

AMENDED

Pursuant to 4/11/2022 ALJ Order

and

AMENDED

Pursuant to 4/18/2022 ALJ Order

EXHIBIT SED 324

**Southern California Gas Company's (SoCalGas) responses to
SED Data Requests 167 and 168**

**Southern California Gas Company
Response to SED Data Request 167**

**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
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SOCALGAS RESPONSE DATED MARCH 8, 2022

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated October 7, 2021 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' responses do not include information collected or modeled by Blade Energy Partners' during its Root Cause Analysis Investigation. 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:

Provide the list of attendees for all daily meetings that Boots & Coots attended from October 23, 2015 through February 27, 2016.

RESPONSE 1:

SoCalGas objects to this request on the ground it is vague and ambiguous, particularly with respect to the phrase "daily meetings." SoCalGas further objects to this request on

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the grounds it is duplicative and seeks information that is already in the possession of SED. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas, Boots & Coots, and other attendees participated in various meetings during the time period identified, including meetings which occurred informally, as needed, multiple times throughout the course of a day. Meeting attendees are identified on documents that have already been produced by SoCalGas to SED. SoCalGas previously produced to SED communications with Boots & Coots for the time period requested, including meeting calendar invites that would identify pre-scheduled meetings and meeting invitees. In addition, the Boots & Coots daily operations reports, which were previously provided as Bates Range AC_CPUC_SED_DR_16_0025631-AC_CPUC_SED_DR_16_0025808, identify the Boots & Coots personnel working on the SS-25 well each day. Redacted versions of the Boots & Coots daily operations reports have also been provided in Exhibit SoCalGas-09 and [Exhibit SED-227](#) in I.19-06-016.

Moreover, meeting minutes for the Division of Oil, Gas, and Geothermal Resources' (DOGGR) daily meetings, which were previously provided in Exhibit II-3 to Exhibit SoCalGas-24, identify attendees for meetings including Boots & Coots personnel where applicable. Daily reports were also issued for the Incident Command Structure that identify SoCalGas, Boots & Coots and other personnel working on the SS-25 incident. See electronic documents with Bates range AC_CPUC_SED_DR_30_0000033 - AC_CPUC_SED_DR_30_0000475.

QUESTION 2:

Provide in groups all notes and minutes prepared by attendees of daily meetings that Boots & Coots attended from October 23, 2015 through February 27, 2016.

- a. Each group of notes should be marked to show which attendee took them.

RESPONSE 2:

SoCalGas objects to this request on the ground it is vague and ambiguous, particularly with respect to the phrases "in groups" and "daily meetings." SoCalGas further objects to this request on the grounds it is overly broad and unduly burdensome, is duplicative, and seeks information that is already within the possession of SED. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please see

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Response 1.

QUESTION 3:

Identify all of the attendees of daily meetings that Boots & Coots attended from October 23, 2015 through February 27, 2016 who took notes during those meetings.

RESPONSE 3:

SoCalGas objects to this request on the ground it is vague and ambiguous, particularly with respect to the phrases “daily meetings” and “who took notes during those meetings.” SoCalGas further objects to this request on the grounds it is overly broad and unduly burdensome, is duplicative, and seeks information that is already within the possession of SED. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 1. Separate from documents already produced, SoCalGas cannot today identify who took notes during meetings.

QUESTION 4:

Provide all handouts provided at daily meetings that Boots & Coots attended from October 23, 2015 through February 27, 2016.

RESPONSE 4:

SoCalGas objects to this request on the ground it is vague and ambiguous, particularly with respect to the phrases “all handouts” and “daily meetings.” SoCalGas further objects to this request on the grounds it is overly broad and unduly burdensome, is duplicative, and seeks information that is already within the possession of SED. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas understands “handouts” to mean documents that were copied or printed in advance of a meeting and distributed to all meeting attendees in the course of the meeting. SoCalGas has not located any documents that it can clearly identify were distributed as handouts provided at daily meetings that Boots & Coots attended. See also Response 1.

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QUESTION 5:

Provide all written communications between SoCalGas personnel, including consultants, and Boots & Coots personnel who were involved in planning, executing and analyzing the results of top kills for SS-25 from October 23, 2015 through January 31, 2016. (Do not include or refer to emails already provided.)

RESPONSE 5:

SoCalGas objects to this request on the grounds it is vague and ambiguous, including with respect to the phrase "SoCalGas personnel, including consultants." SoCalGas additionally objects to this request on the grounds it is overly broad and unduly burdensome, is duplicative and seeks documents that are already in the possession of SED, and seeks documents and information that are not within SoCalGas's possession, custody, or control. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas previously provided non-privileged communications between SoCalGas and Boots and Coots, relating to Aliso Canyon, for the time period October 1, 2015 – January 31, 2018.

QUESTION 6:

Identify all SoCalGas employees and contractors who provided information about the physical condition of well SS-25 to Boots & Coots from October 23, 2015 through February 27, 2016?

RESPONSE 6:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase, "provided information about the physical condition of well SS-25..." SoCalGas additionally objects to this request on the grounds it is overly broad and unduly burdensome, is duplicative and seeks documents that are already in the possession of SED, and seeks documents and information that are not within SoCalGas's possession, custody, or control. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas personnel and contractors working on the SS-25 incident had various informal and formal

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communications with Boots & Coots, who were on site and had access to the well and well records. For written communications between SoCalGas and Boots & Coots, please see Response 5. Contractors involved in the leak response or well kill operations that communicated or may have communicated with Boots & Coots during the well kill operation include:

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

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- 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
- 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

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- Vector Magnetics
- Veolia ES Technical Solutions Llc
- Versa-Line Services Inc
- Weatherford
- Welaco
- Western Wireline
- Wild Well (John Wright)

QUESTION 7:

Provide all of the information about the physical condition of Well SS-25 casing, tubing, safety valves, and any additional equipment in the well tubing or casing known to exist as of October 23, 2015, that was provided to Boots & Coots from October 23, 2015 through February 27, 2016 (excluding data contained in the SS-25 well file and documents already provided to SED in response to DR 48).

RESPONSE 7:

SoCalGas objects to this request on the grounds it is vague and ambiguous, including with respect to the phrase "physical condition." SoCalGas also objects to this request on the grounds it is duplicative, seeks information that is already in the possession of SED, and is unduly burdensome. SoCalGas further objects to the extent that it assumes that Boots & Coots did not gather information regarding the physical condition of well SS-25 through the personal observations of its personnel on site during the leak period. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. For information regarding Well SS-25 conveyed to Boots & Coots via written communications, please see Response 5. In addition, Boots & Coots were on site at the facility and were provided access to the well, well file and well records. Additional information may also have been provided during the course of meetings or conversations at the facility.

QUESTION 8:

Why was Mr. Walzel not the Senior Well Control Engineer for Boots & Coots on SS-25 after kill attempt 6?

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RESPONSE 8:

SoCalGas objects to this request on the ground it is argumentative and seeks information that is not in the possession, custody, or control of SoCalGas. SoCalGas additionally objects to this request to the extent it is duplicative and seeks information that is already in the possession of SED. Subject to and without waiving the foregoing, SoCalGas responds as follows. Please refer to Exhibit III-4 of Exhibit SoCalGas-09 (Danny Walzel Deposition transcript).

QUESTION 9:

Did SoCalGas request that Mr. Walzel be replaced after kill attempt 6?

RESPONSE 9:

No.

QUESTION 10:

If the answer to question 9 is yes, please explain.

RESPONSE 10:

N/A.

QUESTION 11:

Provide all documents showing SoCalGas' communications related to any request that Mr. Walzel be replaced.

RESPONSE 11:

N/A.

