgan
13 Lewis.

14 Q Okay. How do you know that?

15 A I was called in advance just to --

16 MR. LOTTERMAN: Mr. Neville, if your
17 discussion is with counsel, I believe that
18 would be a privileged discussion. So I would
19 caution you in answering this question.

20 THE WITNESS: I was called by counsel.

21 BY MR. GRUEN:

22 Q Okay. You were called -- I don't
23 want to run a foul on privilege. But I think
24 this is fair game, and I will defer to
25 counsel to say if it's not.

26 You were called by counsel in order
27 to -- who you understood was supervising the
28 scanners?

1 MR. LOTTERMAN: I will object about
2 this question on the grounds that it would
3 reveal privileged communications. I also
4 question the relevance of all this, but I'm
5 not going to press on that. But as to what
6 discussions Mr. Neville had with my law firm
7 or SoCalGas legal counsel in any regard on
8 this is privileged.

9 ALJ HECHT: Objection sustained. I --
10 the fact that there was a call has been
11 established. The details of that call, if it
12 involved counsel, I expect are privileged.

13 MR. GRUEN: Understood. Your Honor,
14 since counsel raised the objection of its
15 relevance as well, may I have an opportunity
16 to respond to that particular part of the
17 objection.

18 ALJ HECHT: Yes. Go ahead. Briefly.

19 MR. GRUEN: I will briefly, your Honor.
20 The relevance as this -- that this goes to is
21 that SoCalGas has stated that the records are
22 organized. Mr. Healy has testified at some
23 length that the records were provided in an
24 organized fashion, but nobody is able to tell
25 us the scanning or the chain of custody that
26 went from the actual hardcopy files to those
27 provided to SED, and SoCalGas is disputing
28 that SED has properly identified the files as

1 disorganized.

2 And so to the extent that we cannot
3 get the names of the scanners or cannot
4 identify the chain of custody, SoCalGas isn't
5 providing that, we can't get to the bottom of
6 whether SoCalGas -- SoCalGas' contention has
7 merit. That's the relevance. With that, I
8 appreciate the privilege of the overruling.
9 I will -- I will move on.

10 ALJ HECHT: I would like to give
11 SoCalGas an opportunity to respond to that
12 since you gave that explanation, if they wish
13 to respond.

14 MR. GRUEN: Yes. Understood.

15 MR. STODDARD: Thank you, your Honor.
16 Yeah. I don't know that it's necessary if
17 we're moving on to address this, but briefly,
18 the point here isn't so much a
19 representation, as Mr. Gruen characterized
20 it. I believe the point of the testimony is
21 that SED does not review when -- their --
22 they have alleged that the well records are
23 not in an organized format in the form that
24 they reviewed it, which, again, was an
25 electronic production. And so you're looking
26 at a single long document that includes, you
27 know, logs of various kinds, which can run on
28 for many, many pages of a pdf.

1 If you look at the well file in the
2 Redwell folder in which it exists and the
3 file components, which I believe Mr. Healy
4 testified to and which Mr. Neville has
5 explained as well, it has a logic to it that
6 is three dimensional, and that's different
7 from a single-page document.

8 The scanners, what they did is not
9 relevant. What we are talking about is the
10 three dimensional format of the document,
11 which is the issue that we've been trying to
12 argue.

13 ALJ HECHT: Thank you for that
14 clarification.

15 Mr. Gruen, do you have a brief
16 response, or do you want to move on?

17 MR. GRUEN: Your Honor, I think we need
18 to depose the scanners and get to the bottom
19 of this. I get counsel's argument, but we
20 don't have the facts in place to know the
21 merits. So we'll -- I'm prepared to ask Mr.
22 Neville some questions that get to some of
23 this, I believe, to the extent he's able to
24 answer. But it seems to me that SoCalGas --
25 there's a concern here that SoCalGas is not
26 providing a witness who can answer questions
27 that go to the organization of the files.

28 ALJ HECHT: Before we get to Mr.

1 Stoddard, I have a more basic question. When
2 did the scanning take place?

3 Yes.

4 MR. STODDARD: I can answer that.

5 MR. GRUEN: Your Honor, if I may,
6 shouldn't the witness be answering that?

7 ALJ HECHT: I would be happy to hear
8 from the witness, but I am asking counsel
9 because it sounds like they
10 organized (inaudible).

11 Please proceed, Mr. Stoddard.

12 MR. STODDARD: Thank you, your Honor.
13 It's my recollection -- you know, subject to
14 check, but it's my recollection that it was
15 in the winter of 2016 around January.

16 ALJ HECHT: All right. Okay.

17 (Interruption by reporter.)

18 MR. STODDARD: I apologize. I am a
19 fast talker on occasion. I will slow down
20 and repeat myself.

21 Subject to check, my recollection
22 and understanding, it was in the winter of
23 2016, I believe, in January, which is
24 during -- you know, while the leak response
25 was ongoing.

26 ALJ HECHT: Thank you. And -- all
27 right. Continue.

28 Mr. Stoddard, I believe you were

1 going to respond.

2 MR. STODDARD: Yes. Thank you, your
3 Honor. Again, this is another instance
4 which, you know, we touched upon a few times
5 where SED is asking for the witness on issue
6 where they have presented testimony, we
7 provide a response to testimony, they've had
8 opportunities for discovery, and they are now
9 taking the next step beyond wanting to test
10 the issues that they've had ample opportunity
11 to conduct discovery on. They filed a motion
12 to compel an appearance of scanners at this
13 hearing, which was denied. They never
14 actually sought a deposition until, I think,
15 two days ago when they folded it into an oral
16 motion to quash, I believe.

17 And again, the time for discovery is
18 over. We're at hearings. So you could
19 cross-examine Mr. Neville to the degree that
20 he -- as your Honors ruled, I believe, in
21 denying that motion to compel, he can test
22 the knowledge of these witnesses on issues
23 that are within the scope of their testimony.
24 To the degree they can't speak to it, it goes
25 to their credibility, and that was clear in
26 your Honor's ruling. And if they can speak
27 to it, then their testimony is in the record,
28 and it's available to Mr. Gruen.

1 If he has, you know, documents he'd
2 like to question about, he can do so, but
3 it's not the time for further discovery in
4 this case. That time is over.

5 ALJ HECHT: And does Mr. Gruen want to
6 respond?

7 MR. GRUEN: I'd like to continue
8 cross-examining the witness. I'm mindful of
9 our process, your Honor.

10 ALJ HECHT: Then let's continue from
11 there. At some point, we will need to
12 revisit what may or may not be a motion to --
13 a new motion to have a deposition or other
14 discovery or something with the scanners, but
15 I agree that that's not a conversation you
16 need to have now.

17 Please go ahead.

18 MR. GRUEN: Thank you, your Honor.
19 Understood.

20 Q Mr. Neville, are you familiar with
21 the chain of custody between the hardcopy
22 well file as it existed during the incident
23 and the electronic version of it that was
24 provided to SED?

25 A I'm not familiar with that chain of
26 custody, no.

27 Q And you understand what I mean by
28 "chain of custody," correct?

1 start our break now coming back at 11:25.
2 We'll be off the record.

3 (Off the record.)

4 ALJ HECHT: We'll be back on the
5 record. While we were off the record, we
6 just took a short morning break. We
7 discussed the schedule for the
8 cross-examination of this witness. It sounds
9 like SED will be wrapping up with this
10 witness before lunchtime, which I encourage.
11 I don't know when exactly we'll take our
12 lunch break, but we typically have been
13 taking it between about 12:15 and 12:30.

14 With that, there had been some
15 questions about scanning and scanners, and
16 there had been an objection. Rather than
17 discussing and repeating that, I will say to
18 witness Neville, please just answer to the
19 best of your ability, as I have said a number
20 of times to other witnesses earlier in these
21 hearings. If the answer is "I don't know"
22 and that's true, then that's a perfectly
23 legitimate answer. So answer to the best of
24 your ability and let's move forward.

25 THE WITNESS: Okay.

26 ALJ HECHT: It looks like everybody is
27 ready.

28 Mr. Gruen.

1 MR. GRUEN: Thank you, your Honor.

2 Q Mr. Neville, similar questions to
3 you. Do you understand what I mean when I
4 refer to the well file for Well SS-25A and
5 the well file for Well SS-25B?

6 A Yes.

7 Q Those are separate well files, each
8 one from each other, as well as from Well
9 SS-25, are they not?

10 A Yes, they're separate files.

11 Q Did you observe the scanning of the
12 well files of Well SS-25A and/or Well SS-25B
13 as they were provided to SED?

14 A No.

15 Q Okay. Did you talk to the
16 supervisor of the scanners of Well SS-25A?

17 A No.

18 Q How about for SS-25B?

19 A No.

20 Q Okay. If we could go to Exhibit
21 SED-257. This says SoCalGas Response to SED
22 Data Request 129 at the beginning of the
23 cover page. If we could go to Bates stamp
24 that's marked SED-257.006 -- actually, before
25 we do that, I want to just lay foundation for
26 this.

27 Mr. Neville, do you recognize this
28 as SoCalGas Response to SED Data Request 129?

1 A Data Request 129?

2 Q Correct.

3 A Yes.

4 Q Okay. If we go now to the page
5 with Bates stamp 257.006, which is shown
6 there, and we go to Question 9 that's right
7 there, we asked, "Did SoCalGas personnel or
8 contractors scan documents in each well file
9 in the exact order as the documents were kept
10 in the hard copy well file?"

11 Do you see that?

12 A Yes.

13 Q And we continue, "If the answer to
14 this question is not an unqualified yes" --

15 No, stay there, stay there, stay
16 where we were on that first page.

17 "If the answer is not an
18 unqualified yes for each well file provided
19 to SED in response to data requests, state
20 exactly how each well file scan differs from
21 the hard copy version."

22 Do you see that?

23 A Yes.

24 Q Continuing on to the next page, we
25 see the response:

26 SoCalGas objects to this request
27 as vague and ambiguous,
28 particularly with respect to the

1 term 'exact.' Subject to and
2 without waiving the foregoing
3 objection, SoCalGas responds as
4 follows. Please refer to
5 Section 5 of SoCalGas' reply
6 testimony, Chapter 9, (Healy).

7 Do you see that?

8 A Yes.

9 Q Now I'll ask you again. Are you
10 aware that Mr. Healy deferred to you with
11 regards to certain questions about the
12 scanning of the well files?

13 MR. LOTTERMAN: Objection, assumes a
14 fact not in evidence, but I'll let
15 Mr. Neville answer.

16 Go ahead.

17 THE WITNESS: If it has to do -- I'm
18 sorry, I lost train of thought. If you
19 wouldn't mind repeating.

20 ALJ HECHT: I believe that the question
21 was whether you knew that certain questions
22 had been deferred by witness Healy to you.
23 Mr. Gruen can correct me if that is wrong, if
24 that is the question. If you have an answer
25 to it, please answer and we'll move on.

26 THE WITNESS: Yeah, I don't recall
27 questions about the scanning.

28 ///

1 BY MR. GRUEN:

2 Q Okay. Understood. If we could
3 turn to another line. And we'll do our best
4 to wrap up so everybody can have lunch here.
5 Let's go to, if we can, your opening
6 testimony, SoCalGas Exhibit-01, page 7, lines
7 21 through 31. If you scroll up. Yeah. The
8 Bates number is SoCalGas-1.0008, and now up
9 to line 21.

10 Thank you, Mr. Zarchy.

11 There you describe in your opening
12 testimony the reporting of underground
13 storage well leaks and repairs of those leaks
14 to DOGGR; is that correct?

15 A I discussed the repair and the
16 reporting of the workovers and the repair of
17 the leaks to DOGGR, yes.

18 Q Fair enough. I appreciate the
19 correction. So this passage describes a
20 process for -- of -- specifically at lines 21
21 through 25, the passage there describes a
22 process for documenting SoCalGas' well leak
23 remediation efforts; correct?

24 A Yes, as it relates to our
25 interfacing with DOGGR.

26 Q Understood. And the passage
27 describes a process for documenting SoCalGas'
28 investigative work related to those leak

1 remediation efforts, would you agree?

2 A Pardon? Could you repeat, please.

3 Q The passage describes a process for
4 documenting SoCalGas' investigative work
5 related to those leak remediation efforts?

6 A As it pertains to the workover.

7 Q Understood. Mr. Neville, is it
8 your position that Blade's root cause
9 analysis and supporting exhibits identified
10 all of the documented well leaks at Aliso
11 Canyon?

12 MR. LOTTERMAN: Objection, I believe
13 that exceeds the scope of Mr. Neville's
14 testimony.

15 MR. GRUEN: Your Honor, I'll try to
16 rephrase.

17 Q Mr. Neville, have you had a chance
18 to review the Blade root cause analysis, any
19 portion of it?

20 A I've reviewed portions of it, yes.

21 Q Have you looked at the portions
22 that identified leaks in the Aliso Canyon
23 field?

24 A I have to -- I have looked at the
25 report, yes.

26 Q Okay. And in your review of the
27 report, could you tell that Blade counted all
28 of the leaks at Aliso, all of the well leaks

1 at Aliso?

