

SED-312

SoCalGas Response to SED Data Request 16

I.19-06-016

ALJs: Hecht/Poirier

Date Served: May 17, 2021

**SOUTHERN CALIFORNIA GAS COMPANY
CPUC-SAFETY AND ENFORCEMENT DIVISION
DATA REQUEST DATED MARCH 30, 2018**

SOCALGAS RESPONSE DATED MAY 23, 2018

Preliminary Statement

SoCalGas provided responses to the CPUC-Safety and Enforcement Division's (CPUC-SED) data request dated February 12, 2018 related to the preliminary investigation regarding the Aliso Canyon Well Leak (SED 16), on March 1, 2, and 5, 2018. On March 30, 2018, SED provided new instructions to be followed when providing a data response, and requested that SoCalGas re-produce the responses to this request. SoCalGas hereby re-produces the responses to SED 16. In addition, SoCalGas has added a document that was inadvertently omitted from the prior production (see Bates Range AC_CPUC_SED_DR_16_0000107).

The Responses are based upon the best available, non-privileged 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 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 objects to CPUC-SED's instruction that SoCalGas' Responses be "verified" as that term is used in the instructions to SED's Request and verification is not required under the cited authority. SED has not defined this term within its request. 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 before any court, tribunal, agency or governmental action. Finally, at the time of this Response, there are no pending oral data requests from the CPUC-SED to SoCalGas.

Question 1:

Please provide resumes/c.v. for the following individuals:

- a. Bret Lane
- b. Todd Van De Putte
- c. Tom Egbert
- d. Rodger Schwecke
- e. Jimmie Cho

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Response 1:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas does not have current resumes/c.v. for the requested individuals. For SoCalGas employee history and educational background for these individuals, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000001.

Question 2:

Of those individuals identified in response to question 1, please explain their roles related to the SS25 well leak on October 23rd, 2015.

Response 2:

SoCalGas understands this question to be asking for an explanation of the individual's roles following the leak that occurred on October 23, 2015 through completion of the well kill on February 18, 2016.

- a. Bret Lane: Mr. Lane initially supported the incident response in his role as SoCalGas' Chief Operating Officer. On or around October 26, 2015, Mr. Lane arrived onsite at Aliso Canyon, and was initially responsible for operational elements and logistics. On or around October 31, 2015, Mr. Cho formed the SoCalGas Aliso Canyon Incident Command structure and designated Mr. Lane as Operations Section Chief. As Operations Section Chief, Mr. Lane reported to Jimmie Cho and was focused on well kill operations and the subsequent relief well efforts.
- b. Todd van de Putte: Mr. van de Putte was involved in the initial response efforts and initial well kill operations. Mr. van de Putte also supported the relief well operations.
- c. Thomas Egbert: Mr. Egbert was involved in the initial response and initial SoCalGas well kill operations. In addition, Mr. Egbert initially acted as a liaison between SoCalGas and various agencies and emergency responders. When the SoCalGas Aliso Canyon Incident Command structure was assembled on or around October 31, 2015, Mr. Egbert returned to his regular job duties as Underground Gas Storage Engineer, which includes managing the wells and deliverability at Aliso Canyon.
- d. Rodger Schwecke: Mr. Schwecke was not initially involved in the incident response efforts, and did not engage in the incident response until November 11, 2015, at which point Mr. Schwecke's role was in communications. In this role, Mr. Schwecke dealt with

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media and public communications, and was not involved in the initial decisions or well kill attempts. On or around November 15, 2015 and after the initial Boots & Coots well kill attempt, Mr. Schwecke began supporting Mr. Lane as Deputy Operations Chief of the SoCalGas Aliso Canyon Incident Command.