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QUESTION 12:

Please refer to AC_CPUC_SED_DR_33_0000024, top of page, Message from Todd Van de Putte to Glen La Fevers dated 10/23/2015. In the memo, second line "Once we get the wireline plug in place, the reservoir should be isolated." With this passage in mind, please answer:

- a. Explain why SoCalGas did not plug SS-25 as initially planned per this message.

Provide all documents upon which the explanation in response to question 12a is based.

RESPONSE 12:

Setting a wireline plug is among several options for killing a well by top kill but is not necessary. After Mr. Van de Putte sent the referenced message on October 23, 2015, SoCalGas determined, based on the information available at that time, that it was not advisable to set a wireline plug as part of the first kill attempt as it could cause a restriction in the well.

QUESTION 13:

Refer to AC_CPUC_SED_DR_33_0000060. The second bullet, of this document states "Western Wireline is onsite but on standby should we decide to set a plug. Due to the configuration of the tubing hardware below the packer, we are not certain Wireline it is possible to set a stable plug below the empty Camco safety nipple (communication port between casing and tubing below the packer)." With this passage in mind, please answer:

- a. Explain in detail what the "configuration of the tubing hardware below the packer" was on October 24, 2015.
- b. What is the significance of the "communication port between casing and tubing below the packer" in planning to Top Kill SS-25?
- c. Were Boots & Coots personnel informed of a problem in the tubing of SS-25 that would prohibit installing a plug in the SS-25 tubing? If yes, please answer the following:

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- i. Who informed Boots & Coots?
 - ii. When were they informed of the problem?
 - iii. How was the problem described to them?
 - iv. Provide all communications related to questions 13ci, 13cii, and 13ciii.
 - v. Provide all documents related to the answers provided.
- d. Were Boots & Coots personnel advised of communication port between casing and tubing below the packer prior to Top Kill 2? If yes, please answer the following:
- i. Who advised Boots & Coots?
 - ii. When were they advised of the issue?
 - iii. How was the problem described to them?
 - iv. How did Mr. Walzel account for this issue in his SS-25 Top Kill Models?
 - v. Provide all communications that support SoCalGas' responses to questions 13di, 13dii, 13diii, and 13div.

RESPONSE 13:

SoCalGas objects to this request to the extent that it assumes that AC_CPUC_SED_DR_33_0000060 represented a final description of the SS-25 well kill update for October 24, 2015. As evident from the document itself, this document represents a draft email from Mr. Egbert to Mr. Van de Putte. See also, Evidentiary Hearing (May 19) Tr. at 2793 (R. Schwecke).

- a. Please see the SS-25 well schematic provided on Page 2 of Ex. SoCalGas-01 – Testimony of Dan Neville.
- b. Please see the Ex. SoCalGas-02 – Testimony of Rodger Schwecke. During a tubing kill procedure, fluid is pumped down the tubing, then exits through ports in the bottom of the tubing into the production casing, just above the reservoir depth.
- c. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term “problem.” This ambiguity renders the request unintelligible. Subject to and without waiving the foregoing, SoCalGas responds as follows. Boots and Coots was provided a schematic of the SS-25 well and had conversations with SoCalGas personnel regarding the tubing string. Please refer to SoCalGas' Response to Safety and Enforcement Division Data Request 48, Q4a.

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- d. SoCalGas objects to this request to the extent that it assumes facts about the SS-25 well bore geometry that are incorrect. Subject to and without waiving the foregoing, SoCalGas responds as follows. No. SoCalGas did not inform Boots & Coots personnel of a communication port between casing and tubing below the packer because the communication port between the casing and tubing resides above the packer. See Evidentiary Hearing (May 19) Tr. at 2793 – 2794 (R. Schwecke).
- i. N/A.
 - ii. N/A.
 - iii. N/A.
 - iv. N/A.
 - v. N/A.

QUESTION 14:

Refer to AC_CPUC_SED_DR_33_0000060. The closing sentence says “We plan to remotely kill the well without setting a plug.”

- a. At the time this email was written, was there a hydrate obstruction in the tubing?
- b. If the answer to question 14a is no, was the hydrate created during this first Top Kill?
- c. If the answer to question 14a is yes:
 - i. Why didn't SoCalGas know the fluid they planned to pump into SS-25 tubing would freeze?
 - ii. Did SoCalGas provide details of this first Top Kill to Boots & Coots?
 - iii. Who provided details of the first Top Kill to Boots & Coots?
 - iv. Who from Boots & Coots received details of the first Top kill from SoCalGas?
 - v. What date ranges was Boots & Coots provided details of the first Top Kill problem and
 - vi. How was the cause of the first Top Kill failure described to Boots and Coots?
 - 1. Provide documents showing all communications between SoCalGas and Boots & Coots related to the first top kill attempt supporting SoCalGas' responses to question 16b iii1- 4.
 - vii. If the answer to question 14bii is no, please explain why not.

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- d. The statement quoted above from AC_CPUC_SED_DR_33_0000060 refers to “remotely” killing the well. Was the remote well kill system used during the first Top Kill of SS-25?
- e. If the answer to question 14d is no, what was meant by this sentence?

RESPONSE 14:

SoCalGas objects to this request to the extent that it assumes that AC_CPUC_SED_DR_33_0000060 represented a final description of the SS-25 well kill update for October 24, 2015. As evident from the document itself, this document represents a draft email from Mr. Egbert to Mr. Van de Putte. See also, Evidentiary Hearing (May 19) Tr. at 2793 (R. Schwecke).

- a. The hydrate obstruction was unknown at the time the email was written.
- b. N/A. See Response 14a.
- c. (i)-(vii) See Response 14a. See also Ex. SoCalGas-02 - Opening Testimony of Rodger Schwecke ([SoCalGas-02.pdf](#)). On October 24, 2015, SoCalGas conducted a tubing kill on SS-25. While the tubing kill was occurring, the tubing pressure began to increase rapidly, indicating a possible blockage in the tubing at a relatively shallow depth. Accordingly, the tubing kill attempt was aborted, and SoCalGas then attempted to pump fluid directly into the annular space between the production casing and tubing to bypass the potential tubing blockage. SoCalGas provided Boots & Coots personnel with information regarding the SS-25 well and the pending situation before they traveled so they were familiar with the well design on arrival.
- d. No. See Evidentiary Hearing (May 19) Tr. at 2817 - 2818 (R. Schwecke).
- e. The well kill system was not utilized to remotely kill SS-25 for the first well kill attempt performed by SoCalGas since there was direct access to the SS-25 wellhead. See Evidentiary Hearing (May 19) Tr. at 2817 - 2818 (R. Schwecke) [“Ultimately we connected to the wellhead and did not use the remote kill piping that was available because it was not needed and connecting directly to the wellhead is a much better situation when you’re attempting to kill a well.”].

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QUESTION 15:

See AC_CPUC_SED_DR_16_0043478, titled "Dynamic Kill Analysis", a Boots & Coots document dated 01/15.