2 MR. LOTTERMAN: Your Honor, again, I
3 will repeat that this line of questions was
4 not either in Mr. Neville's testimony or,
5 frankly, in any cross-examination documents
6 that were given to him. I would be very
7 hesitant to let Mr. Neville opine on this
8 issue.

9 MR. GRUEN: Your Honor, may I? I just
10 want to be sure I'm tracking.

11 ALJ POIRIER: Judge Hecht, I think
12 you're muted.

13 ALJ HECHT: All right. Objection
14 sustained. Let's move on.

15 MR. GRUEN: Your Honor, SED did, in
16 fact, provide documentation. It happened to
17 be before the last round of hearings. We can
18 show that. So I'll try to rephrase the
19 question to address that. If we can, let's
20 go to Exhibit 238, SED-238. This is the
21 annual report entitled Annual Report,
22 SoCalGas Response to SED Data Request 16(5).

23 ALJ HECHT: It says "17." I believe
24 you said "16."

25 MR. GRUEN: Thank you, your Honor.
26 Apologies. I'm getting tired. Thank you for
27 the correction.

28 Q SED Data Request 17(5). If we

1 could go down to the first page, this is
2 entitled Southern California Gas, Aliso
3 Canyon Field Annual Review Meeting with the
4 Division of Oil and Gas. If we go to the
5 bottom of that page, the Bates number is
6 AC_CPUC_SED_DR_17_0001027.

7 Mr. Neville, are you familiar
8 with --

9 Could we scroll up, please,
10 Mr. Zarchy, to the title. Yeah.

11 Are you familiar with this
12 document, Mr. Neville?

13 A Yes. Does it have a year? Is
14 there a year on the document?

15 Q I believe there is. If we could
16 scroll down to the next page, let's see if we
17 can find it.

18 MR. LOTTERMAN: I believe it's the top
19 right-hand corner of the page you just had.

20 MR. GRUEN: Thank you.

21 Q If we scroll up to the top of the
22 top right corner, the date shows 1990 there.
23 With that clarification, do you recognize the
24 document, Mr. Neville?

25 A Yes, I do. It was before I started
26 with the company but I do recognize this
27 document.

28 Q Let's turn to the page with Bates

1 Number AC_CPUC_SED_DR_17_0001051. If we
2 could go to that page. There's the Bates
3 number as I just read it.

4 Scroll up.

5 So there we see Table 6, Aliso
6 Canyon Losses Detected and Corrective
7 Measures Taken May 1989 through May 1990.

8 Do you see that?

9 A Yes.

10 Q Okay. If we go to the first entry
11 under the "Well" column, we see there Well
12 SS-7.

13 Do you see that?

14 A Yes.

15 Q "Shoe leak detected in 1989";
16 correct?

17 A Yes.

18 Q There it says, "Well was not killed
19 because rate of leakage is low."

20 Do you see that?

21 A Yes.

22 Q So, Mr. Neville, I want to compare
23 this document and just go through the
24 exercise of comparing a few things from this
25 document to the document that you testified
26 earlier that showed leaks in Aliso Canyon.

27 With that understanding, if we
28 could pull up Exhibit SED-286.

1 ALJ HECHT: We'll be off the record
2 while we find the document.

3 (Off the record.)

4 ALJ HECHT: We'll be back on the record
5 now that we have found the place in the
6 documents.

7 Mr. Gruen, go ahead.

8 MR. GRUEN: Just for the record, this
9 is SED-286, SoCalGas Response to SED Data
10 Request 11, Documents.

11 Q Mr. Neville, do you recall being
12 asked questions about this document?

13 A Yes.

14 Q Okay. Let's scroll down to the
15 next page and rotate and enlarge. This was
16 the document, while we're doing that, that
17 identified the leaks that you and your team
18 worked on to provide SED with the leaks at
19 Aliso; is that right?

20 A Yes.

21 Q If you could, Mr. Neville, just
22 going through this page, which is Bates
23 stamped -- if we could find the Bates stamp
24 and I can read it into the record. Thank
25 you. AC_CPUC_0036138. If we could go to the
26 next page, too, and do the same. It's
27 AC_CPUC_0036139. I'll give you a chance,
28 Mr. Neville.

1 Can you tell me whether on this
2 document and those two pages that you
3 provided there is reference to a leak on
4 Well SS-7?

5 A You'll have to scroll to the next
6 page.

7 Q Sure.

8 A Scroll up. I believe the time
9 frame was 1989 so you'll have to --

10 Q Yes. My understanding was '89
11 through '90. Does that comport with your
12 understanding as well?

13 A Yes. And then -- okay. I want to
14 start checking from 1989. If you could
15 continue then to -- I don't see any repair or
16 identification. Okay. I don't see that well
17 listed here.

18 Q Okay. Thank you. If we could go
19 to Exhibit SED-241. The title page, the
20 first part of the title page, SED-241, Annual
21 Report, SoCalGas Response to SED Data Request
22 17(8). If we could scroll down to the first
23 part.

24 Mr. Neville, do you recognize this
25 document?

26 A Yes.

27 Q Can you briefly describe the
28 document at a high level -- or let me ask it

1 this way: Would you accept -- do you agree
2 that the depiction in the title is a fair
3 characterization -- on the title page is a
4 fair characterization of the document?

5 A Yes.

6 Q If we scroll down to Bates Number
7 AC_CPUC_SED_DR_17_0000706, do you see that in
8 the lower right corner?

9 A Yes.

10 Q Table 6 here is Aliso Canyon Losses
11 Detected and Corrective Measures Taken,
12 May 1988 through May 1989.

13 Do you see where I am?

14 A Yes.

15 Q So here you see shoe leaks
16 identified. I'll ask about Well SS-17 and
17 SS-30. Both of those show shoe leaks; is
18 that right?

19 A Yes.

20 Q Do you see the detection dates for
21 SS-17, November of 1985, and for SS-30, it's
22 1986?

23 Do you see that?

24 A Yes.

25 Q Let me just verify. These are
26 indeed shoe leaks as shown here and the
27 information on here is accurate.

28 Would you agree?

1 A That's the statements made here in
2 this meeting of 1989 that those were
3 identified as shoe leaks at that time, yes.

4 Q And it's a SoCalGas statement;
5 correct?

6 A Yes.

7 Q Okay. Is it an accurate statement
8 to your knowledge?

9 A To my knowledge, it's an accurate
10 statement, yes.

11 Q Okay. Let's go back to
12 Exhibit 286. Mr. Neville, it's the same
13 question; if you could identify for us just
14 on the same page, as we were just looking at
15 on Exhibit SED-286, your leak table that you
16 provided in response to Data Request 11.
17 Could you show us where on this table it
18 shows a leak on either Well SS-17 or Well
19 SS-30? And we'll follow you. You can tell
20 us where you want us to go.

21 A Yeah, it's just so that I can get a
22 bit of review. You would need to scroll up
23 to the next page.

24 Q Sure.

25 A Okay. Right there. I don't see
26 SS-17 or SS-30.

27 Q Okay. Mr. Neville, just with
28 regards to these -- the documents that we've

1 been reviewing, I wonder, the last two
2 exhibits, are those SoCalGas annual reports?

3 A Those would be -- yeah, those are
4 annual reports during the meeting between
5 DOGGR and SoCalGas.

6 Q So SoCalGas is reporting the leak
7 information that we just covered to DOGGR
8 about pertaining to the wells at Aliso
9 Canyon; is that right?

10 A Yes.

11 Q If we could bring up Exhibit 274
12 again. This is estimated well conditions as
13 of 11-10-15. If we could scroll down.

14 Mr. Neville, do you remember
15 discussing this document yesterday?

16 A Yes.

17 Q I wanted to clarify for the record,
18 I believe I may have inadvertently misstated
19 the handwriting at the top. It seems that
20 it's referring to estimated well conditions
21 as of 11-10-15.

22 Would you agree?

23 A Yes.

24 Q Okay. And if we scroll to the
25 bottom of the document, I'll read the Bates
26 number just for identification purposes.
27 It's AC_CPUC_SED_DR_17_0046340. You see
28 right above the Bates number there's a

1 "6-16-86," Mr. Neville?

2 A Yes.

3 Q Does that look like a date to you?

4 A Yes.

5 Q The date of when this sketch was
6 initially produced?

7 A I don't know if that's the case
8 with that date. I don't know what that date
9 represents.

10 Q Do you know when this sketch was
11 produced without the handwriting, when it was
12 initially created, I should say, without the
13 handwriting?

14 A No.

15 Q Okay. Can we scroll to the top.

16 Prior to the hearings and prior to
17 being served, had you seen this sketch
18 before?

19 A The sketch with the writing?

20 Q Let's start with the sketch without
21 the writing.

22 A Yes, I have seen the sketch without
23 the writing.

24 Q Approximately when? When was the
25 first time that you saw it?

26 A I'm trying to recall if it was
27 included with some of the early data requests
28 that I worked on. I don't recall exactly

1 when I saw this particular sketch. I do know
2 I saw it while I was preparing my testimony.

3 Q Okay.

4 Your Honor, I might just flag for
5 this -- let me ask one more question.

6 Mr. Neville, I think that we're
7 pretty close to done, but maybe it's more
8 than one. Without the handwriting, does this
9 sketch pre-date the Aliso Canyon incident?

10 A Yes.

11 Q Okay.

12 Your Honor, I think we may have the
13 classic example of a hybrid document here;
14 that is to say, perhaps the handwriting was
15 created by someone at SoCalGas during the
16 incident while the underlying document seems
17 to pre-date it, as Mr. Neville just
18 testified. What I might request is that we
19 have, just for purposes of crossing on this,
20 we might have both Mr. Neville and
21 Mr. Schwecke available for questions at the
22 time when it's Mr. Schwecke's turn. I think
23 we could do a brief cross on that.

24 I'd ask if counsel to SoCalGas
25 would stipulate to that.

26 ALJ HECHT: Mr. Lotterman.

27 MR. LOTTERMAN: Your Honor, my view is
28 let's take care of Mr. Neville right now. To

1 the extent he knows about the document, let's
2 ask the questions and -- in fact, I believe
3 they were asked yesterday, but we can re-ask
4 them and then let's let Mr. Neville go.

5 I don't know what value there is to
6 keeping Mr. Neville on hold if, in fact,
7 Mr. Gruen basically exhausts all the
8 information or testimony that Mr. Neville has
9 on this document. We can table the issue
10 about Mr. Schwecke. I just don't understand
11 this sort of hybrid,
12 keeping-people-around-for-a-while approach.

13 ALJ HECHT: Mr. Gruen.

14 MR. GRUEN: It's certainly possible
15 that we have exhausted our cross of
16 Mr. Neville, your Honor. The concern I have
17 is I don't know that we have until we get an
18 answer about the handwriting. I guess one
19 option would be that Mr. Neville is available
20 in case we have additional questions that
21 come up because of the answers on the
22 handwriting, but my concern is we're going to
23 need him and so I'm flagging it now. But to
24 Mr. Lotterman's point, at this point, given
25 what we know about the document, we've
26 exhausted our questions of him.

27 ALJ HECHT: All right. I would prefer
28 to finish with this witness now and not kind

1 of leave him hanging with, of course, the
2 caveat that if something comes up that
3 appears clearly to be in his area, he can be
4 recalled at a later time.

5 Is there any objection to that by
6 Mr. Gruen or Mr. Lotterman?

7 MR. GRUEN: No, your Honor, none from
8 SED at this time.

9 MR. LOTTERMAN: None here, your Honor.
10 Thank you.

11 ALJ HECHT: All right. So I will say
12 that you should finish your cross -- you,
13 Mr. Gruen -- should finish your cross with
14 Mr. Neville now. I can't quite tell whether
15 you've finished this line or you've finished
16 entirely. After that, we will take our lunch
17 break, and then we will pick up with the
18 Public Advocates Office.

19 I expect that when Mr. Neville
20 finishes with both cross and redirect, that
21 we will let him go. If for some unlikely
22 reason there is some reason to call him back,
23 we can do that.

24 MR. GRUEN: Thank you, your Honor. I
25 appreciate that. At this time we have no
26 further questions for Mr. Neville. I do want
27 to just thank Mr. Neville for his time. I
28 appreciate that this has been several days

1 and we appreciate him staying with us
2 throughout that time. I know you're required
3 to do so, but thank you for your
4 participation.

5 THE WITNESS: Sure.

6 ALJ HECHT: I actually would also like
7 to thank Mr. Neville. This has been a lot of
8 very technical testimony and I appreciate
9 being walked through it. I think this is an
10 example of why the Commission has
11 traditionally tried to have administrative
12 law judges who have engineering backgrounds,
13 but I am not one of those. So I have found
14 this very helpful and valuable and I just
15 wanted to say that.

16 I know that we will be going back to
17 Mr. Neville this afternoon for the Public
18 Advocates Office's cross and hopefully then
19 redirect.