- e. Jimmie Cho: Mr. Cho initially supported the incident response in his role as Senior Vice President of System Operations and Integrity and formed the SoCalGas Aliso Canyon Incident Command structure. Mr. Cho served as Incident Commander of the SoCalGas Aliso Canyon Incident Command from approximately October 31, 2015 through February 19, 2016, and served as one of the Incident Commanders of the Unified Aliso Canyon Incident Command which included LA County Fire and LA County Department of Public Health, from approximately January 22, 2016 through February 19, 2016. In his role as Incident Commander, Mr. Cho was responsible for the overall incident, operations, planning, and agency and government interactions and communications.

Question 3:

Please provide any and all contracts between Southern California Gas Company (“SoCalGas”) and Boots and Coots for the years 2010-2018.

Response 3:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Boots & Coots operates as a subsidiary of Halliburton Energy Services, Inc. (“Halliburton”), and SoCalGas contracts with Halliburton for Boots & Coots services. For contracts between SoCalGas and Halliburton, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000002 - AC_CPUC_SED_DR_16_0000342.

Question 4:

Of those contracts between SoCalGas and Boots and Coots provided in response to question 2, please specify which contracts with Boots and Coots were related to the leak on Aliso Canyon well SS 25.

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Response 4:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas understands this question to be requesting information related to those contracts in Question 3.

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Boots & Coots operates as a subsidiary of Halliburton, and SoCalGas contracts with Halliburton for Boots & Coots services. For contracts between SoCalGas and Halliburton for Boots & Coots services related to the SS-25 Incident, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000104 - AC_CPUC_SED_DR_16_0000133.

Question 5:

Of those contracts between SoCalGas and Boots and Coots provided in response to question 2, please specify which contracts are related to:

- a. The first well kill attempt of Aliso well SS25 with Boots and Coots;
- b. The second well kill attempt of Aliso well SS25 with Boots and Coots;
- c. The third well kill attempt of Aliso well SS25 with Boots and Coots;
- d. The fourth well kill attempt of Aliso well SS25 with Boots and Coots;
- e. The fifth well kill attempt of Aliso well SS25 with Boots and Coots;
- f. The sixth well kill attempt of Aliso well SS25 with Boots and Coots;

Response 5:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas understands this question to be requesting information related those contracts in Question 3.

SoCalGas understands that Boots & Coots operates as a subsidiary of Halliburton, and SoCalGas contracts with Halliburton for Boots & Coots services. For contracts between SoCalGas and Halliburton for the Boots & Coots SS-25 well kill attempts 1-6, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000104 - AC_CPUC_SED_DR_16_0000133.

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Question 6:

Please provide any employees that were involved from Boots and Coots in the following:

- a. First well kill attempt;
- b. Second well kill attempt;
- c. Third well kill attempt;
- d. Fourth well kill attempt;
- e. Fifth well kill attempt;
- f. Sixth well kill attempt.

Response 6:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request for failing to specify the time period for which SED seeks a response. SoCalGas interprets this request to be limited to the names of the Boots & Coots employees that were on site at Aliso Canyon and involved in each of the well kill attempts, as specified (a – f), on the dates specified in the Response. Notwithstanding this objection, SoCalGas responds as follows:

- a. First Boots & Coots well kill attempt (November 13, 2015);

Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000343. The following Boots and Coots employees worked on the SS-25 well control on November 13, 2015, the date of the first Boots and Coots well kill attempt.

- Danny Clayton (Sr. Well Control Specialist)
- James Kopecky (Well Control Specialist)
- Danny Walzel (Sr. Well Control Engineer)
- Mike Baggett (HSE Specialist)

- b. Second Boots & Coots well kill attempt (November 15, 2015);

Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000344. The following Boots and Coots employees worked on the SS-25 well control on November 15, 2015, the date of the second Boots and Coots well kill attempt.

- Danny Clayton (Sr. Well Control Specialist)
- James Kopecky (Well Control Specialist)
- Danny Walzel (Sr. Well Control Engineer)

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- Mike Baggett (HSE Specialist)

c. Third Boots & Coots well kill attempt (November 18, 2015);

Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000345. The following Boots and Coots employees worked on SS-25 on November 18, 2015, the date of the third Boots and Coots well kill attempt.

