

Docket:	<u>I.19-06-016</u>
Exhibit Number	<u>SED-202</u>
Commissioner	<u>Rechtschaffen</u>
Admin. Law Judges	<u>Poirier/Hecht</u>
SED Project Mgr.	M. Felts
SED Witness	March 12, 2021
Date served	



SAFETY AND ENFORCEMENT DIVISION
California Public Utilities Commission

Safety and Enforcement Division
Opening Testimony of Margaret Felts
Attachment Index

San Francisco, California
November 22, 2019

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Footnote Numbers in Testimony	Section	Document	Bates-stamp Number
6, 8	II.A.	Southern California Gas Company Standard Services Agreement (Agreement 5660044243), Project Standard Senson (Sic) 25, October 30, 2015. (SoCalGas and Boots and Coots Well Kill Agreement).	SED 00001-00029
83	II.B	Tr. Mansdorfer, September 13, 2018 at pp. 9:7 - 10:11.	SED 00038-00040
84	II.B	Tr. Mansdorfer, September 13, 2018 at pp. 124:28 - 125:14.	SED 00153-00154
85	II.B	Tr. Mansdorfer, September 13, 2018 at p. 125:19-23.	SED 00154
86	II.B	Tr. Mansdorfer, September 13, 2018 at p. 125:24-26.	SED 00154
87	II.B	Tr. Mansdorfer, September 13, 2018 at p. 125:27-28.	SED 00154
88	II.B	Tr. Mansdorfer, September 13, 2018 at p. 126:25 – 127:23.	SED 00155-00156
102	II.B	Thursday, April 23, 2009 2:12 PM, Mansdorfer to Weibel email; I1906016_SCG_CALADVOCATES_0017314.	SED 00184-00185
103	II.B	Tr. Mansdorfer, September 13, 2018 at pp. 143:21 – 144:9.	SED 00172-00173
104	II.B	Thursday, April 23, 2009 2:12 PM, Mansdorfer to Weibel email; ref-VI.B-003. 2009.0423. Aliso Testimony. JMansdorfer at p. 1.	SED 00184-00185
174	II.B	Email from Brett Lane to Jimmie Cho et al., entitled “Randy Request” AC_CPUC_SED_DR_16_0043578. “Jimmie: Tried to make this easy for you. Attached is the latest draft of the intercept/kill procedure for relief well 1 to SS-25 and the dynamic kill analysis. I have also included the last 5 ranging run reports. We do not have a dynamic kill program developed yet for Relief well 2. We do not have kill programs for SS25A or 25B.”	SED 00186
187	II.B	Tr. Mansdorfer, September 13, 2018 at pp. 81:20 – 83:9.	SED 00110-00112
319, 325, 347	II.B	Blade Report at p. 218; Southern California Gas Company, "Candidate Wells for Casing Inspection, Aliso Canyon Field, Interoffice Correspondence, August 30, 1988 AC_CPUC_0000064-AC_CPUC_0000066 (SS-25 Well Documentation (from SoCalGas)_N.pdf at pp. 42-44)," 1988.	SED 00188-00190, SED 01951-01955
382	II.C	Letter from Mr. Angelo J. Bellomo, MS, REHS, QEP, Deputy Director for Health Protection of Los Angeles County Department of Public Health to Mr. Brett Lane, Chief Executive Officer, Southern California Gas Company, entitled, “ALISO CANYON NATURAL GAS DISASTER FOLLOW-UP REQUEST FOR CRITICAL DATA ELEMENTS”, March 11, 2019. Currently available at: https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/News_Updates/2019/Aliso%20Canyon%20Facility.pdf .	SED 00195-00196