20 Are there any housekeeping or other
21 issues that people want to deal with before
22 we take our lunch break?]

23 MR. GRUEN: Your Honor, at this time,
24 SED would make a motion in which we would
25 request that SoCalGas be required to produce
26 for deposition both the scanners and the
27 supervisors of the scanners of the well files
28 to SS-25, SS-25-A and SS-25-B. This -- the

1 record is clear that neither Mr. Neville nor
2 Mr. Healy, both of whom were testifying --
3 whose testimony went to the scanning and the
4 merits of the well files that were provided
5 to SED -- neither of them are able to answer
6 questions about it. We showed a data request
7 which showed that we asked SoCalGas questions
8 about the scanners and -- and the documents
9 that were provided to SED. The -- the
10 response referred to Mr. Healy's testimony.
11 In short, we did discovery. We did our
12 diligence. They referred us to the
13 testimony, to hearings, if you will, and
14 SoCalGas witnesses were unable to answer
15 questions. This goes to the dispute that
16 SoCalGas has raised about whether SoCalGas
17 provided SED with organized well files in the
18 form of well SS-25, 25-A and 25-B, all of
19 which are identified as violations in SED's
20 opening testimony.

21 ALJ HECHT: I am assuming that
22 Mr. Stoddard would like to respond?

23 MR. STODDARD: Yes, your Honor. Thank
24 you.

25 Again, this is an issue that was
26 briefed, probably more extensively than we're
27 going to argue it here today. A lot of the
28 arguments for the deposition would be the

1 same as the arguments that are raised in the
2 context of the motion to compel the
3 appearance of the scanners for purposes of
4 hearing. Your Honors correctly denied that
5 motion to compel in that context on the basis
6 that the witnesses are going to be testifying
7 and speaking to their prepared testimony, and
8 are available for cross-examination on that
9 basis.

10 However, separately, SED has had --
11 again, this is -- this isn't discovery, in
12 this instance. This is very different, for
13 example, from the deposition of -- of
14 Mr. Holter that was addressed in the motion
15 for reconsideration, because that was a
16 motion to compel that was filed -- you know,
17 that's been pending dispute since last
18 October. We were pursuing discovery at the
19 appropriate time. SED asked us in data
20 requests on this issue. We actually provided
21 them with the identity of the vendor that
22 conducted the scanning in the course of meet
23 and confer discussions. They had ample
24 opportunity to pursue discovery. They're a
25 third-party, again, and they could have been
26 subpoenaed for a deposition or they could
27 have been requested, they -- they could have
28 propounded third-party discovery on them

1 directly. The scanning occurred -- and they
2 didn't do so.

3 The other issue here is, you know,
4 this is an unusual request to do further
5 discovery of this sort in the middle of
6 hearings, and it should require a higher bar
7 than simply, you know, "We've asked this
8 witness some questions about his knowledge,
9 he can't answer them, and we'd like to ask
10 somebody else who might know the answer." In
11 this instance, you know, the likelihood that
12 this is going to lead to discovery of
13 admissible evidence is actually extremely low
14 because of the fact that this was a vendor
15 working at the direction of counsel that
16 scanned -- you know, individuals working for
17 them scanned these documents amongst -- and,
18 you know, I'm going to say thousands,
19 possibly ten -- hundreds of thousands of
20 other documents in the course of -- of
21 collecting documents for -- for purposes of
22 litigation during the pendency of the leak
23 more than five years ago, and the likelihood
24 that there's any recollection of the SS-25
25 well file, which would have no particular
26 significance to an individual involved in the
27 scanning at that time, is extremely extremely
28 low.

1 To the degree that SED is actually
2 going to get some form of a deposition here
3 or wants to make an argument, they should --
4 they should have to specify the questions
5 that they would plan to ask those scanners,
6 in particular, because, you know, again, this
7 is highly unusual, and I think it would help
8 us assess the likelihood that they would have
9 responsive information, so that we don't
10 spend time conducting a deposition with a
11 third party where the answer to every
12 question is going to simply be "I don't know"
13 or privileged.

14 ALJ HECHT: Thank you. Did we have a
15 response from any other party?

16 Ms. Bone, was that a "Yes"?

17 MS. BONE: Yes, your Honor. It just
18 seems to me that the -- the evidence that --
19 that Mr. Gruen is looking for is directly
20 relevant to violations that are asserted. So
21 to the extent that SoCalGas has not provided
22 answers to these requests, you know, first of
23 all, we should be able to continue to -- to
24 require witnesses to answer questions on
25 these issues, and to do whatever discovery is
26 necessary to get to these violations, to the
27 extent that SoCalGas has been playing a shell
28 game, and pointing to witnesses who now can't

1 answer the question, which is what it appears
2 to me. So we support so -- SED's motion, and
3 there you have it.

4 ALJ HECHT: Yes, Mr. Gruen, and then
5 Mr. Stoddard.

6 MR. GRUEN: Your Honor, Public
7 Advocates has it right. They've captured it
8 correctly. These are percipient witnesses,
9 asking them for what -- we want to know what
10 observations they had. And I would say this
11 is -- there's a greater need to depose these
12 percipient witnesses than Mr. Holter, because
13 these witnesses -- SED was not present to see
14 what these witnesses were doing, and
15 SoCalGas -- we have done discovery, as the
16 record now shows. I don't understand.
17 Counsel made a point before we did our cross
18 that the time to do discovery is over. I
19 disagree with that. I think this is -- this
20 has been a form of discovery during -- during
21 cross-examination. Counsel is not done.
22 Counsel's not done. SoCalGas is not done
23 with their discovery. SED has extremely
24 broad discovery rights under statute.
25 There's nothing that limits those discovery
26 rights here. The time for discovery is
27 absolutely not over. This is an ongoing
28 investigation. The record is not closed.

1 Nobody has told SED at this time that SED
2 cannot pursue discovery. The moratorium is
3 over, as well. We have the opportunity to do
4 it, and SoCalGas has not answered the
5 question about the state of those well files.
6 We asked fundamental questions about the --
7 how they moved from hard copy to electronic
8 and were provided to SED, and none of their
9 witnesses could answer the questions.
10 Somebody should be required to, your Honor.
11 This'll get to the bottom of that.

12 ALJ HECHT: Yes, Mr. Stoddard.

13 MR. STODDARD: Thank you, your Honor.

14 First, to respond to Cal Advocates,
15 for the most part, you know, her
16 characterization that we've been playing a
17 shell game is simply not true. Part of the
18 difficulty with this issue, as with all the
19 issues in this, is that the alleged
20 allegations by -- sorry, the alleged
21 violations by SED are extremely vague,
22 general, and don't lack a lot -- and lack a
23 lot of specifics.

24 In this instance, the allegation is
25 the well files are generally disorganized.
26 Right? And that -- and our response in
27 testimony to that was they were reviewing
28 electronic production version of the well

1 file, which is not a good representation of
2 the organization of the well file. If you
3 look at a red well well file, which they've
4 neither asked to look at, and when we raised
5 the issue, they didn't follow up to ask to
6 look at it, either. After testimony, you'll
7 see that some of these logs, for example, not
8 only as I've described them before, are very
9 very long, and therefore, kind of cumbersome
10 to review in PDF; but they look like little
11 bricks. They're little booklets. And when
12 you stack them, you don't put them
13 necessarily in a particular order, because
14 you know -- an engineer knows where to find
15 them.

16 SED is focusing on the scanner issue
17 kind of as a defense to that argument, and it
18 is -- it's a red -- simply a red herring, and
19 it's really not relevant to the core issue
20 here, which is they've alleged that they're
21 disorganized. They have the version that we
22 produced in the scanned format. And -- and
23 again, what we've argued is you need to see
24 the physical document. Right? You need to
25 see the physical file, which again, they've
26 never asked to look at on some, you know,
27 conspiracy theory that the document was
28 cleaned up and reorganized after the fact,

1 none of this for which they have any evidence
2 of. It's just supposition. Okay?

3 At the end of the day, this is
4 discovery. And I agree with Mr. Gruen that a
5 lot of what's been happening on the stand
6 here throughout this proceeding is discovery.
7 Okay? That is not what evidentiary hearings
8 are supposed to be for. That's not to say
9 that SED doesn't have discovery rights
10 separately; but, for purposes of conducting
11 cross-examination and calling witnesses at
12 hearings, it's intended to be about the
13 testimony that was offered. And in this
14 case, SED has the burden. They offered their
15 testimony. SoCalGas responded to it. They
16 are cross-examining our witnesses about their
17 testimony. At the end of the day, this is
18 just further discovery. And it's not just
19 discovery; it's on an irrelevant -- it's on
20 a -- frankly, a fairly irrelevant issue that,
21 again, is extremely unlikely to lead to the
22 discovery of admissible evidence.

23 ALJ HECHT: And before I continue,
24 Ms. Bone.

25 MS. BONE: You know, I'll just observe
26 that my understanding is that there's a
27 possibility that documents may have been
28 destroyed. There is concern about that. And

1 so, from that perspective, and to the extent
2 that the well files were not provided in the
3 same order as they existed for SoCalGas,
4 these are not irrelevant issues. This goes
5 directly to the issue of, you know, have they
6 been acting in good faith in response to this
7 investigation, which is also another set of
8 violations; so not irrelevant, very relevant,
9 and this needs to be pursued.

10 ALJ HECHT: Yes. Before Mr. Gruen and
11 Mr. Stoddard, I would like to ask the
12 question, and that is Ms. Bone stated that
13 there is concern that documents might have
14 been destroyed. That is a passive voice
15 formulation, and it does not say who has
16 those concerns or what the basis is of those
17 concerns. And I am just noting that I have
18 not seen either of those things. So be aware
19 of that.

20 Mr. Gruen, and then Mr. Stoddard.

21 MR. GRUEN: Your Honor, I would echo
22 Cal Advocates' point about this being
23 directly relevant, and I think we've
24 explained why. I won't belabor the point.
25 But, I -- I have to strenuously object to
26 counsel for SoCalGas -- SoCalGas' statement
27 that there are conspiracy theories here. We
28 have prepared violations that are based upon

1 facts. There is a legitimate violation of
2 law here. They are -- they are articulated
3 clearly. We have explained why the need to
4 depose these witnesses as percipient
5 witnesses, just as Mr. Holter is being
6 allowed to be deposed as a percipient
7 witness. They need to -- to -- to be
8 produced here so that we can get to the
9 bottom of whether the hard copy files --
10 which, by the way, SoCalGas has represented
11 have been provided in the exact same way to
12 SED in electronic format as they existed at
13 the time of the incident; but, we're trying
14 to get to understand if, in fact, that is the
15 case. None of SoCalGas' witnesses can answer
16 that question, and we think that we have a
17 right to answer it. It -- it's directly
18 relevant to the -- the problem that we think
19 and the -- we think the record now shows,
20 which is that SoCalGas' well files for SS-25,
21 25-A and 25-B are all disorganized. And we
22 think this'll help pin that down. We don't
23 have a direct answer yet to -- to that. We
24 certainly don't have witnesses who can answer
25 questions that go directly to that.

26 That's all -- that's all I'll say.
27 I recognize -- I don't want to repeat the --
28 repeat the point, but I think it's critical

1 to drive home. I will say, if I could, I'm
2 not really clear what counsel's stating
3 that -- that we're doing a -- a deposition as
4 a defense to something. We're trying to
5 uncover facts here, because nobody's been
6 able to answer questions. That is relevant
7 discovery. It's necessary to do in light of
8 the fact that the witnesses couldn't properly
9 testify to these questions in hearings.

10 ALJ HECHT: Okay. Briefly from
11 Mr. Stoddard. I think people are getting
12 upset, and that happens. But, we are going
13 to be taking a lunch break pretty soon, and
14 that will give us all an opportunity to cool
15 down after we hear from Mr. Stoddard briefly.

16 MR. STODDARD: Thank you, your Honor.
17 Briefly again, I'm not -- I'm not
18 going to address the comment that Ms. Bone
19 made, because I -- I agree with your Honor's
20 comment that I -- I have heard that before,
21 and I don't believe there's any evidence of
22 even allegation of that.

23 However, separately, I think to
24 help -- and -- and this kind of goes to my
25 point about needing to understand exactly
26 what they would be asking to understand
27 whether this is even necessary. Our
28 witnesses have testified that they thought

1 that the files were scanned in the -- in
2 the -- in the manner in which they were
3 maintained. And now please bear with me. I
4 don't have the testimony in front of me.
5 But, my recollection is that the general
6 statement was they were scanned as they're
7 maintained in the -- in the normal course of
8 business. SED is alleging that, based on
9 their review of the scanned PDF version that
10 was produced to them, they think they're
11 disorganized. All they need to do -- if
12 we -- I mean we've already essentially said
13 that they were scanned -- that they were in
14 the normal course of business. To the degree
15 they believe they were disorganized, they can
16 make that argument based on the version that
17 they reviewed. Right? There's no -- you
18 know, it seems to be that there's a
19 disconnect here, with the idea that the
20 scanners -- you know, again, if they think
21 that the version they're looking at is
22 disorganized, and we've said that that's how
23 it was in the normal course of business, they
24 can make the argument that our files were not
25 maintained in a well organized way in the
26 normal course of business. Again, our
27 argument is slightly different, and it has to
28 do with being able to view the

1 three-dimensional well file, where the logic
2 of the organization is very different, and
3 where even a layperson can make sense of it
4 fairly quickly.