- a. Is it SoCalGas' understanding that this document describes the Drill Bench program used by Mr. Walzel on his laptop to simulate Top Kills for SS-25?
- b. At the top right, the following statement appears "Dynamic kill simulations include hydraulic analysis, temperature profile, fluid PVT, reservoir performance and flowpath amongst additional inputs necessary for accurate modeling."
(Emphasis added)
 - i. With regards to the listed statement in question 15b, provide all communications and documents that were provided to Mr. Walzel that:
 1. Delivered the inputs listed that were necessary for accurate modeling.
 2. Delivered "additional" inputs to Mr. Walzel that were necessary for his modeling.
 - ii. List the "additional inputs necessary for accurate modeling".
 - iii. If SoCalGas cannot provide copies of everything given to Mr. Walzel in response to question 15bi(1-2) and 15bii:
 1. Say so.
 2. Identify the sources of that information and the SoCalGas personnel and contractors who were responsible for providing the information to Mr. Walzel.
 - iv. Did SoCalGas tell Mr. Walzel about communication between the tubing and the casing through slots in the tubing?
 - v. If the answer to question 15iv is yes, provide documentation of that communication.
 - vi. Did SoCalGas communicate with Mr. Walzel that there might be a leak at the bottom of SS-25 either through failed Water Shut Off in the casing, or a leak above the shoe?
 - vii. If the answer to question 15bvi is yes, provide the communications between SoCalGas and Mr. Walzel that support this answer.

RESPONSE 15:

- a. SoCalGas cannot confirm whether "1/15" as reflected on Document

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AC_CPUC_SED_DR_16_0043478 indicates a specific date. Document AC_CPUC_SED_DR_16_0043478 reflects an attachment to email correspondence, dated December 7, 2015, which was previously produced to SED. Document AC_CPUC_SED_DR_16_0043478 provides a general description of Boots & Coots' services with respect to "relief well planning." This document does not specifically reflect analysis or modeling done by Boots & Coots in connection with its SS-25 well control activities.

- b. See Response 15.a. Document AC_CPUC_SED_DR16_0043478 provides a description of Boots & Coots' services with respect to "relief well planning." Mr. Walzel was not involved in the relief well planning.

QUESTION 16:

Explain why, in SoCalGas' opinion, top kills 2-6 failed. Provide all documents not already provided that were created by SoCalGas personnel, consultants and contractors and that analyzed top kills 2-6 and rendered opinions and conclusions regarding why those top kills failed.

RESPONSE 16:

SoCalGas objects to this request as vague, ambiguous, and unintelligible. SoCalGas further objects to this request as overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas understands that the top kill attempts were not successful because the pump operations were unable to achieve a stable hydrostatic head necessary to control the well. See also, pages 8-14 of Ex. SoCalGas-02 - Opening Testimony of Rodger Schwecke ([SoCalGas-02.pdf](#)) which details SoCalGas' top kill efforts at well SS-25.

QUESTION 17:

Please refer to AC_CPUC_SED_DR_17_0001810. Emails to and from Steve Cardiff. Describe Mr Cardiff's roll related to killing Well SS-25 from October 23, 2015 through February 27, 2016.

RESPONSE 17:

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Mr. Cardiff was involved in the leak response, but not involved in the kill operations for the SS-25 well.

QUESTION 18:

From October 23, 2015 through February 27, 2016, did Mr. Cardiff provide information to Boots & Coots either directly or indirectly through a third party, or both?

RESPONSE 18:

See Response 5.

QUESTION 19:

If the answer to question 18 is yes,

- a. Provide the information Mr. Cardiff provided to Boots & Coots directly.
- b. Provide the information Mr. Cardiff provided indirectly to Boots & Coots through a third party.
- c. Provide the entire set of communications that included the information provided in response to questions 19a and 19b.

RESPONSE 19:

See Response 5.

QUESTION 20:

For this next set of questions, refer to AC_CPUC_SED_DR_17_0001820, an email regarding SS-25 Well View data provided By Ms Razavu to Todd Van de Putte, Steve Cardiff and Amy Kitson. Refer also to AC_CPUC_SED_DR_17_0001823, the Well View image referenced in the email.

- a. Was this information provided to Mr. Walzel?
- b. Was this information provided to Dr. Haghshenas?
- c. This Well View image shows a safety system installed in the tubing. What was the name of that safety system?

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RESPONSE 20:

- a. SoCalGas objects to this request as vague and ambiguous with respect to the phrase "this information." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See Response 5. SoCalGas provided Boots & Coots personnel with information regarding the SS-25 well, including a well schematic with this information.
- b. SoCalGas objects to this request as vague and ambiguous with respect to the phrase "this information." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See Response 20a.
- c. Camco SC-1 safety system.

QUESTION 21:

For this next set of questions, refer to the following:

-AC_CPUC_SED_DR_17_0001820, an email regarding SS-25 Well View data provided By Ms Razavu to Todd Van de Putte, Steve Cardiff and Amy Kitson. - AC_CPUC_SED_DR_17_0001823, the Well View image referenced in the email. -AC_CPUC_SED_DR_33_0000060. The second bullet, of this document, dated October 24, 2015, which states "Western Wireline is onsite but on standby should we decide to set a plug. Due to the configuration of the tubing hardware below the packer, we are not certain Wireline it is possible to set a stable plug below the empty Camco safety nipple (communication port between casing and tubing below the packer)." With this passage in mind, please answer:

- a. Identify where on this list of Well View data, or on the Well View image, there is an indication of a problem with the "configuration of the tubing hardware below the packer" that might make it difficult to install a plug.
- b. On October 23, 2015 who in SoCalGas was aware of a problem with the "configuration of the tubing hardware below the packer" that might make it difficult to install a plug?
 - i. How did that person or those people become aware of the problem?
 - ii. Did that person or those people describe the problem to Boots & Coots?
 - iii. Other than preventing installation of a plug in Well SS-25, what additional problems did the configuration of the tubing hardware below the packer present in Top-killing SS-25?

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- iv. How did Mr. Walzel account for this tubing hardware configuration in his SS-25 Top Kill models?
- v. How did Dr. Haghshenas account for this tubing hardware configuration in his SS-25 Top Kill models?

RESPONSE 21:

- a. SoCalGas objects to this request to the extent that it assumes that AC_CPUC_SED_DR_33_000060 represented a final description of the SS-25 well kill update for October 24, 2015. As evident from the document itself, this document represents a draft email from Mr. Egbert to Mr. Van de Putte. See also, Evidentiary Hearing (May 19) Tr. at 2793 (R. Schwecke). SoCalGas further objects to this request to the extent that it assumes facts about the SS-25 well bore geometry that are incorrect. SoCalGas further objects to this request as vague and ambiguous, including with respect to use of the term "problem." This ambiguity additionally renders the request unintelligible. Subject to and without waiving the foregoing, SoCalGas responds as follows. The WellView schematic shows the tubing configuration of the well.
- b. SoCalGas objects to this request to the extent that it assumes that AC_CPUC_SED_DR_33_000060 represented a final description of the SS-25 well kill update for October 24, 2015. As evident from the document itself, this document represents a draft email from Mr. Egbert to Mr. Van de Putte. See also, Evidentiary Hearing (May 19) Tr. at 2793 (R. Schwecke). SoCalGas further objects to this request to the extent that it assumes facts about the SS-25 well bore geometry that are incorrect. SoCalGas further objects to this request as vague and ambiguous, including with respect to use of the term "problem." This ambiguity additionally renders the request unintelligible. Subject to and without waiving the foregoing, SoCalGas responds as follows. Well records illustrated, and SoCalGas personnel were aware of, the tubing configuration of the well.

QUESTION 22:

Refer to AC_CPUC_0208783, dated 10/25/2015. In the first section, note the statement

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“the well currently has an old disabled Camco subsurface safety valve system in the 2-7/8’ tubing string place and a Gas lift mandrel above it in the tubing string.”

- a. What is the significance of this statement in the context of this report?
- b. Who wrote this Daily Operations report?
- c. Was this Daily Operations report provided to Boots & Coots?
- d. If the answer to question 24c is yes, when was it provided to Boots & Coots?

