

SED-306

SoCalGas Response to SED Data Request 65, Question 1

I.19-06-016

ALJs: Hecht/Poirier

Date Served: May 6, 2021

**ORDER INSTITUTING INVESTIGATION ON THE COMMISSION'S OWN MOTION INTO THE 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 UNCONTROLLED RELEASE OF NATURAL GAS FROM ITS ALISO CANYON STORAGE FACILITY  
(I.19-06-016)**

**SOUTHERN CALIFORNIA GAS COMPANY**

**(DATA REQUEST CPUC-SED-65 DATED APRIL 6, 2020)**

**SOCALGAS RESPONSE DATED APRIL 16, 2020**

SoCalGas provides the following Responses to the Safety & Enforcement Division (SED) data request dated April 6, 2020 in I.19-06-016. The Responses are based upon the best available, nonprivileged information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request, and within SoCalGas' possession, custody, or control. SoCalGas reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

SoCalGas objects to the instructions submitted by SED and to the continuing and indefinite nature of this request on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature and continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(d) and 030.060(g), respectively. SoCalGas will provide responsive documents in existence at the time of its response. Should SED seek to update its request, SoCalGas will respond to such a request as a new data request in the future.

SoCalGas submits these Responses, while generally objecting to any Request that fails to provide a defined time period to which SoCalGas may tailor its Response, and to the extent that any Request is overly broad, vague, ambiguous, unduly burdensome, assumes facts, or otherwise fails to describe with reasonable particularity the information sought. SoCalGas further submits these Responses without conceding the relevance of the subject matter of any Request or Response. SoCalGas reserves the right to object to use of these Responses, or information contained therein, in any dispute, matter or legal proceeding. Finally, at the time of this Response, there are no pending oral data requests from SED to SoCalGas.

**QUESTION 1:**

1. Page 11 states, "Where circumstances warranted, SoCalGas performed more extensive investigations. Examples of this work done to address leaks at wells FF-34A and Frew 3, where SoCalGas observed migration of gas in the subsurface away from the wellbores. SoCalGas' investigations included gas sampling to confirm the source of the leaking gas and analysis of offset wells to determine the extent of gas migration away from the well with the casing leak. . ." The footnote of this passage, footnote 41, references Ex. I-14 (SCG00195774). With this passage on mind, please answer the following.

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- a. Regarding Exhibit I-14, provide evidence that the casing holes identified in the well file at 1000 and 1060 ft in the Frew-3 casing were confirmed and repaired.
- b. In support of the answer to question 1a, please provide copies of the well file pages that show the dates, methods of inspection, and type of repair.

**Response 1:**

a. SoCalGas objects to this request as vague and ambiguous with regards to the phrase "casing holes identified" and the phrase "holes...were confirmed and repaired." SoCalGas further objects to the degree that it assumes facts regarding the existence of holes at 1000 and 1060 feet in well Frew 3. SoCalGas further objects to this request to the extent that this question is premised on a mischaracterization of Exhibit I-14. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. A casing hole was ultimately identified at 3240 feet. The leak at 3240 feet was repaired by squeezing cement and installing an inner string.

b. Please refer to the previously produced document with Bates number AC\_CPUC\_0022894.