5 And I would note, because I think
6 this is important, that Cal Advocates did
7 come and look at the physical well file in
8 this case, and they took the opportunity to
9 look at it. And what I meant by saying that
10 this is a defense is that I believe, you
11 know, in my view, this is a reaction to our
12 argument that SED did not, and they're trying
13 to create a way to say it doesn't matter
14 when, again, their approach contrasts very
15 clearly with the approach that Cal Advocates'
16 analysts took in this case.

17 That's all I have to say on this.
18 Again, I do think it's important that, to the
19 degree that your Honors are considering this
20 as a serious request that -- that SED should
21 be required to add more specificity to the
22 questions they would plan to ask those
23 scanners so it can be assessed for likelihood
24 to lead to admissible evidence.

25 ALJ HECHT: Thank you. It does --
26 okay.

27 Ms. Bone, you may speak very
28 briefly. I really think that we've heard

1 enough, and we're going to be breaking for
2 lunch very shortly; but, I will not cut you
3 off.

4 MS. BONE: I understand. Thank you,
5 your Honor. I just -- since Cal Advocates
6 was mentioned by name, and what they did, I
7 will just be clear that the review of the
8 well files was not comprehensive, and I think
9 that the testimony reflects that. It was a
10 spot check of a number of well files, not
11 just the one for SS-25.

12 ALJ HECHT: Thank you. Okay. I have
13 heard enough. We are going to take this
14 under submission. We will come back after
15 lunch, and we will discuss it. And I think
16 that I'll leave it there for now.

17 I hope that everybody has a good
18 lunch break, and we will return at 1:30.
19 Thank you very much.

20 (Whereupon, at the hour of 12:18
21 p.m., a recess was taken until 1:30
22 p.m.)]

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AFTERNOON SESSION - 1:30 P.M.

* * * * *

DAN NEVILLE,
resumed the stand and testified further as
follows:

ALJ HECHT: We'll be on the record.

We are returning from after lunch.
It is Thursday, I believe, the 6th of May.
We -- Safety and Enforcement Division has
finished their cross-examination of
Mr. Neville, and next, we will have
cross-examination by the Public Advocates
Office, and after that, presumably redirect.

There is one outstanding motion for
this morning, and we'll address that first.

To summarize briefly, I think we are
being asked to allow or compel unnamed
employees of a third-party scanning service
so that they can be asked questions about the
ordering contents of one or more large file
cabinets of documents that they scanned five
years ago. Judge Poirier and I have
conferred. We simply do not think that that
appears reasonably calculated to lead to the
discovery of admissible evidence. I could go

1 into more detail on why I think that, but I
2 don't think that I have to, and I would
3 rather not take the time. Everybody's time
4 is precious, and Public Advocates and SED
5 have both made the point that their time is
6 precious. So I would like to just continue
7 with the hearings now.

8 Are there any questions before I
9 hand this off to Judge Poirier? Yes.

10 MR. GRUEN: I'm sorry, your Honor. May
11 I -- I just wanted to clarify. Can -- I'm
12 not sure if I -- if I'm able to be heard.

13 ALJ HECHT: Yes.

14 MR. GRUEN: I just wanted to clarify.
15 I caught the tail end of that, and I
16 apologize for missing it. But, I'm wondering
17 if --

18 ALJ HECHT: The motion --

19 MR. GRUEN: -- that means -- go ahead.

20 ALJ HECHT: The motion is denied. I
21 think that's what you're asking. And the
22 motion is denied. We simply do not think
23 that this is reasonably calculated to lead to
24 the discovery of admissible evidence. I hope
25 that that is clear, and I think we can move
26 on.

27 And Ms. Bone.

28 MS. BONE: Yes, your Honor; just a

1 follow-up on that.

2 While the motion to depose or
3 otherwise cross-examine the scanning people,
4 third-party scanners, has been denied, is
5 there any decision about whether it's
6 appropriate for the parties to ask questions
7 of the witnesses that are being currently --
8 that are currently testifying here about
9 their experience as percipient witnesses
10 regarding the scanning or the status of the
11 records?

12 ALJ HECHT: As you have actually been
13 doing that -- or not you, because you haven't
14 done your cross yet. But, SED has, in fact,
15 been doing that, and you can ask those
16 questions to the extent that you might get an
17 answer. I think this morning is indication
18 of where that's likely to go, but -- but,
19 feel free to ask.

20 MS. BONE: Thank you, your Honor.

21 ALJ HECHT: Thank you. I will then
22 turn it over to Judge Poirier, and we can
23 start the afternoon. Thank you.

24 ALJ POIRIER: Thank you, ALJ Hecht.

25 This is ALJ Poirier. I'll be taking
26 over for the afternoon. I think our next
27 course of business is the cross-examination
28 of Mr. Neville by Cal Advocates.

1 And let's go ahead and turn to
2 Ms. Bone. Please continue -- please go
3 ahead, Ms. Bone.

4 MS. BONE: Thank you, Judge.

5 CROSS-EXAMINATION

6 BY MS. BONE:

7 Q Mr. Neville, good afternoon.

8 A Good afternoon, Ms. Bone.

9 Q And I am sorry that this has gone
10 on for so long, and I don't intend to prolong
11 it. I do have a number of questions for you,
12 but I -- I move fairly quickly. As I say
13 that, I'm reminding myself to talk slow
14 enough for the reporters.

15 So to get straight to the point,
16 you testified on Wednesday that, given your
17 experience, you would know what kind of
18 records a company like Boots & Coots would
19 need to perform the well kill. Is -- is that
20 a correct recollection?

21 A Yes.

22 Q And is it fair to say that you also
23 know what kind of records are needed to
24 properly maintain a gas storage facility?

25 A Yes.

26 MS. BONE: And if Matt Taul could put
27 up on the screen -- is he there? Oh,
28 goodness.

1 I -- your Honor, I forgot. We
2 should go off the record, I think.

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

4 (Off the record.)

5 ALJ POIRIER: Back on the record.

6 Please go ahead.

7 MS. BONE: So Mr. Taul, if you'd take
8 us to page 2.

9 Q Mr. Neville, this is your
10 testimony, which I'm sure you recognize, your
11 reply testimony. It's SoCalGas Exhibit 15.
12 And we're just looking at page 2.

13 And I can barely read it, but can
14 you see it, Mr. Neville?

15 A Yes.

16 Q And you testify there, on lines 4
17 and 5, that SoCalGas' recordkeeping practices
18 provide an efficient means for the operation
19 and maintenance of the Aliso Canyon gas
20 storage facility, and did not cause unsafe
21 conditions. Is that correct?

22 A Yes.

23 Q And that is essentially a primary
24 driver of this particular testimony, is it
25 not?

26 A I would say that, yes, the primary
27 driver is to -- is to explain the
28 recordkeeping in -- in this reply testimony.

1 Q Okay.

2 A Yes.

3 Q And your testimony on that page, if
4 you look further down at around line 20, the
5 heading says, "SoCalGas' well records are
6 organized and maintained to allow for the
7 efficient operation and maintenance of the
8 Aliso Canyon facility by storage personnel."
9 Is that -- is that right?

10 A Yes.

11 ALJ POIRIER: Excuse me.

12 MS. BONE: So the --

13 ALJ POIRIER: Sorry to interrupt. This
14 is ALJ Poirier.

15 Mr. Taul, could you zoom in a little
16 bit? It's quite hard to read -- read the
17 text.

18 ALJ HECHT: This is Judge Hecht. I
19 would appreciate that. I -- even wearing the
20 correct glasses, I cannot discern the words.

21 MS. BONE: It's still not big enough,
22 Mr. Taul.

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

25 (Off the record.)

26 ALJ POIRIER: Back on the record.

27 BY MS. BONE:

28 Q Okay. So -- so, Mr. Neville, you

1 testified to the fact that the well records
2 were organized and maintained to allow for
3 efficient operation. Correct?

4 A Correct.

5 Q Did you use the well file -- files
6 yourself?

7 A Yes.

8 Q How often did you use them, can you
9 estimate?

10 A Yeah. I've probably -- would use
11 them several times a week for various wells,
12 routinely.

13 Q And what did you use them for?

14 A Oh, various practices regarding
15 monitoring. I guess, for an example, would
16 be an anomaly on a temperature survey. I
17 would go to the well file, I would review
18 previous temperature surveys, I would review
19 the well history file to look at the previous
20 work done on the well, the well schematic,
21 and potentially, the well log file to sort
22 out certain anomalies. That -- that's one
23 example.

24 Q That -- that's fine. Thank you,
25 Mr. Neville. That's helpful.

26 So is it safe to say that you have
27 a good sense of how the well files were
28 organized?

1 work, the drilling and workover engineers and
2 the well site managers would access the well
3 files to look at the previous work done in a
4 well in order to plan their work for their
5 upcoming workover.

6 Q So let's talk specifically about
7 the SS-25 well. Do you know if people other
8 than the Aliso Canyon storage personnel were
9 accessing the SS-25 well after the incident
10 occurred?

11 A I don't know.

12 Q So Mr. Neville, you testified
13 earlier today that you know that scanners
14 accessed those files; is that correct?

15 A I do know that they accessed the
16 well files that were located in the
17 drawers -- in the cabinets that were near the
18 office that I was working in, yeah. So the
19 scanners accessed them, yes.

20 Q And do you know if other people
21 accessed them other than the scanners?

22 A Let's see. So the scanners, as I
23 said, drilling and workover people, myself
24 and others that were responding to data
25 requests.

26 Q And who would those people be?

27 A I had help with a contracting
28 company as well as some engineers that were

1 working in the field at the time that --
2 SoCalGas engineers.

3 Q So you mentioned -- you seem to
4 suggest that there are well files that are in
5 these file cabinets. Were there other well
6 files available as well for SS-25?

7 A Well, the SS-25 well file wasn't in
8 a well file cabinet.

9 Q Where was it?

10 A I don't know for myself.

11 Q Was it in the well file cabinets
12 before the incident?

13 A It was a file that I recall being,
14 yes, in the well file before the incident. I
15 can't say exactly the last time I used the
16 file, but I was in -- into -- I would have
17 noticed if the well file wasn't there. If a
18 well existed in the field, didn't have a well
19 file associated with it, I would have known
20 about it. And so to -- with that knowledge,
21 I know that there -- that the SS-25 well file
22 was in the well file prior to the incident.

23 Q Is it reasonable to assume that
24 every well would have a well file in the
25 cabinet prior to the incident?

26 A Yes.

27 Q So do you have any idea when the
28 well file was removed?

1 A I don't -- I have -- I would have
2 to make a guess that I don't have an idea of
3 when, no.

4 Q So you use the well files on a
5 regular basis, more than weekly, several
6 times a week, correct?

7 A Yes.

8 Q And you would have noticed if a
9 well file was missing, correct?

10 A I don't -- you know, I'm not into
11 the well file -- every well file every week.
12 So I wouldn't particularly know if one were
13 missing on any particular -- I wouldn't know
14 when.

15 Q Do you know who would know when the
16 SS-25 well file was removed from the cabinet?

17 A It's -- it's my suspicion that the
18 well file was removed by those that were
19 addressing the incident. But I don't -- I
20 didn't have a conversation with them. That
21 would be my suspicion. It's something that I
22 would expect, if they were addressing the
23 incident, that they would want access to the
24 well information. So --

25 Q And --

26 A I assumed that they had -- I
27 assumed that those that were addressing the
28 incident had the well files.

1 Q And are you assuming that those
2 people were SoCalGas employees?

3 A Yes.

4 Q And specifically who would that be?

5 A Well, those responding to the leak,
6 they would be -- and this is -- I don't know
7 for sure who, but those that were responding
8 to the leak were Todd Van De Putt, Bret Lane,
9 Rodger Schwecke, Boots & Coots.

10 Q And have the -- to your knowledge,
11 have the SS-25 well files ever been put back
12 into the cabinet?

13 A No. They have not been put back in
14 the cabinet.

15 Q Do you have any reason to believe
16 that any of the records from the SS-25 well
17 file were removed or destroyed after the
18 October 23rd, 2015 incident?

19 A I have no reason to believe that.

20 Q And what about before that date,
21 were records ever destroyed, to your
22 knowledge?

23 A To my knowledge, no.

24 Q Do you know what well file records
25 were provided to Boots & Coots?

26 A I don't.

27 Q Do you know what well file records
28 were provided to Blade?

1 A I don't.

2 Q And do you know what well file
3 records were provided to Cal Advocates?

4 A I don't.

5 Q So Mr. Neville, you're the
6 reservoir engineering manager in integrity
7 management and strategic planning for
8 SoCalGas, that's correct, isn't it?