RESPONSE 22:

- a. SoCalGas objects to this request as vague and ambiguous, in particular with respect to the terms “significance of this statement” and “context of this report.” The identified statement provides an explanation of the characteristics of the SS-25 well.
- b. Alan Fortenberry.
- c. SoCalGas cannot verify confirm whether the referenced Daily Operations Report was provided to Boots & Coots. The information contained in the report was communicated to Boots & Coots. SoCalGas personnel provided information regarding the first well kill attempt in-person, including at the October 24 all hands meeting, after Boots & Coots had arrived on site at Aliso Canyon.
- d. SoCalGas understands this request to pertain to SoCalGas’ response to question 22.c, not 24.c. N/A.

QUESTION 23:

If there was a problem with the configuration of the tubing hardware below the packer, why didn’t SoCalGas pull the tubing and repair the problem before SS-25 failed on October 23, 2015?

RESPONSE 23:

SoCalGas objects to this request to the extent that it assumes that AC_CPUC_SED_DR_33_0000060 represented a final description of the SS-25 well kill update for October 24, 2015. As evident from the document itself, this document represents a draft email from Mr. Egbert to Mr. Van de Putte. See also, Evidentiary Hearing (May 19) Tr. at 2793 (R. Schwecke). SoCalGas further objects to this request

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to the extent that it assumes facts about the SS-25 well bore geometry that are incorrect. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to use of the term "problem." Subject to and without waiving the foregoing, SoCalGas responds as follows. SoCalGas understands that reference to the "configuration of the tubing hardware," describes the housing of the Camco SSSV. This hardware existed above the packer, not below.

QUESTION 24:

Refer to AC_CPUC_SED_DR_33_0000060, statement "Cameron did identify the wellhead seals aren't holding . . ."

- a. Were the SS-25 wellhead seals already leaking at the time SS-25 failed on October 23, 2015?
- b. Provide records showing when the wellhead seals were operating properly and not leaking prior to October 23, 2015?
- c. Were the wellhead seals repaired prior to the Top Kills performed by Boots & Coots?
 - i. If the answer to question 24c is NO, what affect did the failed wellhead seals have on the Top Kill attempts of SS-25?
 - ii. Was Boots & Coots aware of the failed wellhead seals prior to attempting to Top Kill SS-25?
- d. On the same document AC_CPUC_SED_DR_33_0000060, near the bottom see statement "We currently have the Baker tank, and the Halliburton pump truck next to the remote kill header on the location."
 - i. Is the "remote kill header" referenced here part of the remote kill system installed at Aliso Canyon?
 - ii. Was Boots & Coots aware of the Aliso Canyon remote kill system? Yes
 - iii. Why was the remote kill system not used by Boots & Coots for Top Kills 2-7?

RESPONSE 24:

a.-c. SoCalGas objects to this request to the extent that it assumes that AC_CPUC_SED_DR_33_0000060 represented a final description of the SS-25 well kill update for October 24, 2015. As evident from the document itself, this document represents a draft email from Mr. Egbert to

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Mr. Van de Putte. See also, Evidentiary Hearing (May 19) Tr. at 2793 (R. Schwecke). Subject to and without waiving the foregoing, SoCalGas responds as follows. SoCalGas is unable to identify the language referenced in this request in document AC_CPUC_SED_DR_33_0000060.

d. SoCalGas objects to this request to the extent that it assumes that AC_CPUC_SED_DR_33_0000060 represented a final description of the SS-25 well kill update for October 24, 2015. As evident from the document itself, this document represents a draft email from Mr. Egbert to Mr. Van de Putte. See also, Evidentiary Hearing (May 19) Tr. at 2793 (R. Schwecke). Subject to and without waiving the foregoing, SoCalGas responds as follows. SoCalGas is unable to identify the language referenced in this request in document AC_CPUC_SED_DR_33_0000060.

QUESTION 25:

For this next set of questions, refer to AC_CPUC_SED_DR_33_0000109.

- a. Is it correct that this sketch shows a Camco 2 1/2" subsurface safety valve at 8451 feet in depth with a 2.313" internal diameter?
- b. Was this sketch provided to Boots & Coots?
- c. If this sketch was provided to Boots & Coots:
 - i. Why?
 - ii. When was it provided to Boots & Coots?
 - iii. Provide the unredacted communication showing the date this communication was provided to Boots & Coots.
- d. If this sketch was not provided to Boots & Coots, why not?

RESPONSE 25:

- a. AC_CPUC_SED_DR_33_0000109 describes a Camco 2 1/2" SSSV at 8451'.
- b. Yes.
- c.
 - i. SoCalGas provided Boots & Coots personnel with information regarding the SS-25 well and the pending situation before they traveled so they were

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familiar with the well design on arrival.

ii. SoCalGas first provided the SS-25 well schematic to Boots & Coots on October 24, 2015.

iii. SoCalGas objects to this request as duplicative of prior requests. See AC_CPUC_SED_DR_16_0006302. See also, SoCalGas' Response to SED Data Request 48.

d. N/A.

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(excluding Questions 1a, 7, 16, and 18)**

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SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated October 7, 2021 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' responses do not include information collected or modeled by Blade Energy Partners' during its Root Cause Analysis Investigation. 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:

For this next set of questions, refer to AC_CPUC_SED_DR_16_0018056. See memo dated Nov 3, 2015 from Steve Cardiff to Art. In particular, see the statement "Todd provided a list of wells that HES has abandoned for SoCalGas. Please refer to these wells for details regarding the abandonment cement."

- a. Was this information provided to Boots & Coots for purposes associated with the SS-25 Top Kill attempts?
- b. Confirm that as early as November 3, 2015 SoCalGas was planning to

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abandon SS-25.

c. When did SoCalGas first decide that it might abandon SS-25?

d. Why was SoCalGas already planning to abandon SS-25 on or before Nov 3, 2015?

RESPONSE 1:

- a. SoCalGas objects to this request as vague and ambiguous, specifically with respect to the phrase "this information." Subject to and without waiving the forgoing objection, SoCalGas responds as follows. Yes.
- b. SoCalGas was planning for the potential abandonment of SS-25, as a contingency, as early as November 3, 2015. SoCalGas submitted a Notice of Intent to abandon well SS-25 on March 30, 2018.
- c. SoCalGas objects to this request as vague and ambiguous, specifically with respect to the phrase "first decide." Subject to and without waiving the forgoing objection, SoCalGas responds as follows. SoCalGas submitted a Notice of Intent to abandon well SS-25 on March 30, 2018.
- d. SoCalGas objects to this request to the extent that it assumes facts that do not exist. Subject to and without waiving the forgoing objection, SoCalGas responds as follows. See response to Question 1.c.

QUESTION 2:

Please refer to AC_BLD_0076009, Core Lab Report dated November 8, 2015, page 6, Observations 1. With this document in mind, please answer:

- a. Did Boots & Coots receive this report?
- b. Did the results of this Completion Profile Analysis influence and/or inform the Top Kill plans by Boots & Coots? If so, how?
- c. The description in these bullets indicates gas was flowing into the tubing from the reservoir, then exiting into the tubing-casing annulus at what is termed a tubing failure at 8435 feet. SoCalGas previously explained that the cross-over ports were at this depth. With this in mind, please answer, Prior to October 23, 2015, was SoCalGas able to close the cross-over ports within well SS-25 so that gas could be produced or injected only through the tubing, but not the annulus between the tubing and casing?
- d. If these cross-over ports were always open prior to October 23, 2015, could

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SoCalGas inject gas through the tubing into the reservoir? If yes, explain how that worked, including how gas was prevented from flowing up the tubing-casing annulus.

e. If the cross-over ports were always open, how would it be possible to pump kill fluid down the tubing to kill the well without losing the fluid via the tubing-casing annulus?

f. Refer to bullet 4, which says: "A cooling anomaly appears to detect a leak through the surface casing at about 890" (depth confirmed with both down and up log pass temperatures). Confirm that by November 3, 2015, SoCalGas and Boots & Coots knew there was evidence of a leak through the surface casing at about 890'.