- Danny Clayton (Sr. Well Control Specialist)
- James Kopecky (Well Control Specialist)
- Danny Walzel (Sr. Well Control Engineer)
- Mike Baggett (HSE Specialist)

d. Fourth Boots & Coots well kill attempt (November 24, 2015);

Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000346. The following Boots and Coots employees worked on SS-25 well control on November 24, 2015, the date of the fourth Boots and Coots well kill attempt.

- Danny Clayton (Sr. Well Control Specialist)
- James Kopecky (Well Control Specialist)
- Danny Walzel (Sr. Well Control Engineer)
- Mike Baggett (HSE Specialist)
- John Hatteberg (Well Control Engineer)

e. Fifth Boots & Coots well kill attempt (November 25, 2015);

Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000347. The following Boots and Coots employees worked on SS-25 well control on November 25, 2015, the date of the fifth Boots and Coots well kill attempt.

- Danny Clayton (Sr. Well Control Specialist)
- James Kopecky (Well Control Specialist)
- Danny Walzel (Sr. Well Control Engineer)
- Mike Baggett (HSE Specialist)
- John Hatteberg (Well Control Engineer)

f. Sixth Boots & Coots well kill attempt (December 22, 2015).

Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000348. The following Boots and Coots employees worked on SS-25 well control on December 22, 2015, the date of the sixth Boots and Coots well kill attempt.

- Richard Hatteberg (Sr. Well Control Specialist)
- Travis Martel (Well Control Specialist)

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- Mike Baggett (HSE Specialist)
- Jim LaGrone (Sr. Well Control Engineer)
- Rolly Gomez (Sr. Well Control Engineer)
- Danny Clayton (Sr. Well Control Specialist)
- Bud Curtis (Sr. Well Control Specialist)

Question 7:

Please provide Well kill plans, 1, 2, 3, 4, 5, and 6.

Response 7:

SoCalGas understands this question to be asking for Boots & Coats well kill plans 1-6. Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0000349 - AC_CPUC_SED_DR_16_0000360.

Question 8:

It is SED's understanding that these well kill plans reference in question 7 are also referred to as "sheets". Please confirm SED's understanding is accurate.

Response 8:

Yes.

Question 9:

Please provide any deviations that occurred from the well kill plans provided in response to Question 7.

Response 9:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as vague and ambiguous. Notwithstanding this objection, SoCalGas responds as follows: For actual work conducted at the SS-25 site on the dates of each Boots & Coats well kill, please see electronic documents with Bates Range:

- AC_CPUC_SED_DR_16_0000700 - AC_CPUC_SED_DR_16_0000702 (11-13-15)
- AC_CPUC_SED_DR_16_0000706 - AC_CPUC_SED_DR_16_0000708 (11-15-15)
- AC_CPUC_SED_DR_16_0000715 - AC_CPUC_SED_DR_16_0000717 (11-18-15)

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- AC_CPUC_SED_DR_16_0000732 - AC_CPUC_SED_DR_16_0000734 (11-24-15)
- AC_CPUC_SED_DR_16_0000735 - AC_CPUC_SED_DR_16_0000737 (11-25-15)
- AC_CPUC_SED_DR_16_0000793 - AC_CPUC_SED_DR_16_0000794 (12-22-15)

Question 10:

Please provide any and all communications relating to Aliso Canyon between SoCalGas and Boots and Coots for the time period October 1, 2015 – January 31, 2018.

Response 10:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0001027 - AC_CPUC_SED_DR_16_0019407. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Question 11:

Please provide any and all contracts between SoCalGas and Don Shackelford for the years 2010-2018.

- a. Of those contracts between SoCalGas and Don Shackelford provided in response, were any of those related to, or used for Mr. Shackelford's services on the leak on Aliso Canyon well SS 25. If so, please specify which ones.