9 A Yes.

10 Q And you've held that position since
11 June of 2012, correct?

12 A Yes.

13 Q I have a hard time remembering.

14 A Yeah. I'll have to qualify that.
15 It was -- I was in storage engineering -- I
16 had the same title in two or three different
17 departments, if that helps. I could try to
18 expand on that, if you'd like, but I'll --

19 Q You don't --

20 A I don't know. Okay.

21 Q Can you briefly explain what
22 integrity management is?

23 A Integrity management is the
24 management of the risks and hazards and
25 mitigation and preventive measures taken to
26 address the threats to the storage operation
27 underground.

28 Q And your work again has primarily

1 been on underground storage on behalf of
2 SoCalGas, correct?

3 A Yes.

4 Q And even before that you have a
5 fairly extensive resume regarding underground
6 storage; is that correct?

7 A Yes.

8 Q Can you briefly explain what
9 strategic planning is?

10 MR. LOTTERMAN: Can you give him a
11 context, Ms. Bone.

12 MS. BONE: Yes, it was in the context
13 of that's his title. He's an engineering
14 manager in integrity management and strategic
15 planning. So from that perspective.

16 MR. LOTTERMAN: Thank you.

17 THE WITNESS: Yeah. That's the name of
18 the department that I'm in. There's other
19 managers and a director. I don't know if I
20 feel that comfortable saying what strategic
21 planning is.

22 BY MS. BONE:

23 Q So you would say that your primary
24 responsibility is integrity management?

25 A I would say that's correct.

26 Q Okay. And if we look at page 2 of
27 your opening testimony, SoCalGas-1.

28 Mr. Taul, if you could bring that

1 up, and we can see the diagram of SS-25
2 that's provided there. And I know it's hard
3 to read on the screen.

4 Mr. Neville, do you have a hardcopy
5 of it in front of you so that you can see it?

6 Matt, you can try and blow it up as
7 much as possible maybe just for the title and
8 the --

9 A Yes. I have a copy in front of me
10 too.

11 Q Great. Thank you, Mr. Neville. So
12 what was the purpose of including this
13 diagram in your testimony?

14 A The purpose was to try to provide a
15 depiction of what the subsurface piping
16 existed of for the well.

17 Q So do you think that it was
18 important to making the points in your
19 testimony?

20 A I do. Yes.

21 Q So looking at the hardcopy you
22 have, can you read for me the title of the
23 diagram there at the top.

24 A Well Standard Sesnon 25, API No.
25 04-037-00776-01. Is that what you're asking?

26 Q Yeah. And I'm wondering if you
27 could read the text that's on the right-hand
28 side in the corner there. It looks like

1 "operator."

2 A Yeah. "Operator: Southern
3 California Gas Company. Lease: Standard
4 Sesnon. Field: Aliso Canyon. Status:
5 Active gas storage." Then there's -- there's
6 the base of fresh water with the acronym BFW,
7 and then there's the USDW, which stands for
8 underground stor -- underground source of
9 drinking water, I believe, subject to check.
10 Then there's the ground elevation, which is
11 somewhat difficult to read.

12 Q So I was beginning to wonder if you
13 had a different version than I have because I
14 can't read this document. And I'm wondering
15 do you know who created this diagram?

16 A It was created by a company called
17 InterAct, which is noted. They are a
18 contractor that we use to build our wellbore
19 diagrams. The company is in blue on the
20 diagram. I think one of the issues here is
21 that the diagram was created on a -- at
22 least, to me, it looks like the diagram was
23 created on a full page, and it was shrunk to
24 fit on a half page. And I think that perhaps
25 may be a problem here with -- the words are
26 so -- they are smaller -- or harder to read.

27 Q It kind of defeats the purpose.
28 Would you agree?

1 A Well, to the extent -- obviously,
2 if the information is hard to read, it's not
3 helpful, yes.

4 Q Do you know who provided the
5 diagram of this testimony to -- this diagram
6 to be included in your testimony?

7 A No.

8 Q Do you know when it was created?

9 A It was created some -- in the some
10 weeks prior to the due date of the testimony,
11 and you know, I believe it was the legal
12 department that inserted this document into
13 the testimony.

14 Q So this morning it looked like --
15 that SED-298, an exhibit that they put in
16 front of you, has this similar document and
17 that this was a -- no, I don't think that's
18 it, Matt, but don't worry about it.

19 So this is a current schematic, not
20 one from like 1979, correct?

21 A Yes.

22 Q Okay. And do you believe it's
23 accurate?

24 A Yes, I do.

25 Q So do you believe that it's
26 complete?

27 A I think it was -- I believe that
28 it -- that there -- information that is on

1 the schematic was sufficient to my testimony.
2 I'm not going to say it includes all of the
3 information on a typical wellbore schematic,
4 but it was complete enough to help understand
5 the written testimony, in my mind.

6 Q Okay. So there has been some
7 discussion over the last few days about
8 crossover ports, and I believe that you
9 testified that there were crossover ports on
10 SS-25?

11 A Yes.

12 Q Are they depicted on this
13 schematic?

14 A They are not depicted.

15 Q And they are an important component
16 of the well; is that correct?

17 A Yes, I would say.

18 Q It's a sub -- a subsurface
19 component of the well?

20 A Yes, they are. Yes.

21 Q So why would they have not been
22 included in this schematic?

23 A I think I provide reference in the
24 testimony to the depth -- it's -- there
25 wasn't an intentional reason not to include
26 them. I think the -- I think the schematic
27 had the major components that I did want to
28 depict, which was the surface casing, the

1 production casing, the tubing, the packer and
2 such. So it's hard to make the decision, I
3 guess, on, you know, what I should have or
4 should not have included. I did, I guess,
5 what I thought best to try to give an
6 illustration of the substructure of this
7 well.

8 Q So I believe you testified this
9 morning that those ports weren't included in
10 this diagram but that they would have been
11 included in a tubing detail; is that correct?

12 A Yes.

13 Q And do you know if that tubing
14 detail was ever included in other schematics
15 provided in this proceeding?

16 A I -- I don't -- so a tubing detail
17 is different from a wellbore schematic. So
18 what we're looking at here is a wellbore
19 schematic, and I -- we talked about the 1979
20 wellbore schematic. A tubing detail is
21 another document altogether that accompanies
22 the -- the drilling and workover history that
23 was -- that was done on the well. There
24 would be a tubing detail after each workover.
25 You know, it would be part of that workover
26 record.

27 Q And would that kind of information
28 be useful to Boots & Coots, that tubing

1 detail?

2 A I -- yes. I -- you know, that's my
3 best assessment as to whether or not it would
4 be or wouldn't be. Yes, I believe it would
5 be.

6 Q Why do you believe it would be?

7 A It shows -- it just shows more
8 details than this schematic. It shows the
9 crossover ports. It shows the length of the
10 different components in the tubing.

11 In fact, if you were trying to kill the
12 well, wouldn't you need information of that
13 type?

14 A Need -- I don't -- I don't know if
15 I would -- I think that what's here is -- at
16 least for a routine well kill that, you know,
17 I'm familiar with, I think the components are
18 there. Well, not this schematic. This was
19 for the testimony. The schematic for the --
20 was -- that we've seen before in 1979, I
21 think, it's sufficient.

22 Q Okay. Can you tell me if SoCalGas
23 would have had in its well file any single
24 diagram that shows all of the subsurface
25 components of the operational wells at Aliso
26 Canyon? Or you had another word for it.
27 It's not a diagram but the tubing detail.
28 What was the other term you used for the

1 tubing detail?

2 A I think that's the term I used was
3 the tubing detail.

4 Q Okay. So would the -- let me
5 restart that.

6 Would the well files all contain
7 up-to-date tubing details that show all of
8 the components of the subsurface components
9 of the well?

10 A I would say yes. You know, that's
11 the practice. I would say that that would be
12 the case. They would either be in the
13 hardcopy well files or in Wellview for some
14 of the more recent work that was done.

15 Q So would that have been one diagram
16 or -- tubing detail, or would it be several
17 pieces of paper or screens?

18 A Typically it's one sheet of paper.

19 Q Mr. Neville, for the well file
20 records to be useful to you in your job as an
21 integrity management person, do you believe
22 that such records need to be accurate?

23 A Yes.

24 Q Do you believe that those records
25 need to be complete?

26 A Yes.

27 Q Do you believe that those records
28 need to be organized and in a manner that you

1 can easily access them?

2 A Yes.

3 Q Has, to your knowledge, SoCalGas
4 taken steps since the incident to create
5 diagrams showing all of the subsurface
6 components of the operational wells at Aliso
7 Canyon?

8 A Are you asking me post-incident?

9 Q Post-incident.

10 A Yes, I am aware of that. Yes.

11 Q And prior to the incident, did such
12 records exist?

13 A Yes, the records existed.

14 Q And where did they exist?

15 A So by "records," I'm talking about
16 the workover histories that are used to
17 generate a depiction that we're looking at.
18 It's a wellbore diagram. So those records
19 existed in the well file.

20 Q Including Wellview, correct?

21 A Including Wellview.

22 Q Right. Mr. Taul, if we could go to
23 page 4.

24 In your opening testimony, you
25 explain that as of October 22nd, 2015 -- and
26 this would be -- yeah, at around line 6 you
27 can see there -- active UGS wells at Aliso
28 including SS-25 were subject to a systematic

1 well integrity monitoring and inspection
2 program.

3 Do you see that?

4 A Yes.

5 Q I have a few clarifying questions
6 about this testimony, and you list a number
7 of activities that were performed on a
8 weekly, monthly and annual basis after that;
9 is that correct?

10 A Yes.

11 Q So I'm unclear on the language that
12 you use "as of October 22nd, 2015." Did this
13 program that you're describing start on
14 October 22nd, 2015, or had it been in
15 existence up to that date?

16 A It has been in -- I guess the
17 reason that date was used was to try to
18 demonstrate -- this was the practice as of
19 the date prior to the incident. So it
20 existed -- this practice existed before that
21 date. It didn't start on October 22nd, but
22 this was the practice that was in place on
23 that date.

24 Q And that practice included all the
25 inspections that you describe in the text
26 that follows, A, B, C, D, E and F on pages 4
27 to 6. If its helpful, Mr. Taul can scroll
28 you through it, or you can look at your

1 hardcopy. So this procedure or this program
2 that you're describing would have included
3 all of these things?

4 A Right. That was a program in place
5 as of that time. At that time period, this
6 was the practice.]

7 Q And what was the name for this
8 program?

9 A The summation of all those, A
10 through F, that would be the monitoring
11 program.

12 Q So was this the program that's
13 referred to as SIMP, S-I-M-P, the Storage
14 Integrity Management Program?

15 A No.

16 Q So this was just referred to as the
17 monitoring program?

18 A Yeah. It was the Aliso Canyon well
19 monitoring program. I don't know if we had a
20 formal name to it. There were all these
21 activities associated with monitoring.

22 Q I understand that there was a pilot
23 program called a SIMP, which stood for
24 Storage Integrity Management Program.

25 When was that put in place?

26 A Yes. I didn't include that in my
27 testimony. The pilot -- for one reason, I
28 wasn't involved with the pilot program for

1 SIMP, but my recollection was that it was in
2 2014 or early 2015 subject to check. The
3 pilot program was started before the
4 incident.

5 Q But you're the integrity management
6 person for the storage facility; correct?

7 A I am now. At the time I was not in
8 2015.

9 Q Oh, what were you doing in 2015?

10 A I was in a different group
11 altogether. I was in a group called Storage
12 Asset Management, which was a group outside
13 of underground gas storage.

14 Q So who is the person who testifies
15 about the TIMP -- or the SIMP? Sorry.

16 A I'm not sure. I think that I
17 would -- I'm trying to think of the testimony
18 who covered SIMP. I think it would -- yeah.
19 I don't know.

20 MR. LOTTERMAN: Ms. Bone, would you
21 like me to answer that question?

22 MS. BONE: Yes, Mr. Lotterman.

23 MR. LOTTERMAN: Amy Kitson.

24 MS. BONE: Thank you.

25 Q So I'm a bit confused, Mr. Neville,
26 how you are in a position to testify as to
27 what was in place in terms of integrity
28 management at SoCalGas at the Aliso Canyon

1 facility prior to the incident.

2 A I'm testifying with regard to the
3 O&M practices that were in place prior to the
4 incident. I had started in storage
5 engineering in 1991 and basically had
6 28 years of various positions within storage
7 engineering, including storage engineer at
8 Aliso Canyon. I was the storage engineer at
9 two other fields. I was a drilling and
10 workover engineer. So I have quite a lot of
11 experience in O&M practices so I understand
12 well construction and the monitoring
13 practices that were in place prior to the
14 incident. It just so happened that at the
15 time of the incident I was in another group
16 for about a year or so.

17 Q And as part of that other group,
18 were you accessing the well files?

19 A Not at Aliso Canyon. The work I
20 was doing at that time was in a different
21 storage field.

22 Q So when we talked about accessing
23 the well files previously, what time period
24 was that?

25 A That would be 2007 to about 2014,
26 mid-2014.

27 Q Okay. And this Aliso Canyon well
28 monitoring program that you describe in your

1 testimony at about pages, I think 2 to 6,
2 thereabouts, in your opening testimony, do
3 you consider that to be an integrity
4 management program?