RESPONSE 2:

- a. SoCalGas objects to this request as unduly burdensome and harassing, and to the extent that the information is equally available to SED. Subject to and without waiving the forgoing objection, SoCalGas responds as follows. See SoCalGas's Response to SED Data Request 81, Questions 7-9.
- b. SoCalGas objects to this request as vague and ambiguous, specifically with respect to the phrase "influence and/or inform the Top Kill plans." Subject to and without waiving the forgoing objection, SoCalGas responds as follows. See SoCalGas's Response to SED Data Request 81, Questions 7-9.
- c. No.
- d. No; the cross-over ports provided communication between the tubing and the casing.
- e. Please see the Ex. SoCalGas-02 – Testimony of Rodger Schwecke. When the downward force of the fluid weight, known as a hydrostatic head, balances the upward force of the pressurized gas, the well becomes isolated from the reservoir and stops any flowing gas, and the well is "killed." Well kills are typically performed by pumping fluid into a well's tubing, which is the smaller steel pipe within the well's production casing that extends from the surface to nearly the depth of the reservoir. During a tubing kill procedure, fluid is pumped down the tubing, then exits through ports in the bottom of the tubing into the production casing, just above the reservoir depth.
- f. SoCalGas objects to this request as unduly burdensome and harassing, and to the extent that the information is equally available to SED. SoCalGas further

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objects to the extent this request assumes that there was a leak in the surface casing at 890'. Subject to and without waiving the forgoing objection, SoCalGas responds as follows. See SoCalGas's Response to SED Data Request 81, Question 17.

QUESTION 3:

Please refer to AC_BLD_0076009, Core Lab Report dated November 8, 2015, page 6, Observations 2. Refer to the third bullet, third to last sentence. "A subsequent tubing plug run set a plug just above the top pup joint above the Camco SSSV. A setting depth was not reported but is estimated to be around 8380'. The plug run confirms no gas flow inside the tubing down to the plug setting depth and of course the plug did not shut off the gas flow to surface." With this passage in mind, please answer the following:

- a. Confirm that Core Labs assumed there was a Camco SSSV installed in the SS-25 tubing.
- b. If SoCalGas cannot confirm the assumption in question 3ai, provide evidence of exactly what SoCalGas or Boots & Coots told Core Labs regarding the status of the Camco SSSV in the tubing.

RESPONSE 3:

- a. SoCalGas understands that the Core Lab Report's reference to "Camco SSSV" is to the Camco SSSV housing that remained in well SS-25 after the valve was removed.
- b. N/A.

QUESTION 4:

Please refer to AC_CPUC_SED_DR_16_0019702, Western Wireline Temperature log of SS-25 dated November 9, 2015. With that document in mind, please answer the following:

- a. Did SoCalGas or Boots & Coots order this temperature log?
- b. Were the results provided to Boots & Coots?
- c. Does this temperature log confirm that the leak(s) in SS-25 were above the 1400' well depth?
- d. If the answer to question 4c is no, please explain why not.

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- e. By November 9, 2015, did Boots & Coots tell SoCalGas that they might not be able to Top Kill SS-25?
- f. At any time between October 25, 2015 and December 27, 2015, did Boots & Coots communicate with SoCalGas to abandon SS-25?
 - i. If yes, when did Boots & Coots first provide this communication?
 - ii. Did Boots & Coots recommend abandonment from the top of the well?
 - iii. If the answer to question 4 f ii is yes, when did they make this recommendation?
 - iv. Did Boots & Coots recommend abandonment with a relief well? If yes, when did they make this recommendation?
- g. What date did SoCalGas decide to abandon well SS-25?
- h. What other factors about SS-25 were known by SoCalGas when SoCalGas determined that the well might have to be abandoned and that a relief well might be necessary?

RESPONSE 4:

- a. Please see Ex. SoCalGas-02 – Testimony of Rodger Schwecke. On October 25, 2015, Boots & Coots began assessing SS-25 and determined that the obstruction in the SS-25 tubing was a hydrate. Boots & Coots further determined that the hydrate should be cleared so that additional diagnostic testing could be conducted by lowering sensors and other measurement tools through the tubing and so a well kill attempt could be undertaken through the tubing.
- b. See Response 4.a. During the leak, results of diagnostic testing were provided to Boots & Coots.
- c. Please see Ex. SoCalGas-02 – Testimony of Rodger Schwecke.
- d. N/A.
- e. SoCalGas personnel do not specifically recall whether by November 9, 2015, Boots & Coots told SoCalGas that they might not be able to Top Kill SS-25.
- f. See Response 4.e.
- g. See Response 1.c.
- h. See Response 4.e.

QUESTION 5:

Who in SoCalGas as of October 23, 2015, was the most knowledgeable about the history and configuration of SS-25? With this document in mind, please answer:

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- a. Did the person identified by SoCalGas in response to Question 5 share his knowledge about SS-25 with Boots & Coots?
- b. If the answer to question 5a is yes, what dates was that information conveyed to Boots & Coots?
- c. If the answer to question 5a is yes, how (for instance, first person meetings, phone call, radio, email, letters) was that information conveyed to Boots & Coots?
- d. What information about well SS-25 was provided by the person identified by SoCalGas in response to Question 5 to Boots & Coots that is not documented in any records provided to SED in response to data requests in this proceeding?

RESPONSE 5:

SoCalGas objects to this request as unintelligible, in particular because it references "this document" without identifying any document. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas cannot identify a specific individual who was the most knowledgeable about the history and configuration of SS-25 as of October 23, 2015. However, the Aliso Canyon storage field engineers would have been the most familiar with the well files which contain the configuration and history of the wells. Well file and well information were shared with Boots & Coots, including prior to their arrival on site at Aliso Canyon.

QUESTION 6:

Please refer to AC_BLD_0075868, Kill Procedure SS-25 Nov 12, 2015. With this document in mind, please answer:

- a. It is SED's understanding from SoCalGas's previous responses to SED DRs that this document was prepared by Danny Walzel of Boots & Coots. If this understanding is incorrect, please provide a correction that identifies all preparers of this document.
- b. Was the process of setting an Easy Set Safety Valve (EZSV) in the tubing (#5), then perforating the tubing (#13) recommended by Boots & Coots?
- c. If the answer to question 6a is no, who recommended doing this?
- d. What was expected to be accomplished relative to killing SS-25 by setting an EZSV at about 8390 ft and perforating the tubing above the EZSV?
- e. How did Boots & Coots expect this "kill procedure" to kill SS-25?

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- f. From Boots & Coots' subsequent analysis, why didn't this kill procedure work?
- g. Did Boots & Coots leave the EZSV in place in the SS_25 tubing for later SS-25 kill attempts?
- h. If the answer to question 6f is no, when was it removed?
- i. If the answer to question 6f is no, why was it removed?

RESPONSE 6:

- a. SoCalGas understands that Boots & Coots created AC_BLD_0075868.
- b. Yes.
- c. N/A.
- d. SoCalGas understands that the goal for installing the EZSV was to facilitate a top-kill through the tubing. SoCalGas understands that installing the EZSV plug was to create a known flow path through the tubing through which kill fluids could be pumped.(See Exhibit SoCalGas-09 at 9.0295).
- e. SoCalGas cannot speculate regarding what Boots & Coots knew or expected. See Response 6.d.
- f. SoCalGas does not understand what is meant by "Boots & Coots' subsequent analysis."
- g. Yes.
- h. N/A
- i. N/A.