Response 11:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas contracted with Sierra Hamilton, LLC for Don Shackelford's consulting services for the well leak at SS-25. See electronic documents with Bates Range AC_CPUC_SED_DR_16_0024118 - AC_CPUC_SED_DR_16_0024131.

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Question 12:

Please provide any and all communications relating to Aliso Canyon between SoCalGas and Don Shackleford for the time period October 1, 2015 – January 31, 2018.

Response 12:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0019408 - AC_CPUC_SED_DR_16_0024117 and AC_CPUC_SED_DR_16_0024132 - AC_CPUC_SED_DR_16_0025021. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Question 13:

When did SCG implement SIMP?

Response 13:

The Commission approved SoCalGas' SIMP proposal in Decision (D.)16-06-054, however, SoCalGas commenced well integrity and management work related to the SIMP prior to the CPUC decision with a pilot program in 2014.

Question 14:

Why did SCG implement SIMP?

Response 14:

SIMP is a proactive plan to assess and enhance the safety and integrity of our underground storage system by conducting more detailed assessments of our storage wells and related infrastructure to identify and mitigate conditions that may otherwise remain undetected. Specifically, SIMP is intended to:

- Identify threats and perform risk assessment for all wells
- Develop an assessment plan for all wells

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- Remediate conditions
- Develop preventive and mitigation measures
- Maintain associated records

Through the implementation of SIMP, better storage system data is being collected, maintained and modeled to identify the top risks throughout Storage. Comprehensive plans to mitigate these risks are being developed and implemented.

SoCalGas' underground storage system become increasingly critical to sustaining system reliability as large-capacity, quick-start electric generators have been added to the SoCalGas territory. These large quick-start generators initiate a very different load pattern on our system, causing sudden and dramatic increases in demand over a very short period of time, and link the reliability of natural gas service and the reliability of the electric grid to a far greater extent than in the past. Additional investments in our underground storage system, through the SIMP program, were made to continue to provide reliable gas service, and potentially, to support the reliability of the electric grid.

In addition, historically, safety and risk considerations for storage wells and their associated valves and piping components have received less regulatory focus and attention, as compared to distribution and transmission facilities, as evidenced by the fact that distribution and transmission facilities are governed by mandatory regulations (DIMP/TIMP). SIMP was designed so that our storage well assets would be managed and approached in a manner consistent with the approach adopted for the distribution and transmission systems, whether or not regulations are in place to mandate such a program.

Question 15:

Who was the driver of SIMP (SME and responsible manager in charge)

Response 15:

SoCalGas objects to this Request to the extent that it is vague and ambiguous and to the extent that it assumes the involvement of only one person rather than multiple persons.

Notwithstanding this objection, SoCalGas responds as follows:

SoCalGas began work on a well assessment program around 2012, incorporating the latest technology tools and integrity verification methods. This work eventually led to the development of the SIMP methodology, which formulated SoCalGas' SIMP Program which was proposed in the 2016 General Rate Case (A.14-11-004) testimony of Phil Baker. The SIMP Program was part of SoCalGas' overall commitment to delivering safe and reliable natural gas service to customers at reasonable rates, through a safety-first culture, as presented in the 2016 General Rate Case testimony of J. Bret Lane.

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Question 16:

With regards to well-kill attempts, what data did SCG (or its agents) provide to the National Labs? Did SCG provide the Labs with any other data relating to the Aliso leak? Was any information received back?

Response 16:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request for failing to specify the time period for which SED seeks a response and to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0025022 - AC_CPUC_SED_DR_16_0025630 and AC_CPUC_SED_DR_16_0041587 - AC_CPUC_SED_DR_16_0041596. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Question 17:

What was Halliburton's role at Aliso Canyon (during the well kill attempts)?

Response 17:

Halliburton Energy Services, Inc., the parent company of Boots & Coots, provided pumping services during well kill attempts.