5 A An integrity management program, I
6 would say, would include that plus what has
7 been referred to as API-1171.

8 Q Let's look at Public Advocates'
9 Exhibit 407 at the bottom of the first page.
10 It recites there something from SoCalGas'
11 March 20, 2020, testimony. It was not your
12 testimony. It was Kitson and Hower's, but
13 I'd like your take on this. It says:

14 Prior to 2007, SoCalGas did assess
15 risk as part of ongoing
16 operations, even if it was not
17 documented as a formal risk
18 assessment program. This was
19 consistent with the standard
20 practices of other operators.
21 Second, starting in 2007, SoCalGas
22 had a formal risk assessment
23 program which focused on wellbore
24 integrity management. SoCalGas
25 implemented a 'Replace and
26 Inspect' initiative.

27 Are you familiar with this Replace
28 and Inspect initiative?

1 A Yes.

2 Q Can you confirm that it was started
3 in approximately 2007?

4 A Yes.

5 Q So were you helping to implement
6 this program?

7 A Yes, I started in Aliso Canyon in
8 2007 and so was part of the engineering group
9 that started this type of program.

10 Q Would you consider this to have
11 been an integrity management program?

12 A I guess when you mentioned the
13 integrity management program, you know, I'm
14 envisioning, you know, a comprehensive --
15 every well assessing hazards and risks such
16 as laid out in API-1171.

17 This is an integrity management
18 program, not that it's specific to the wells
19 that we were working on at the time. To the
20 extent that we were -- when we ran -- worked
21 on a well, we were replacing every component
22 that we could in the well and running casing
23 inspection logs. So that is integrity
24 management.

25 Q But integrity management as to an
26 individual well, not as to all of the wells
27 in the field?

28 A Right. These were integrity

1 management programs done on the wells that we
2 were -- we had workover rigs on and had the
3 ability, during the workover, to do this type
4 of work.

5 Q So this was on wells that were
6 already identified as needing work, but the
7 program did not proactively identify other
8 wells that perhaps also needed work?

9 A Not this program, right. This
10 program was -- the 2007 Replace and Inspect
11 was with regard to the wells that we were
12 already working on and, as you said, not
13 the -- all of the wells in SoCalGas'
14 operation.

15 Q Do you know, was this program
16 ended?

17 A No. It really -- the SIMP program
18 picked up this type of management and applied
19 it to all of the wells in the company's
20 operations at all of the storage fields.

21 Q And when did the SIMP program do
22 that?

23 A So as we discussed earlier, there
24 was a pilot project done in 2014/2015 and
25 SIMP started in 2016.

26 Q So at that point, did SIMP then
27 pick up the work that was being done in this
28 Replace and Inspect initiative and it was

1 incorporated into the SIMP as well?

2 A Yes, because the SIMP was on every
3 well and so this work is a subset of every
4 well, so the SIMP program basically took this
5 program over.

6 Q This Replace and Inspect program --
7 were ultrasonic inspections, or USIT, part of
8 the Replace and Inspect program?

9 A Yes.

10 Q And do you know how many ultrasonic
11 inspections SoCalGas ran for each year of the
12 program approximately?

13 A Is this for Aliso Canyon?

14 Q Yes.

15 A I'm thinking it's -- subject to
16 check, I think it was between three and five
17 a year.

18 MS. BONE: Mr. Taul, could you take us
19 to response to Question 3 just so we can see
20 what we've got here.

21 Q These are questions about the
22 Replace and Inspect program that were
23 implemented in 2007. Does this data request
24 even look familiar to you or data response?

25 A Sometimes I -- it looks vaguely
26 familiar.

27 Q Would you have been maybe one of
28 the people who were consulted to answer

1 questions like this about how many Replace
2 and Inspect, you know, programs or -- were
3 USIT -- sorry -- were implemented pursuant to
4 this program?

5 A I could have been, yes.

6 Q Okay.

7 Mr. Taul, if you could put up
8 SoCalGas-153.

9 Mr. Neville, I hope that this one
10 will be familiar to you. It looks like a
11 memo that you wrote regarding the reliability
12 of Vertilog inspections in November of 1991;
13 is that correct?

14 A Yes.

15 Q If we go to the bottom of page 1 of
16 this memo, you wrote:

17 The Western Atlas tool may not be
18 functioning as specified in the
19 Atlas literature. This may be due
20 to --

21 And if we roll onto the next
22 page --

23 -- the inherent characteristic of
24 the tool itself, or to a poorly
25 calibrated tool used on the job.
26 In order to counter this
27 possibility, Western Atlas has
28 decided to have their research

1 group in Houston review the job.
2 Their report will be attached when
3 the work is completed.

4 Do you see that?

5 A Yes.

6 Q And do you recall that memo,
7 Mr. Neville?

8 A I do recall the memo, yes -- or are
9 you asking do I recall the report?

10 Q That's -- you are cutting to the
11 chase. Were you aware that Cal Advocates
12 asked SoCalGas to provide a copy of the
13 follow-up Western Atlas report to it on
14 March 26, 2021, in our Data Request 49?

15 A Yes, I was aware that this report
16 was requested. Yes.

17 Q Okay. And did you help respond to
18 that Data Request 49?

19 A Yes.

20 Q And were you asked if you had the
21 report?

22 A Yes.

23 Q Did you have it?

24 A No.

25 Q Do you know where we might be able
26 to find it?

27 A My recollection is the report was
28 never done. I don't ever recall seeing a

1 report from Western Atlas. I have a lot of
2 recollection of the work I did for this memo
3 and writing the memo and the discussions I
4 had with Western Atlas, but I don't ever
5 recall receiving a report back from them.

6 Q Would you have expected them to
7 send you a report if they had written one?

8 A Yes, I would have.

9 Q And did you ever receive any kind
10 of a memo or any information that resolved
11 this issue of whether the reliability of the
12 Vertilog inspections was due to an inherent
13 characteristic in the tool itself or a poorly
14 calibrated tool?

15 A The representative there that I
16 worked with didn't have an answer and I
17 didn't get a report, to my recollection, so
18 I -- I guess that's all I have to offer. I
19 was disappointed that I never saw a report.
20 I was disappointed in the tool and I was
21 disappointed that I didn't have a report.

22 MS. BONE: Matt, if you could bring up
23 CalPA Exhibit 411.

24 ALJ POIRIER: Ms. Bone, this is
25 ALJ Poirier. I just want to check for the
26 sake of timing the break. How much more
27 cross do you have?

28 MS. BONE: I have a couple more

1 questions to bring this to a close, and then
2 I probably have about another 15 minutes. So
3 I would suggest that we finish this and then
4 take a break and then come back.

5 ALJ POIRIER: Okay.

6 MS. BONE: How's that?

7 ALJ POIRIER: Okay.

8 MS. BONE: So, Matt, if you could go to
9 Response 1. --

10 Q As you indicated --

11 Are we back on the record?

12 ALJ POIRIER: Yes. We never left.

13 BY MS. BONE:

14 Q You indicated that SoCalGas was not
15 able to find a Western Atlas report. Do you
16 have any sense of the kind of reviews
17 SoCalGas would have done to locate this
18 document other than reaching out to you?

19 A I have a sense, yes, that they
20 would have done more than just reach out to
21 me.

22 Q Do you have a sense of what that
23 would have been?

24 A It would have involved searching
25 the scanned records the company had in place
26 for Montebello and the other fields, I
27 suspect. That's my sense for what would have
28 been done.

1 Q So that's your speculation, but you
2 don't know if anything more was done?

3 A Right.

4 Q Do you think it's possible that a
5 Western Atlas report exists in SoCalGas'
6 records?

7 A I don't believe there is a report.
8 I'm very close to being positive that I never
9 received one. This is -- 1991 was a long
10 time ago. As I say, I remember the work
11 done, I just don't remember ever getting a
12 report.

13 MS. BONE: So now is a good time for a
14 break.

15 ALJ POIRIER: Let's make this a
16 10-minute break until 2:41. We'll be back
17 then. Off the record.

18 (Off the record.)

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

21 We are just returning from a short
22 afternoon break. When we left off, Cal
23 Advocates was cross-examining Mr. Neville and
24 will continue. We indicated that we will go
25 to about 3:45 today and allow for any
26 housekeeping.

27 Please continue, Ms. Bone.

28 ///

1 BY MS. BONE:

2 Q Mr. Neville, hello. We're almost
3 over. We're almost done.

4 API-1171, you referred to it as
5 part of an integrity management program; is
6 that correct?

7 A Yes.

8 Q But API-1171 wasn't even adopted
9 until 2015; is that correct?

10 A If I recall, I think it was
11 published in the late part of 2015, which
12 would be September or October.

13 Q So it would have been adopted after
14 publication at some point?

15 A Oh, I see your question. Yes, it
16 was adopted by PHMSA even later than that.
17 I'm not even sure when the date was.

18 Q Okay. But you believe that that's
19 an important component to an integrity
20 management program; is that correct?

21 A I do. I believe it's a, you know,
22 well-thought-out, comprehensive program of
23 integrity management.

24 Q You've testified that the records
25 for Well SS-25 do not show that there were
26 any leaks; is that correct?

27 A Yes.

28 MS. BONE: Mr. Taul, if you could pull

1 up a document that Mr. Neville has seen
2 before, today and yesterday I believe,
3 Exhibit SED-274.

4 Q Do you recall this document?

5 A Yes.

6 Q And it has handwritten notes on a
7 diagram of Well SS-25 that states something
8 to the effect of suspected hole at
9 approximately 500 feet in 7 inches; is that
10 correct?

11 A Yes, I see that.

12 Q Do you have any idea who wrote
13 these notes?

14 A No.

15 Q But this isn't your handwriting;
16 correct?

17 A No.

18 Q Do you think that the reference to
19 7 inches refers to the production casing?

20 MR. LOTTERMAN: Objection, calls for
21 speculation.

22 ALJ POIRIER: Overruled. The witness
23 can answer to the best of his knowledge.

24 THE WITNESS: All right. Let me take a
25 close look at it since it wasn't my writing.
26 "Suspected hole at approximately 500 feet in
27 7 inch." It appears to be the 7-inch casing.

28 ///

1 BY MS. BONE:

2 Q Could it be referring to something
3 else that you can think of?

4 MR. LOTTERMAN: Same objection.

5 THE WITNESS: Yes.

6 ALJ POIRIER: Mr. Neville, just answer
7 to the best of your knowledge. "Yes, no, I
8 don't know" are all acceptable answers.

9 THE WITNESS: Oh, I don't know.

10 BY MS. BONE:

11 Q And do you know whether there was a
12 suspected hole in SS-25 at approximately
13 500 feet?

14 A I don't know.

15 Q So you never became aware of a hole
16 actually being there?

17 A No.

18 MS. BONE: Mr. Taul, if you could put
19 up SoCalGas Exhibit 153 again.

20 Q Mr. Neville, this is your famous
21 Vertilog memo.

22 A Okay.

23 Q You expressed concerns about the
24 use of Vertilog in this memo, didn't you?

25 A Yes.

26 Q If you had learned that the issues
27 were related to a failure to properly set the
28 Vertilog tool, would that have made you feel

1 better about this situation if it had been a
2 calibration issue?

3 A It would have had to have been some
4 report because it was so far off in its
5 finding the wall loss. It was -- it had
6 classified a 60 to 80 percent wall loss
7 feature which never even existed. So
8 it's hard for me to say that it would be a
9 calibration issue it was so far off. But I
10 gave the contractor the benefit of trying to
11 determine, you know, why it was -- why we saw
12 the results that we did and I just never
13 remember even getting a report back from
14 them.

15 Q So other than Vertilog, what other
16 alternatives were available to testing the
17 integrity of SS-25 in the 1990s?

18 A So the Vertilog was a casing
19 inspection tool. There were other casing
20 inspection tools that use the same type of
21 technology. I wouldn't -- I think
22 Mr. Carnahan would probably be best to cover
23 that, but my understanding is that it was all
24 the same type of Vertilog technology.

25 Q And did SoCalGas use any of those
26 technologies to perform tests on SS-25 in the
27 1990s?

28 A No.

1 Q Did it use those tests on any of
2 the wells at Aliso Canyon in the 1990s?

3 A So by tests, you're talking about a
4 casing evaluation tool?

5 Q Yes, a casing evaluation tool.

6 A Yes. So the company did use casing
7 evaluation tools in the 1990s at Aliso
8 Canyon.

9 Q And what were those?

10 A I know in the 1990s they included
11 both magnetic flux type tools and ultrasonic,
12 but I think it would be worth checking the
13 records to get an accurate answer as to
14 exactly what tools were run when.