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383, 384	II.C	<i>Available at :</i> https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/News_Updates/2019/Letter-to-Angelo-J-Bellomo-2019-03-21-1.pdf .	SED 00197-00200
385	II.C	Letter from Mr. Angelo J. Bellomo, MS, REHS, QEP, Deputy Director for Health Protection of Los Angeles County Department of Public Health to Mr. Brett Lane, Chief Executive Officer, Southern California Gas Company, entitled, “ALISO CANYON NATURAL GAS DISASTER FOLLOW-UP REQUEST FOR CRITICAL DATA ELEMENTS”, March 11, 2019, p. 2. Currently available at: https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/News_Updates/2019/Aliso%20Canyon%20Facility.pdf .	SED 00195-00196
389	II.C	Letter from Ms. Alice Stebbins, California Public Utilities Commission’s Executive Director, to Mr. Bret Lane, SoCalGas Chief Executive Officer, entitled, “Failure of Southern California Gas Company (SoCalGas) to Timely Provide Data to Blade Energy Partners and Request to Modify the Existing Injection and Withdrawal Protocols at Aliso”, March 19, 2019.	SED 00201-00204
390, 391, 392	II.C	Letter from Ms. Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC, to Mr. Bret Lane, President and Chief Operating Officers, Southern California Gas Company, dated July 11, 2018.	SED 00205-00585
393, 394	II.C	These documents are subpoenas for the appearance of Danny Clayton, Mike Bagget, Danny Walzel, and James Kopecky, respectively. The date of service is shown on the proof of service in each subpoena.	SED 00586-00606
395	II.C	Declaration in Support of the Subpoena, point 5.	SED 00588 (Clayton); SED 00593 (Bagget); SED 00598 (Walzel); SED 00603 (Kopecky)
397	II.C	Letter from SoCalGas Assistant General Counsel, Sabina Clorfeine, to SED counsels, Messrs. Nicholas Sher and Darryl Gruen, entitled, “Southern California Gas Company’s Response to California Public Utilities Commission Letter dated July 11, 2018.	SED 00612

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Footnote Numbers in Testimony	Section	Document	Bates-stamp Number
396 398, 409	II.C	SoCalGas footnote 1 of footnote 397 [below] stated, "Other than Halliburton's limited provision of services to SoCalGas as an independent contractor, SoCalGas and Halliburton are currently unaffiliated. SoCalGas does not own and holds no interest in Halliburton or any of its subsidiaries, and vice-versa."; Southern California Gas Company Standard Services Agreement (Agreement 5660044243), Project Standard Senson (Sic) 25, October 30, 2015. (SoCalGas and Boots and Coots Well Kill Agreement).	SED 00607-00611; SED 00612-00634
399	II.C	Examination Under Oath Transcript (Tr.) of Danny Walzel and James Kopecky at pp. 1, 5:10-17.	SED 00635-00639
400	II.C	EUO Tr. Walzel and Kopecky at pp. 26:3 – 29:19.	SED 00660-00663
401	II.C	EUO Tr. Walzel and Kopecky at p. 41:2-4.	SED 00675
402	II.C	EUO Tr. Walzel and Kopecky at p. 119:24-28.	SED 00753
403	II.C	EUO Tr. Walzel and Kopecky at p. 80:10-16.	SED 00714
404	II.C	EUO Tr. Walzel and Kopecky at pp. 134:1-7, 134:13-22.	SED 00768
405	II.C	EUO Tr. Walzel and Clayton at p. 130:8-12.	SED 00764
406	II.C	EUO Tr. Walzel and Kopecky at pp. 80:18, 81:12.	SED 00714-00715
407	II.C	EUO Tr. Walzel and Kopecky at p. 120:20-26.	SED 00754
408	II.C	EUO Tr. Walzel and Kopecky at p. 121:3-15.	SED 00755
410	II.C	SoCalGas' Supplemental Response Dated March 15, 2019 to Multiple SED Data Requests, Including Portions of Data Request 16 at p. 1. SED initially propounded Data Request 16 February 12, 2018.	SED 00787-00791
411	II.C	SoCalGas' Supplemental Response Dated March 15, 2019 to Multiple SED Data Requests, Including Portions of Data Request 16 at p. 2. SED initially propounded Data Request 16 February 12, 2018.	SED 00787-00791
412, 413	II.C	Letter from SoCalGas Assistant General Counsel, Sabina Clorfeine, to SED counsels, Messrs. Nicholas Sher and Darryl Gruen, entitled, "Southern California Gas Company's Response to California Public Utilities Commission Letter dated July 11, 2018 at p. 2.	SED 00793
413	II.C	Letter from SoCalGas Assistant General Counsel, Sabina Clorfeine, to SED counsels, Messrs. Nicholas Sher and Darryl Gruen, entitled, "Southern California Gas Company's Response to California Public Utilities Commission Letter dated July 11, 2018. at p. 2, fn. 3.	SED 00793
414	II.C	SoCalGas Attorney-client privilege-log in response to SED Data Request 16. For example, see entries 3 and 5.	SED 00796-01172