Question 18:

Provide a list of all Boots and Coots personnel who were present for any amount of time at Aliso between October 2015 and January 2018; please include job descriptions, titles, and the dates when each individual was present.

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Response 18:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as overly broad and unduly burdensome. Notwithstanding this objection, SoCalGas responds as follows: For SS-25 and P39A Boots & Coots Daily Reports, which include a list of Boots & Coots personnel, job titles, and dates the individuals were present, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0025631 - AC_CPUC_SED_DR_16_0025808. For Aliso Canyon Access Passes, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0025809 - AC_CPUC_SED_DR_16_0041586.

Question 19:

Provide any contractors, subcontractors, or other personnel hired by SoCalGas who were involved in the operations of the leak response and subsequent kill operations, and also present at Aliso for the dates mentioned in question 18; please include job descriptions, titles, and the dates when each individual was present.

Response 19:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as overly broad and unduly burdensome. Notwithstanding this objection, SoCalGas responds as follows:

- 1816 Drilling (Pete Slagel)
- Ace Pump
- ACME Truck Line Inc
- Add Energy (Morten Haug Emilsen)
- Advanced Industrial Services
- Andy Gump
- Anterra Energy Services Inc
- Applus RTD
- B&L Casing Services
- B&L Trailer Rentals

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- Baker Hughes
- Bakersfield Pipe & Supply - OCTG
- BCI Construction
- Boots & Coots
- Brandt
- Cameron West Coast
- Capstone Fire Management Inc
- Carbone Wireline
- Steve Cardiff
- Central Coast Piping Products
- Chemical Waste Management Inc
- Clean Harbors Environmental
- Doby Hagar Trucking
- Downhole Stabilization
- Ensign Resources
- Jim Fox
- Geo Drilling Fluids Inc
- G.M. Volkmar
- Halliburton Energy Services
- Hogg Drilling
- Hurst Welding
- Instrument Service Incorporated
- Kennedy Jenks
- Kevin Katolas
- Krummrich Engineering
- K-Vac Environmental Services Inc
- Jim Mansdorfer
- Mission Valley Sanitation Inc
- National Oilwell/Varco
- NOV Tubscope
- NRC Environmental Services
- Oil Field Tubulars
- Onyx Oil Service Inc
- OST Trucks & Cranes
- Pacific Petroleum
- Padilla Electric Builders Inc
- Petroleum Solids Control

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- Petrolog
- Pinkerton Consulting & Investigation
- Quality Ag Inc
- Quality Tubular Services Inc
- San Joaquin Bit Service
- SC Fuels
- Schlumberger Technology Corp
- SDI (Scientific Drilling)
- Sierra Hamilton (Don Shackelford)
- Sperry
- T&T Truck and Crane Service
- Tel Steel
- Thompco
- UCI Construction Inc
- United Rental
- Valley Perforating
- Vector Magnetics
- Veolia ES Technical Solutions Llc
- Versa-Line Services Inc
- Weatherford
- Welaco
- Western Wireline
- Wild Well (John Wright)

For SoCalGas Daily Operations Reports for SS25 and P39A that include vendor names and dates, please see electronic documents with Bates range AC_CPUC_SED_DR_16_0000361 - AC_CPUC_SED_DR_16_0001026. For Aliso Canyon Access Passes, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0025809 - AC_CPUC_SED_DR_16_0041586.

Question 20:

Provide a list of all Haliburton personnel who were present for any amount of time at Aliso between October 2015 and January 2018; please include job descriptions, titles, and the dates when each individual was present.

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Response 20:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as overly broad and unduly burdensome. Notwithstanding this objection, SoCalGas responds as follows: For SoCalGas Daily Operations Reports for SS25 and P39A which include vendor names and dates, including Haliburton Energy Services, Inc., please see electronic documents with Bates range AC_CPUC_SED_DR_16_0000361 - AC_CPUC_SED_DR_16_0001026. For Aliso Canyon Access Passes, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0025809 - AC_CPUC_SED_DR_16_0041586.