QUESTION 7:

Please refer to AC_CPUC_SED_DR_16_0043472, email letter dated Nov 12, 2015 to Boots & Coots re Aliso Canyon Storage Facility Leak Response. With this in mind, please answer:

- a. In the second paragraph, one sentence says: "Any conversations or communications with, or documents or work requested by or provided to, attorneys for SoCalGas or L&W are covered by the attorney-client privilege and should be kept confidential and shared only with members of the Law Department, L&W or SoCalGas employees working with counsel."
 - i. On what basis did SoCalGas and L&W attorneys believe Boots & Coots were clients?
 - ii. How did the SoCalGas Law Department assist SoCalGas in

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investigating the circumstances surrounding the leak ...”?

iii. At any time, did the SoCalGas or L&W attorneys direct Boots & Coots to perform any work related to the killing of well SS-25?

iv. If the answer to question 7aiii is anything other than an unqualified “no,” provide all documents showing the directions SoCalGas or L&W attorneys gave to Boots & Coots to perform any work related to the killing of well SS-25.

RESPONSE 7:

- i. The letter does not refer to Boots & Coots as a client of SoCalGas or Latham & Watkins.
- ii. The SoCalGas Law Department provided legal support to SoCalGas in response to the incident, including but not limited to, by providing legal counsel regarding discovery responses, retention of evidence, drafting and reviewing contracts for services and interpreting legal requirements and standards
- iii. SoCalGas or L&W attorneys did not direct Boots & Coots to perform any work related to the killing of Well SS-25.
- iv. N/A.

QUESTION 8:

Please refer to AC_CPUC_SED_DR_16_0000343, Boots & Coots Daily Report dated Nov 13, 2015, reporting the Nov 12, 2015 kill attempt. Specifically, look at text shown next to 14:00 – 17:00. With this in mind, please answer:

- a. Was the purpose of the junk shots to plug the hole in the 7” casing that was thought to exist above 1700 ft well depth?
- b. If not, what was the purpose of the junk shots on November 12, 2015?
- c. Text next to 17:00-17:45 states: “End of Day meeting. Discussed pumping junk shot to plug hole in 7” casing and pumping barite pill out of perfs in tubing.”
 - i. Who was present in this “End of Day” meeting?
 - ii. Were minutes or notes kept by anyone of this meeting?
 - iii. If the answer to question 8cii is yes, who kept the minutes?
 - iv. Please produce all minutes and/or notes from the “End of Day

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meeting”.

v. Were the attendees, including Boots & Coots, discussing pumping a junk shot to plug the hole in the 7” casing and pumping a barite pill out of the perfs in the tubing PROSPECTIVELY – i.e, it had not happened yet but might in the future, or RETROSPECTIVELY – i.e., discussing the results of what was just done that day?

vi. What did Boots & Coots say about pumping junk shot to plug hole in 7” casing and pumping barite pill out of perfs in tubing?

RESPONSE 8:

- a. The kill attempt occurred on November 13, 2015.
AC_CPUC_SED_DR_16_0000343 is a Boots & Coots Daily Report and was not prepared by SoCalGas. SoCalGas understands that junk shots are used to plug holes in the casing. (See Exhibit SoCalGas-09 at 9.0301 - 302.)
- b. N/A.
- c. AC_CPUC_SED_DR_16_0000343 is a Boots & Coots Daily Report and was not prepared by SoCalGas. SoCalGas understands this to be a Boots & Coots meeting. The Boots & Coots employee names on location are listed in AC_CPUC_SED_DR_16_0000343.

QUESTION 9:

Please refer to AC_CPUC_0165079, Boots & Coots Daily Report dated Nov 14, 2015 for work performed on Nov 14, 2015. Also Refer to AC_BLD_0075863, dated Nov 14, 2015 titled Barite Pill. With this in mind, please answer:

- a. Confirm that there was not a kill attempt by Boots & Coots on Nov 14, 2015.
- b. On AC_CPUC_0165079 next to 16:30-18:00, the statement “Modified pump line to pump junk shots down 7” annulus.” Given that the Daily Report from Nov 13, 2015 (AC_CPUC_SED_DR_16_0000343) states that Boots & Coots pumped junk shots on Nov 13, what does this statement by Boots & Coots in the Nov 14 Daily Report mean?
- c. What modification to the pump line was made?
- d. Was a second attempt made on November 14 to “pump junk shots down the 7” annulus”?

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RESPONSE 9:

- a. AC_CPUC_0165079 is a Boots & Coots Daily Report and was not prepared by SoCalGas. There was no kill attempt on SS-25 on November 14, 2015.
- b. AC_CPUC_0165079 is a Boots & Coots Daily Report and was not prepared by SoCalGas. SoCalGas understands the pump line was changed to accommodate the pumping of junk shots.
- c. AC_CPUC_0165079 is a Boots & Coots Daily Report and was not prepared by SoCalGas. SoCalGas cannot confirm what specific modifications to the pump line were made.
- d. No.

QUESTION 10:

Please refer to AC_BLD_0075861, titled Barite Pill, Nov 15, 2015. Also refer to AC_BLD_0075864, titled Barite Pill, Nov 15, 2015. With this in mind, please answer:

- a. Confirm that both of these documents were generated by Mr. Walzel of Boots & Coots.
- b. If SoCalGas does not confirm these documents were generated by Mr. Walzel, which one was produced by Mr. Walzel and who produced the one that was not generated by Mr. Walzel?
- c. Why were there two plans for the Top Kill on Nov 15, 2015?
- d. Which plan was implemented by Boots & Coots?

RESPONSE 10:

- a. Please see Exhibit SoCalGas-09 at 9.0412 - 413.
- b. N/A.
- c. AC_BLD_0075861 is a Boots & Coots well kill plan and was not prepared by SoCalGas. See Exhibit SoCalGas-09 at 9.0412 - 418 where Mr. Walzel discusses the well kill plans for November 15, 2015 and November 18, 2015.
- d. AC_BLD_0075861 is a Boots & Coots well kill plan and was not prepared by SoCalGas. Please see Exhibit SoCalGas-09 at 9.0412 - 418 where Mr. Walzel discusses the well kill plans for November 15, 2015 and November 18, 2015.

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QUESTION 11:

Please refer to AC_CPUC_SED_DR_16_0000344, Boots & Coots Daily report dated Nov 15, 2015 for Top Kill attempt on Nov 15, 2015. With this in mind, please answer:

- a. Why did Boots & Coots decide to pump just barite pills and no junk shots down well SS-25 for the Nov 15 Top Kill?
- b. From Boots & Coots' subsequent analysis, why didn't this Nov 15, 2015 kill procedure work?
- c. Did any personnel at SoCalGas, including contractors and consultants, have an opinion different from Boots & Coots regarding why this Nov 15, 2015 kill procedure did not work?
- d. If the answer to question 11c is yes:
 - i. State the name of the person
 - ii. Provide that person's opinion was regarding why this Nov 15, 2015 kill procedure did not work.

RESPONSE 11:

- a. AC_CPUC_SED_DR_16_0000344 is a Boots & Coots Daily Report and was not prepared by SoCalGas. Please see Exhibit SoCalGas-09 at 9.0409 - 418 where Mr. Walzel discusses the well kill attempt on November 15, 2015.
- b. SoCalGas does not understand what is meant in this request by reference to Boots & Coots' "subsequent analysis."
- c. SoCalGas' is not aware whether Boots & Coots, as an organization, had a specific or singular opinion as to why the November 15 well kill attempt did not successfully control the well.
- d. N/A.