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Footnote Numbers in Testimony	Section	Document	Bates-stamp Number
415	II.C	SoCalGas' Supplemental Response Dated March 15, 2019 to Multiple SED Data Requests, Including Portions of Data Request 16 at p. 2. SED initially propounded Data Request 16 February 12, 2018.	SED 00787-00791
417	II.C	SoCalGas' Supplemental Response Dated March 15, 2019 to Multiple SED Data Requests, Including Portions of Data Request 16 at p. 2. SED initially propounded Data Request 16 February 12, 2018.	SED 00787-00791
418	II.C	SoCalGas' Supplemental Response Dated March 15, 2019 to Multiple SED Data Requests, Including Portions of Data Request 16, page 3. SED initially propounded Data Request 16 February 12, 2018.	SED 00787-00791
419	II.C	SoCalGas' Supplemental Response Dated March 15, 2019 to Multiple SED Data Requests, Including Portions of Data Request 16 at p. 3, showing Bates Number ranges. SED initially propounded Data Request 16 February 12, 2018.	SED 00787-00791
420	II.C	"Request for Factual Data Verification Discussion December 19th, 2018-Boots and Coots".	SED 01173-01174
421	II.C	"Email thread from SoCalGas outside counsel, James Dragna, to Halliburton's counsel, Michael Helsely, January 7-8, 2019. See also Attachment Q, "Email Correspondence Between James Dragna (SoCalGas counsel) and Michael Helsley.	SED 01175-01177
422	II.C	"Email thread between SoCalGas outside counsel, James Dragna, Halliburton's counsels, Timothy Jones and Michael Helsley, January 25, 2019, and February 22, 2019.	SED 01178-01179
423	II.C	Letter from Boots and Coots Counsel, Timothy Jones, to SoCalGas Outside Counsel, James Dragna, dated January 24, 2019.	SED 01180-01181
424	II.C	Letter from SED Director Elizaveta Malashenko to SoCalGas Chief Executive Officer, Brett Lane, entitled, "Second Memorialization of Southern California Gas Company's (SoCalGas) Failure to Cooperate with Safety and Enforcement Division's (SED) Preliminary Investigation, February 21, 2019.	SED 01185-01186
425	II.C	SoCalGas Response to SED Data Request 23, Dated August 14, 2018.	SED 011827-01189
426	II.C	SoCalGas Response to SED Data Request 23, Dated August 14, 2018, p 2.	SED 01187-01189
427	II.C	Examination Under Oath of Bret Lane at p. 10:27 – 11:3.	SED 01199-01200
429	II.C	Tr. Statement of Non-Appearance, November 1, 2019 at p. 3:5-28.	SED 01354
430	II.C	Email correspondence between SED Staff Counsel, Mr. Darryl Gruen, and SoCalGas Senior Counsel, Ms. Avisha Patel, dated October 30 and October 31, 2019. (SoCalGas Intent to Note Appear for Deposition Email.)	SED-01352-01353

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Footnote Numbers in Testimony	Section	Document	Bates-stamp Number
431	II.C	SoCalGas Intent to Not Appear for Deposition Email.	SED 01352-01353
432	II.C	SoCalGas Intent to Not Appear for Deposition Email.	SED 01352-01353
433	II.C	Email from SED Counsel Nicholas Sher to SoCalGas Counsel Sabina Clorfeine providing service of subpoena, and attached subpoena.	SED 01360-01364
434	II.C	Email Communication Between SED Counsel Nicholas Sher and SoCalGas Outside Counsel, Pejman Moshfegh, dates October 28, 2019 to October 29, 2019.	SED 01365-01367
437	II.C	Aliso Canyon OII/OSC SED Opening Testimony Supporting Attachments, Bates SED 01363, 2017_GasStorageRegulatoryConsiderations-reduce.pdf, p.24, 49-52, 76-77, 101-102. NOTE: While this document was published in 2017, it draws on industry standards to identify records that are typically retained for the life of the facility.	SED 01368-01497
438	II.C	SS-25 Well File, "Supporting Attachments" SED 01499.	SED 01499
439	II.C	SS- 25Well File, Supporting Attachments SED 01499; note: documents in Well File are chronological.	SED 01499
440	II.C	SS-25 Well File, Supporting Attachments SED 01519, 01523-01524, 1529-1541.	SED 01519, 015123-01524, 1529-1541
441	II.C	SS-25 Well File, Supporting Attachments SED 01542, 1552, 1569-1573.	SED 01542, 1552, 1569-1573.
442	II.C	SS-25A & SS-25B Well Files, Supporting Attachments SED 01768 and SED 01879.	SED 01768 and SED 01879