15 Q Did SoCalGas use other casing
16 evaluation tools on SS-25 in 2000?

17 A No.

18 Q Did SoCalGas use a casing
19 evaluation tool to inspect SS-25 in 2005?

20 A No.]

21 Q Do noise logs detect corrosion in a
22 pipe?

23 A No.

24 Q Do temperature logs detect
25 corrosion in a pipe?

26 A No.

27 Q Do RA tracer surveys detect
28 corrosion in a pipe?

1 A No.

2 MS. BONE: Your Honor, this concludes
3 my cross-examination of this witness.

4 Thank you very much, Mr. Neville.

5 ALJ POIRIER: Thank you, Ms. Bone.

6 I think now we will move to redirect
7 by Mr. Lotterman.

8 And who should have the presenter
9 ball for --

10 MR. LOTTERMAN: Mr. Moshfegh.

11 ALJ POIRIER: Go off the record.

12 (Off the record.)

13 ALJ POIRIER: Let's go back on the
14 record.

15 We're going to be moving to the
16 redirect of Mr. Neville by Mr. Lotterman of
17 SoCalGas.

18 And please go ahead.

19 MR. LOTTERMAN: Thank you, your Honor.

20 REDIRECT EXAMINATION

21 BY MR. LOTTERMAN:

22 Q Mr. Neville, we're in the fourth
23 quarter, if not the two-minute warning, so
24 hang -- hang in here.

25 A Okay.

26 Q Let's -- let's stay with Ms. Bone's
27 SoCalGas Exhibit 153, shall we?

28 A Okay.

1 Q I'm not sure if Mr. Moshfegh has
2 that on his -- on his list.

3 But, could you -- could you tell
4 the -- the judges the context as to -- as to
5 what prompted your writing of this
6 interoffice correspondence in November of
7 1991?

8 A So -- yeah. So I was asked by my
9 supervisor to make a comparison of the
10 Vertilog to -- on a string of casing that was
11 being pulled from the well. It was in a
12 string casing, so we would have a chance to
13 check the Vertilog against a visual on-site
14 surface inspection.

15 Q Was that an unusual opportunity?

16 A It -- it was not -- it -- it --
17 it's unusual in -- in the sense that most
18 casings are production casings, and they're
19 cemented in the well. This happened to be an
20 inner string casing, and it could be removed.

21 Q So could you explain how one is
22 able to remove an inner string casing
23 relatively easily, and -- and not a
24 production casing?

25 A So production casing is -- is
26 cemented in place. It's nearly impossible to
27 remove. Inner string casing is -- it's just
28 hung with -- inside of the production casing.

1 It's -- and it's only landed in a packer at
2 the bottom of the well, so it's removable.

3 Q Okay. And once you removed the
4 inner string on this particular well at the
5 Montebello facility, what did you do next?

6 A So I can -- you know, backing up to
7 that, with the -- the first thing we did was
8 to run a Vertilog through the -- the inner
9 string, and so we got our Vertilog of the
10 inner string while it was in the well, and --
11 and then it came time to pull the -- the
12 inner string from the well, and by that time,
13 I had had the Vertilog analysis results, and
14 the -- the different class IIIs and IVs, you
15 know, I was noting and looking for on -- on
16 the inner string as it was retrieved from the
17 well, and -- and I actually remember being
18 there, and -- and -- and laying the pipe down
19 on -- on the ground, and measuring out where
20 the wall loss features should be, and I
21 remember, on one of them, it was a --
22 supposed to be a class IV feature. It was
23 a -- it was a scratch on the pipe at -- at
24 that point. And it was that that caused the,
25 you know, further investigation into, you
26 know, our questioning Western Atlas.

27 But, then we sent the pipe into our
28 pipe yard, and they have facilities to run

1 the pipe through inspections on -- on -- at
2 surface to -- to check the condition of the
3 pipe against the Vertilog.

4 Q And what is a class IV metal loss?

5 A It's a 60 to 80 percent wall loss
6 feature, if -- and it was external.

7 Q And is it your testimony that when
8 you laid the pipe down alongside the
9 Verti- -- Vertilog results, the Vertilog
10 indicated a 60 to 80 percent wall loss, and
11 all you found was a scratch?

12 A Yes.

13 Q Okay. Were there other kind of
14 false positives observed during this process?

15 A Yeah. I believe there were two
16 class IVs and several class IIIs, and none of
17 which existed.

18 Q What is a class III?

19 A A -- a class III is a -- a 40 to
20 60 percent wall loss feature, again external,
21 in -- in this case. And I think it's in the
22 report. But, none of those were in the range
23 that the Vertilog had estimated; in fact,
24 they were grossly overexaggerated.

25 Q Did the Vertilog tool that you used
26 in November of 1999 miss wall loss that
27 actually was on that pipe?

28 A Only very -- only within a few

1 percentage points. I don't think there was
2 anything over 20 percent. It was -- it
3 slightly underestimated wall loss in this
4 case, but grossly overstated wall loss.

5 Q And who is Mr. R.A. Skultety, the
6 recipient of this interoffice memo?

7 A He was my supervisor at the time.

8 Q Okay. And upon completion of this
9 project in 1999, what was your personal
10 assessment as to the accuracy of that
11 particular Vertilog tool at Aliso Canyon --
12 at SoCalGas?

13 A I -- I was -- after seeing what I
14 saw with the Vertilog, I -- basically, I had
15 no confidence in the log, at least on pipe
16 that you couldn't double-check.

17 Q And how often is that possible?

18 A It's not possible in production
19 casings.

20 Q All right. I want to ask you a
21 couple questions that Ms. Bone asked you
22 about SoCalGas' Replace and Inspect program,
23 and she -- I don't even think we need to put
24 this up, but she noted that in Cal PA Exhibit
25 407, in response to question three, SoCalGas
26 wrote "Between 2007 and 2013, SoCalGas ran,
27 on average, 3.57 ultrasonic inspections per
28 year at Aliso Canyon." So I've done that

1 math. Seven years times 3.57 is 26 and
2 change, subject to check, which I -- I see
3 you've learned that term, as have I.

4 So is that your recollection, that
5 between 2007 and 2013, SoCalGas ran roughly
6 26 to 27 inspections as part of its Replace
7 and Inspect program?

8 A Yeah, I -- I'd go with the number
9 to be somewhere in that vicinity, in the 25
10 to -- 24 to 26 range, subject to check.

11 Q All right. And can you remind your
12 Honors the total number of wells at Aliso
13 Canyon during that time period, gas storage
14 wells?

15 A 116.

16 Q Okay. So if I do that math,
17 subject to check, Mr. Neville, I get about --
18 just about 25 percent. Is that consistent
19 with your recollection?

20 A Yes, that would be -- between 20
21 and 25 percent.

22 Q All right. Let's -- let's -- let's
23 continue, sir. I want to make sure that we
24 all are on the same page with definitions
25 here, because there's been a lot of terms
26 being thrown around over the last couple of
27 days, and I want to make sure that at least
28 we understand your definition of those terms.

1 What do you mean by a hard copy
2 well file?

3 A A hard copy well file is -- refers
4 to the -- basically, the filing system that
5 was set up at the very beginning of
6 operations of the field before the computer
7 even came into place, and it -- it refers to
8 the -- the well files in hard copy form, the
9 well files having four components associated
10 with each well file, and each of the cone --
11 components having a certain function or use
12 relative to how well files are used.

13 Q And you lay out a description of
14 that, of those hard copy well files, in your
15 prepared reply testimony, which has been
16 marked as SoCalGas Exhibit 15?

17 A Yes.

18 Q Okay. And I don't want to belabor
19 that point.

20 Would you -- would you tell us
21 where those files are -- are kept, typically?

22 A Typically, they're kept in the same
23 office as the storage field engineer that --
24 that resides at the storage field at Aliso
25 Canyon.

26 Q Okay. And I believe in response to
27 some of Ms. Bone's questions, you explained
28 sort of how they're routinely used, and you

1 indicated that you, in fact, had used them
2 yourself over the course of your years at
3 Aliso -- at SoCalGas in underground storage.
4 Did I hear you correctly?

5 A Yes.

6 Q All right. So tell us, then, about
7 the electronic databases. What are they,
8 and -- and -- and how do they relate, if at
9 all, to the hard copy well files?

10 A The one electronic database was
11 called PI. It was used for the operational
12 data that -- the many op -- operational data
13 coming into the -- the central plant. It
14 included, you know, pressure data from the --
15 from the wells. It included the operational
16 data that the storage field engineer would
17 need to set the withdrawal and injection
18 schedules for operations to use. It served
19 as the database for operations data.

20 Q Okay. And what is Maximo?

21 A Maximo serves as a database for the
22 maintenance data, work scheduling and
23 tracking for the wellhead and surface
24 equipment in the -- in Aliso Canyon.

25 Q And we've talked a bit about
26 WellView, but I would -- if you wouldn't
27 mind, would you briefly summarize what use
28 WellView has in the operations and

1 maintenance at Aliso Canyon?

2 A Well, WellView was a -- or is a
3 computer software database that -- that is
4 designed to collect and maintain the
5 subsurface data of a well. It was ultimately
6 designed to -- to replace the hard copy well
7 files, the -- the hard copy well history
8 file.

9 Q Okay. And have you, during the
10 course of your career at SoCalGas, used the
11 elec- -- these electronic databases in
12 performing your functions?

13 A Yes; not so much Maximo, but
14 definitely PI and WellView.

15 Q Okay. And -- and -- and how are
16 they accessed, via computer?

17 A Yes, at my desk.

18 Q Okay. All right. And there's been
19 a number of questions about the location of
20 various slots in the tubing in SS-25.

21 Where would you look in the SS-25
22 well file to find that data?

23 A I'd go to the last workover, the
24 1979 workover, and look at the tubing detail
25 associated with that workover.

26 Q And have you seen that information
27 in that well file?

28 A Yes.

1 Q All right.

2 Mr. Moshfegh, let's turn to SED
3 Exhibit 298, please.

4 I just want to walk through,
5 Mr. Neville, very quickly, some -- some
6 diagrams that have been questioned you on,
7 and I want to make sure I understand
8 chronologically what's going on here.

9 Let's start with SED-298, and if we
10 would turn to page Bates stamped ending 4226.
11 Mr. Moshfegh, can you enlarge that, perhaps?

12 All right. So there's the Bates
13 number. Do you see the date on that,
14 Mr. Neville?

15 A Yes, 4-26, 1979.

16 Q Yeah.

17 And then, Mr. Moshfegh, if you
18 would just back out a minute so Mr. Neville
19 could look at the document in its totality.

20 And I'm sorry. I should have a
21 hard copy in front of you, sir. But, so,
22 there have been a number of questions asked
23 about this document. I just want to make
24 sure everyone understands what it is.

25 Is this a depiction -- well, let me
26 ask you this: What is this document?

27 A This is what we call a wellbore
28 schematic.

1 Q Where would you find this document?

2 A It would be in the well file.

3 Q Okay. Under which --

4 A In the --

5 Q Under which of your sub files?

6 A The well history file.

7 Q Okay. And is the date, 4-26,
8 1979 -- does that tell you something about
9 this particular schematic?

10 A Yes, it -- it's a date that follows
11 the workover done in -- in February 1979. So
12 it would be -- in my opinion, it would be the
13 schematic that -- the most updated schematic
14 for this well.

15 Q Okay. And let's --

16 A And let me clarify that. I mean it
17 would be the schematic that was built based
18 on the workover at the time.

19 Q Okay. Thank you for that
20 clarification.

21 Mr. Moshfegh, let's -- let's bring
22 up SED-279, please.

23 All right. Mr. Neville, you've
24 also been asked about this document. And for
25 information purposes, we're turning to
26 page 2, with the Bates stamp numbers ending
27 0067.

28 Do you see the date on the bottom

1 of that document?

2 A Yes.

3 MR. LOTTERMAN: Okay. And let's --
4 let's zoom out a little bit so Mr. Neville
5 can see the entire document.

6 Q Is this also a schematic from the
7 SS-25 hard copy well file?

8 A Yes.

9 Q Okay. And do you know why a new
10 schematic was created what looks like seven
11 years after the workover in 1979?

12 A Yes. There's a -- a note on this
13 schematic that wasn't there on the schematic
14 drawn in 1979, and that note reads: "Unable
15 to use lower nipple, used M-lock for
16 subsurface safety valve nipple, see wire-line
17 tickets."

18 Q Okay. And to be clear, would you
19 expect and do you believe that both of these
20 schematics that I've shown you, SED-298 and
21 SED-279, are in the SS-25 hard copy well
22 file?

23 A Yes.

24 Q All right.

25 Let's go, Mr. Moshfegh, to SED-274,
26 please.

27 Now, at the risk of -- of talking
28 this one to death, I want to go through it

1 very quickly, so we're all on the same page.

2 I believe you testified earlier
3 both to questions by Mr. Gruen and Ms. Bone
4 that although you recognize the underlying
5 document, which apparently is -- looks to be
6 the same as SED Exhibit 279, you do not
7 recognize the handwriting. Correct?