QUESTION 12:

Please refer to AC_CPUC_SED_DR_17_0002108, email dated Nov 15, 2015 from Todd Van de Putte to Bruce Hesson (DOG). With this document in mind, please answer.

- a. At item no. 3 in the text, see "run a noise log and/or CBL tool in an attempt to verify the Barite in the 2-7/8" tubing and 7" casing annulus."
 - i. Why would there be Barite in the 2-7/8" tubing from the procedure

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outlined AC_BLD_0075861 or AC_BLD_0075864 and reported on AC_CPUC_SED_DR_16_0000344?

ii. Was the Barite in the 2-7/8" tubing and 7" casing annulus verified?

iii. Did SoCalGas or Boots & Coots run a noise log and/or CBL typ tool as stated in item No.3 in the email AC_CPUC_SED_DR_17_0002108?

iv. If the answer to question 12a.iii is yes, provide the results or cite to bates numbers of documents already provided.

b. Assuming the logs were run on Nov 16, 2015, did the results alter how Boots & Coots planned the next Top Kill for well SS-25?

c. If yes, how?

RESPONSE 12:

a.

i. SoCalGas objects to this request to the degree that it calls for speculation. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. As described in the referenced documents, Boots & Coots pumped the barite pill down well SS-25's 2-7/8" tubing.

ii. [REDACTED] As described in Mr. Van de Putte's November 15, 2015 email correspondence (AC_CPUC_SED_DR_17_0002108), Mr. Van de Putte states that the "estimated work plan for Monday (11-16-15) will be," among other things, to "run a noise log and/or CBL type tool." It appears that the day following Mr. Van de Putte's November 15, 2015, Monday November 16, LEL measurements prevented Boots & Coots from starting equipment at the site due to safety concerns. (See AC_CPUC_SED_DR_16_0025653.)

iii. See Response to Question 12.a.ii.

iv. See Response to Question 12.a.ii.

b. See Response to Question 12.a.ii.

c. See Response to Question 12.a.ii

QUESTION 13:

Please refer to AC_CPUC_SED_DR_16_0000345, Boots & Coots Daily Report dated Nov 18, 2015. With this document in mind, please answer:

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- a. In particular, refer to the entry that states: At 7 AM, "Identified location north of well pad 25 to spot pump, frac tanks and batch mixer."
 - i. Prior to this well kill attempt, where were the pump, frac tanks and batch mixer located relative to well SS-25?
 - ii. If the pump, frac tanks and batch mixer were previously on well pad 25, why were they moved from that location to the one selected for the Nov 18 well kill attempt?
- b. Please explain, using any information or recollections available to SoCalGas and Boots & Coots, as well as references to data recorded on this Nov 18, 2015 Boots & Coots daily report why the well kill attempt on Nov 18, 2015 was unsuccessful.
- c. Refer to the entry that states: At 16:30 – 17:30 "Work continued on secondary pumping location."
 - i. What is meant by a "secondary pumping location" in this statement?
 - ii. Is the referenced "secondary pumping location the one referenced at 7AM "Identified location north of well pad 25 . . ." or was there an additional "secondary" pumping location being set up after the Nov 18 well kill attempt?
 - iii. Where was the secondary pumping location referenced in this statement?
 - iv. Why was Boots & Coots setting up a secondary pumping location?

RESPONSE 13:

- a. i.-ii. AC_CPUC_SED_DR_16_0000345 is a Boots & Coots Daily Report and was not prepared by SoCalGas. Location information may be found on other Boots & Coots Daily Reports. Please refer to Ex. SED-227.
- b. SoCalGas objects to this request to the extent it asks SoCalGas to describe the recollections of Boots & Coots personnel. SoCalGas is not aware whether Boots & Coots, as an organization, had a specific or singular opinion as to why the November 18 well kill attempt did not successfully control the well. SoCalGas understands that the November 18 well kill attempt was not successful because the pump operations were unable to achieve a stable hydrostatic head necessary to control the well.
- c.
 - i. SS-1.

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- ii. See response to 13.c.i.
- iii. See response to 13.c.i.
- iv. A pumping location was constructed away from SS-25 to avoid further delays related to weather and methane levels exhibited at SS-25, which included installation of piping down from the SS-1 well site located typically upwind from SS-25. Exh. SoCalGas-02 at 2.0015.

QUESTION 14:

Please refer to the document with Bates number AC_CPUC_SED_DR_16_0015897, a series of emails dated Nov 19, 2015, between Danny Walzel, Bret Lane and Hilary Petrizzo in which Mr. Lane is obtaining Porosity and permeability for the West Field around Well SS-25 to be provided to Mr. Walzel. With this in mind, please answer:

- a. Why did Mr. Walzel need the porosity and permeability for the West Field around Well SS-25?
- b. Did SoCalGas provide similar data for the West Field around Well SS-25 or SS-1 to Mr. Walzel prior to Nov 19, 2015?
 - i. If yes, identify the porosity and permeability provided to Mr. Walzel prior to Nov 19, 2015.
 - ii. If no, what porosity and permeability data did Boots & Coots use in it's well kill models prior to Nov 19, 2015?

RESPONSE 14:

- a. SoCalGas cannot speak to Mr. Walzel's knowledge or intent with respect to why he needed porosity or permeability.
- b. See SoCalGas's Response to SED 167, Question 5. SoCalGas cannot confirm whether it provided similar information prior to this date.

QUESTION 15:

Please refer to the document with Bates number AC_BLD_0076036, email dated Nov 20, 2015 from Todd Van de Putte to the Department of Oil & Gas Titled SoCalGas – Aliso Canyon – Standard Sesnon 25 – Daily Summary – 11-19-15 / Estimated Work Plan 11-20-15. With this in mind, please answer:

- a. Provide the attachment "SS-25DailyReport11-19-15.png". Please provide the

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b. On page 2, AC_BLD_0076037, the third bullet says: "Run wireline plugs in the wells Standard Sesnon 25A and Standard Sesnon 25B. Please answer:

- i. Did Boots & Coots ask that these wireline plugs be installed in SS-25 A and SS-25B on Nov 20, 2015.
- ii. If Boots & Coots did not request the installation of the plugs in SS_25A and SS-25B, why was SoCalGas anticipating this work for Nov 20, 2015?
- iii. Were these plugs actually installed after Nov 19, 2015?
- iv. If the answer to question 15biii is yes, when were these plugs installed?

RESPONSE 15:

- a. SoCalGas previously provided this document to SED. See Bates AC_BLD_0076038.
- b.
 - i.- iv. Due to the close proximity of SS25A and SS25B to SS25, each well is plugged and filled with kill fluid as a precautionary measure. Re-drilling from SS25A and SS25B would involve the placement of the drilling rig on the blowing gas which would be unsafe. (See SoCalGas Response to December 4, 2015 Data Request from Kan Wai Tong) SoCalGas cannot confirm whether Boots & Coots requested that the wireline plugs be set or whether it was a mutual decision between SoCalGas and Boots & Coots. The plugs in SS-25A and SS-25B were installed on November 21, 2015.

QUESTION 16:

Please refer to the document with Bates number AC_BLD_0075866. Kill.Program, Well 25 Kill Program 11-24-25. With this in mind, please answer:

- a. Is this Kill Program the one used on Nov 24, 2015 to Kill well SS-25?
- b. Was this Kill Program generated by Danny Walzel on his laptop?
- c. If the answer to question 16b is no, who generated this kill program?

RESPONSE 16:

- a. Yes.
- b. AC_BLD_0075866 was created by Boots & Coots. See Exhibit SoCalGas-09 at

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9.0334. SoCalGas does not know whether this document was created on Mr. Walzel's laptop or another computer.

c. N/A.