8 A Correct.

9 Q Okay. And can you tell the judges
10 what was going on as of November 10, 2015?

11 A It's a -- after the incident of
12 October 23rd. The well was being killed, in
13 the process of being killed.

14 Q Right. So as of November 10, 2015
15 that leak was still uncontrolled. Is that
16 right?

17 A Yes.

18 Q All right. I'd like to show you
19 a -- a document that we were able to pull out
20 of a database; in fact, I believe it was
21 produced pursuant to a data response. This
22 one has been marked as SoCalGas-167.

23 Mr. Moshfegh, if you would --
24 actually, let me give the Bates numbers for
25 the record. It's SoCalGas-167.0001 through
26 0003. And if you would go to the -- let's
27 work backward on this one. Thank you. So --

28 MR. GRUEN: Your Honor, if I may, may I

1 insert an objection and be heard on that?

2 ALJ POIRIER: Go ahead.

3 MR. GRUEN: Your Honor, it is our
4 understanding this appears to be a redirect
5 exhibit, and it was our understanding during
6 the redirect of Ms. Felts that redirect
7 exhibits were not going to be allowed. So we
8 would assert an objection to SoCalGas using a
9 redirect exhibit at this time.

10 ALJ POIRIER: Mr. Lotterman?

11 MR. LOTTERMAN: Your Honor, I believe
12 this should be the exception to that rule,
13 and I'll tell you why, is -- because I think
14 I will establish in a minute. This is
15 actually a full version of what Mr. Gruen and
16 Ms. Bone were using as SED-274. So I don't
17 view it as a new exhibit. I view it as a
18 complete exhibit.

19 ALJ POIRIER: Okay. We're going to
20 allow this to move forward.

21 Mr. Gruen, you can raise an
22 objection when the exhibit's moved at that
23 point.

24 MR. LOTTERMAN: And -- and -- and to be
25 clear, your Honor, I do not plan to move this
26 exhibit into evidence. I just want to make
27 sure that Mr. Neville understands the
28 circumstances surrounding this -- this

1 schematic.

2 ALJ POIRIER: Okay.

3 MR. LOTTERMAN: Mr. Moshfegh, if you
4 look --

5 ALJ POIRIER: It looks like it's the
6 same document, so let's -- let's go ahead and
7 move forward.

8 MR. LOTTERMAN: Thank you.

9 Q So -- so getting back to this
10 document, Mr. Neville --

11 MR. GRUEN: Your Honor, may -- may I
12 just be clear, just for the record, I believe
13 the second page of the document is -- is the
14 same. The first one is the addition, if --
15 just to be clear, for the record.

16 ALJ POIRIER: Okay. It sounds like the
17 earlier exhibit was an excerpt of this. So I
18 think that's the -- so let's go ahead and
19 continue.

20 MR. LOTTERMAN: All right. So --
21 and -- and I'll try to be as clear as
22 possible, Mr. Gruen. I appreciate that.

23 Q Mr. Neville, turning to the third
24 page of SEG (sic) 167, do you see the
25 schematic with the same handwriting that we
26 looked at earlier on Exhibit 274?

27 A Yes.

28 Q All right. And if you work

1 backward from that, I see very little of --
2 information on page 0002 besides sort of a
3 footer.

4 So let's go to page 0001, and
5 Mr. Moshfegh, if you would just go up to the
6 message to, from, et cetera, and get that as
7 large as you can.

8 Can you read that, Mr. Neville?

9 A Yes.

10 Q So I have a -- it's a very simple
11 question, but I need to -- I need to lay a
12 little predicate here.

13 This appears to be an email from
14 Todd Van De Putte to Bret Lane sent on
15 November 10, 2015, and you see the subject
16 date. And do you see the attachment
17 description?

18 A Yes.

19 Q Okay. Do you recognize this
20 document?

21 A No.

22 Q Okay. So -- so although you
23 recognize the -- the schematic attached, you
24 don't recognize the handwriting, and you
25 cannot identify the -- the email that
26 attached the schematic and handwriting. Is
27 that correct?

28 A Yes. I -- no, I cannot -- I cannot

1 recognize that.

2 Q All right. So here's my question
3 for you: Is it possible, in your experience,
4 for a SoCalGas employee to a copy -- to copy
5 a schematic from the well file, make
6 notations on it, and then send it as an
7 attachment to another SoCalGas employee?

8 A Yes.

9 Q Okay. Would you consider that
10 attachment part of the well record?

11 A No.

12 Q Was it SoCalGas' practice,
13 Mr. Neville, to, from time to time, combine
14 all the sub files in its hard copy well file,
15 and put them in chronological order?

16 A No.

17 Q Why not?

18 A It would defeat the efficiency and
19 the effectiveness, I think, for using the --
20 the well files. They're --

21 Q Are -- excuse me. I'm sorry.

22 A -- organized the way they are for a
23 certain reason, and I think it would make
24 them a lot more unusable.

25 Q So, as far as your understanding
26 goes, and -- and your experience, does
27 SoCalGas have any well files, hard copy well
28 files, that are put completely in

1 chronological order, notwithstanding the type
2 of document involved?

3 A No.

4 MR. LOTTERMAN: All right. Let's turn
5 to Exhibit 275, Mr. Moshfegh, SED-275.

6 Q And Mr. Neville, just to orientate
7 you on this one, I believe Mr. Gruen asked
8 you a series of questions about this. Do you
9 remember that?

10 A Yes.

11 Q So do you have any personal
12 knowledge as to why this particular document
13 was generated in February of 2016?

14 A No.

15 Q Okay. Does it appear to be signed?

16 A No.

17 Q But, if I understood your earlier
18 testimony, do you recognize the format of the
19 document?

20 A Yes.

21 Q How is this format used by
22 SoCalGas?

23 A It's -- it's used to -- to -- to
24 capture the -- the -- the daily work history
25 associated with workovers that are -- that
26 are required by DOGGR, and it's also used to
27 capture daily activities that are not
28 required by DOGGR.

1 Q So let's -- let's take the first
2 example. Explain what -- what sort of
3 information would be on a document that
4 would, in fact, be submitted to DOGGR using
5 this format.

6 A So workovers that are done pursuant
7 to a permit would be -- the form would be
8 used to that, and then basically that
9 involves work that is done to the well
10 that -- that makes a modification of the
11 casing.

12 Q And if information is gathered that
13 does not entail a modification -- when you
14 say, "casing," you're talking about the
15 production casing?

16 A Yes, the production casing.

17 Q Okay. All right. So if
18 information is gathered that does not involve
19 a modification to the production casing, is
20 that information that DOGGR requires to be
21 submitted to it?

22 A No.

23 Q And is this the -- is this the type
24 of format that SoCalGas uses internally to
25 generate and circulate and socialize
26 information?

27 A Yes.

28 Q And is it your understanding -- is

1 it possible to generate in February of 2016
2 activities that occurred in, say, 2007?

3 A Yes.

4 Q Have you done that yourself?

5 A Yes.

6 Q All right. There was a -- there
7 was some -- let's move on to a different
8 topic.

9 There was a discussion earlier
10 about well kills, and -- and you used the
11 phrase, routine well kill.

12 Would you explain what a routine
13 well kill is, and when it's needed?

14 A By routine well kill, we -- we
15 refer to the well kills that are done prior
16 to moving in a workover rig so that the well
17 can be put into a safe condition to work on.

18 Q And what type of information do you
19 need in order to conduct that safe operation?

20 A Information in the well file, which
21 would include such items as the wellbore
22 schematic, tubing detail, workover histories,
23 items that are in -- in the well file or in
24 WellView.

25 Q And why is that type of information
26 important for a workover?

27 A Well, it -- it really sets the
28 program. One needs to know the depths of

1 the -- the packer, how much tubing to pull
2 out of the well, what to expect to receive
3 when pulling the tubing out of the well,
4 and -- and it -- and at the same time, it
5 need -- one needs to decide what's going to
6 go back in and replace it.]

7 Q And when you reviewed the SS-25
8 hardcopy well file in preparation of your
9 testimony in this proceeding, did you see
10 that information in that file?

11 A Yes.

12 Q Okay. Now, do you need to review
13 that type of information if you are
14 conducting a tempered noise log on a well?

15 A No.

16 Q Why not?

17 A I'll say not necessarily. It's --
18 one does need to have a wellbore schematic to
19 give to the operator which will let the
20 operator of the wireline unit that's running
21 the temperature survey know such things as,
22 you know, where the bottom of the tubing is
23 and how deep the well is, and things like
24 that. So wellbore schematic is important
25 there to.

26 Q Back in your drilling and workover
27 days, did you conduct routine well kills?

28 A I did. We're talking early 1990s.

1 Q Okay. And as part of that effort,
2 would you go into a well file and pull the
3 necessary data?

4 A Yes.

5 Q All right. I'd like to talk a
6 little bit about jarring because I'm not
7 quite sure I understand what it is. So I'd
8 like to just have a couple of questions to
9 flesh that out a little bit. You said that
10 it was common to run jars when working on a
11 well. What did you mean by that?

12 A Well, in a wireline operation,
13 you're running a wireline tool down 8000 feet
14 of tubing, and you're running a tool and many
15 times that's just slightly undersized with
16 regard to the tubing. There's not much
17 clearance. So it's not unusual to have the
18 tool get hung up on something in the pipe,
19 but peat, you know, bridget (phonetic) sand
20 or piece of scale or something. So in
21 wireline operations, it's common practice to
22 include a set of jars on the wireline tool
23 just in case that happens.

24 Q And are there other ways to address
25 instances where the tool can't get down the
26 pipe besides running the jar?

27 A Yeah. If the jar -- typically, if
28 you can't jar it through and run it cleanly

1 through, you'd come back out of the well with
2 the wireline tool, and you would then try to
3 run something like scratchers or brushes or
4 something across that section to clean it up.
5 It might even involve putting some --
6 spotting some solvent or (inaudible) or
7 something to try to clean up anything that
8 might be hanging up that -- the wireline
9 tool. So, yes, there's different practices
10 that are done, and eventually the hope is
11 that you'll get the obstruction cleared and
12 you'll be able to run the wireline tool
13 free -- freely.

14 Q And were those practices that
15 SoCalGas performed, whether jarring or
16 otherwise, were those, in your experience,
17 common practices in the petroleum engineering
18 world?

19 A Yes.

20 Q All right. There was a discussion
21 with Mr. Gruen earlier about a particular
22 kill system, and I believe you talked about
23 it being at the surface of the well and not
24 downhole. Do you remember that line of
25 questions?

26 A Yes.

27 Q Okay. And I just want a quick
28 explanation. Would you explain how that kill

1 system is different from, say, a deep-set
2 subsurface safety valve like some of the
3 housings that we saw in SS-25?

4 A Let's see. Are you talking about
5 maybe the surface safety system?

6 Q Yes.

7 A Instead of the kill system?

8 Q Yes. I'm sorry.

9 A Yeah. So that -- yeah. The
10 surface safety system is really designed to
11 protect -- to shut the well off at the
12 surface in the event something happens in the
13 piping downstream of the well. It's an -- it
14 won't shut off the casing. It only shuts off
15 flow to the surface, the horizontal piping at
16 the surface.

17 Q And how does that differ from a
18 deep-set subsurface safety valve in the
19 bottom of a wellbore?

20 A A deep-set subsurface safety valve
21 that -- would be set at the top or close to
22 the top of a storage zone. That -- the
23 concept there would be that it would shut off
24 flow into the well itself, the tubing and the
25 casing, and shut the well off at a closer
26 point to the reservoir -- in fact, right
27 above the reservoir.

28 Q And how do those two safety systems

1 differ from a shallow set subsurface safety
2 valve as you talked about with Mr. Gruen
3 yesterday vis-à-vis landslide hazards?

4 A So a shallow set safety valve is --
5 goes a little further than a surface safety
6 valve in that it will shut off flow in case
7 the wellhead were completely damaged. It
8 protects any issue or leak at the wellhead
9 itself. And these things are typically set
10 between 100 and 500 feet deep.

11 MR. LOTTERMAN: Your Honors, I have one
12 more line of questions, but it's going to
13 take more than 15 minutes. Would it be
14 prudent perhaps to stop here, and then I can
15 gather my notes and we can -- I know Mr.
16 Neville is not going to want to hear this --
17 but to start with him for just, you know, 15,
18 20, 30 minutes in the morning and then we can
19 move on to the MHA witnesses, Mr. Hower and
20 Mr. Stinson?

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

23 (Off the record.)

24 ALJ POIRIER: So back on the record.

25 We're going to pause for the day.
26 When we reconvene tomorrow, there will be
27 some additional redirect and then some
28 additional re-cross from SED and Cal

1 Advocates. I've asked the parties to
2 organize their exhibits and try to smooth
3 that process so we can save some time. After
4 that, we will move to Mr. Hower and Stinson
5 and what we can get there.

6 And I think that's all for
7 housekeeping and -- matters. So we'll
8 reconvene tomorrow at 10:00 a.m.

9 And we will be off the record.

10 (Whereupon, at the hour of 3:31
11 p.m., this matter having been continued
12 to 10:00 a.m., May 7, 2021, the
Commission then adjourned.)

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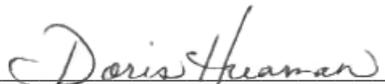
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