QUESTION 17:

Refer to the document with Bates number AC_CPUC_SED_DR_16_0000346, Boots & Coots Daily Report dated Nov 24, 2015 for the November 24, 2015 SS-25 Well Kill.

With this in mind, please answer:

- a. At 9:45 – 11:45 it appears that 2081 barrels (105,212 gallons) were pumped into SS-25. Please provide the correct number if this is not right.
- b. According to the document with Bates number AC_BLD_0075866, the 2081 barrels were all pumped down the tubing.
 - i. Did Boots & Coots expect the GEO Zan pill, the Barite Pill and all of the water to go into the gas reservoir below the packer?
 - ii. If the answer to question 17bi is no, how much of the GEO Zan pill, the Barite Pill and all of the water did Boots & Coots expect to pass through the tubing slots into the tubing – casing annulus?
 - iii. Did Boots & Coots expect the fluid that passed through the tubing slots into the tubing-casing annulus to build up in the annulus?
 - iv. If so, to what casing depth would it build under the maximum pressure of 4,067 psi shown on the Daily Report with Bates number AC_CPUC_SED_DR_16_0000346 at 9:45-11:45?
- c. Did Boots & Coots determine where all of the liquid and various pills pumped down SS-25 during this and other kill attempts ended up?
- d. If the answer to question 17c is yes, where did Boots & Coots determine the liquid pumped down SS-25 would end up?
- e. If the answer to question 17c is no, why not?
- f. From Boots & Coots' subsequent analysis, why didn't this Nov 24, 2015 kill procedure work?
- g. Did any personnel from SoCalGas, including contractors and consultants, have an opinion different from Boots & Coots regarding why this Nov 24, 2015 kill procedure did not work?
- h. If the answer to question 17g is yes, state the name of the person and what that person's opinion was regarding why this Nov 24, 2015 kill procedure did not work.

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RESPONSE 17:

- a. AC_CPUC_SED_DR_16_0000346 is a daily report which was created by Boots & Coots. SoCalGas cannot verify 2081 barrels based on the referenced document.
- b. See Response 17.a.
 - i. SoCalGas cannot speculate as to Boots & Coots' expectations. As a general matter, the Geo Zan pill, barite pill and water are intended to stay in the production casing annulus.
 - ii. You would expect the entirety of the pills to go into the casing annulus plus all of the water except the volume of fluid that remains in the tubing between the perforations and the wellhead at the time pumping is completed.
 - iii. Yes.
 - iv. This number is uncertain because it depends on unknown variables including the flow path, geometry of the well bore, friction, bottom hole pressure at the conclusion of the pumping job.
- c. SoCalGas is not aware whether Boots & Coots specifically made such a determination. Depending on the unique circumstances of an incident requiring well control intervention, fluids can remain in the wellbore, be lost to the formation, or return to surface.
- d. N/A.
- e. N/A.
- f. SoCalGas does not understand the phrase "Boots & Coots subsequent analysis."
- g. SoCalGas is not aware whether Boots & Coots, as an organization, had a specific or singular opinion as to why the November 24 well kill attempt did not successfully control the well.
- h. N/A.

QUESTION 18:

Please refer to the document with Bates number AC_BLD_0075867, Well 25 Kill Program 11-25-15. With this document in mind, please answer:

- a. Is this Kill Program the one that was used on Nov 25, 2015 to Kill well SS25?
- b. Was this Kill Program generated by Danny Walzel on his laptop?

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- c. For this Kill attempt, at No. 5, why did Boots & Coots plan to “bleed off 7” casing.”?
- d. For this Kill attempt, at No. 6, why did Boots & Coots plan to follow the bleed off of 7” casing with “pump 100 bbls of GEO Zan pill down tubing?”
- e. On No. 8 “Displace out of the perforations.” Where in SS-25 were these perforations?
- f. On No. 10 “Pump “Junk Shot down 7” casing.” And No. 11, Fill 7” casing with fresh water.”
 - i. Did Boots & Coots anticipate that filling the 7” casing with fresh water would push the junk shot contents downward in the well casing, or float it in the casing?
 - ii. What was the goal of pumping the junk shot down the 7” casing, then filling the 7” casing with fresh water?

RESPONSE 18:

- a. AC_BLD_0075867 was created by Boots & Coots and not SoCalGas. Yes.
- b. AC_BLD_0075867 was created by Boots & Coots and not SoCalGas. See Exhibit SoCalGas-09 at 9.0334. SoCalGas does not know whether this document was created on Mr. Walzel’s laptop or another computer.
- c. SoCalGas cannot speculate as to Boots & Coots’ knowledge or purpose regarding bleeding off the casing.
- d. SoCalGas cannot speculate as to Boots & Coots’ knowledge or purpose regarding the particulars of the well kill design.
- e. AC_BLD_0075867 was created by Boots & Coots and not SoCalGas. SoCalGas understands the referenced language to refer to the perforations in the tubing above the bridge plug.
- f. SoCalGas cannot speculate as to Boots & Coots’ knowledge, intent or what it anticipated to occur. SoCalGas generally understands that the referenced procedure is intended to push the junk shot into the casing annulus and into the path of the leak.

QUESTION 19:

Please refer to the document with Bates number: AC_CPUC_SED_DR_16_0000347, Boots & Coots Daily Report Dated Nov 25, 2015 for SS-25 Well Kill Nov 25, 2015. With

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this document in mind, please answer:

- a. It appears from this Daily Report that Boots & Coots did not pump a Junk Shot down the 7" casing, followed by fresh water. Does SoCalGas agree with this reading of this Daily Report?
- b. If the answer to question 19a is no, what is SoCalGas' reading of this Daily Report?
- c. At the entry 11:00-16:00, it states: "Flowline from 7" and tubing head broke. Nipple on well head broke, Pump line to 7" casing head broke."
 - i. What caused this damage?
 - ii. Did Boots & Coots begin pumping the Junk Shot down the 7" casing before the tubing head, Nipple on well head broke and Pump line to 7" casing head broke?
- d. From Boots & Coots' subsequent analysis, why didn't this Nov 25, 2015 kill procedure work?
- e. Did anyone in SoCalGas have an opinion different from Boots & Coots regarding why this Nov 25, 2015 kill procedure did not work?
- f. If the answer to question 19e is yes, state the name of the person.
- g. If the answer to question 19e is yes, what was that person's opinion regarding why this Nov 24, 2015 kill procedure did not work.

RESPONSE 19:

- a. AC_CPUC_SED_DR_16_0000347 was created by Boots & Coots and not SoCalGas. Based on AC_CPUC_SED_DR_16_0000347 and the prepared kill program for the November 25 kill attempt (see AC_BLD_0002191 or Exh. SoCalGas-09 at 9.0452), it appears that Boots & Coots shut down operations due to equipment failure prior to pumping the planned junk shot.
- b. N/A.
- c.
 - i. AC_CPUC_SED_DR_16_0000347 was created by Boots & Coots and not SoCalGas. See Exhibit SoCalGas-09 at 9.0423 - 425. SoCalGas does not know what specifically caused the damage. As a general matter, pumping in well kill operations causes vibrations at the well head which may result in damage to certain equipment.
 - ii. SoCalGas understands this request to be asking whether Boots & Coots began pumping the Junk Shot down the 7" casing on November

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25, 2015 before the equipment failures occurred (as opposed to junk shots performed prior to November 25). See Response to 19.a.

- d. SoCalGas does not understand what this request is referring to by "Boots & Coots subsequent analysis" related to this kill attempt.
- e. SoCalGas is not aware whether Boots & Coots, as an organization, had a specific or singular opinion as to why the November 25 well kill attempt did not successfully control the well.
- f. N/A.
- g. N/A.