

**SoCalGas-127**

**SED's Response to SoCalGas' Data Request 9.**

**I.19-06-016**

**ALJs: Hecht/Poirier**

**Date Served: March 15, 2021**

Safety and Enforcement Division Response to Southern California Gas Company's Data Request 9.  
Date Registered: April 17, 2020 (Served on April 16, 2020, but after 5 pm)  
Requested Due Date: April 30, 2020.

1. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to well integrity management of underground gas storage facilities? If so,

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>1</sup> To have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to well integrity management of underground gas storage facilities.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

Not applicable. (N/A.)

b. For each operator identified, please describe the operator's policies or practices with respect to well integrity management of underground gas storage facilities.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N/A.

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its well integrity management practices related to underground gas storage, including when the audit/investigation occurred and the outcome of the audit/investigation.

N/A.

2. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to groundwater relative to underground gas storage well casings? If so,

---

<sup>1</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."



SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>2</sup> To have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to underground gas storage well casings.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

N/A.

b. For each operator identified, please describe the operator's policies or practices with respect to their understanding of groundwater relative to underground gas storage well casings.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N/A.

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for failure to understand groundwater relative to its underground gas storage well casings, including when the audit/investigation occurred and the outcome of the audit/investigation.

N/A.

3. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to the application of cathodic protection to surface casing? If so,

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>3</sup> To

---

<sup>2</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

<sup>3</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to application of cathodic protection to surface casing.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

N/A.

b. For each operator identified, please describe the operator's policies or practices with respect to the application of cathodic protection to surface casing.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N/A.

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to apply cathodic protection to its underground gas storage well casing(s), including when the audit/investigation occurred and the outcome of the audit/investigation.

N/A.

4. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to well specific well kill plans? If so,

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>4</sup> To have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to specific well kill plans.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly

---

<sup>4</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

N/A.

b. For each operator identified, please describe the operator's policies or practices with respect to well specific well kill plans.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N/A.

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to have in place well specific well kill plans, including when the audit/investigation occurred and the outcome of the audit/investigation.

N/A.

5. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to gas storage well failure investigations? If so,

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>5</sup> To have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to gas storage well failure investigations.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

N/A.

---

<sup>5</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

b. For each operator identified, please describe the operator's policies or practices with respect to gas storage well failure investigations.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N/A.

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to conduct underground gas storage well failure investigations, including when the audit/investigation occurred and the outcome of the audit/investigation.

N/A.

6. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to mechanical integrity testing of gas storage wells? If so,

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>6</sup> To have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to mechanical integrity testing of gas storage wells.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

N/A.

b. For each operator identified, please describe the operator's policies or practices with respect to mechanical integrity testing of gas storage wells.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N/A.

---

<sup>6</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to conduct mechanical integrity testing of its underground gas storage wells, including when the audit/investigation occurred and the outcome of the audit/investigation.

N/A.

7. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to maintenance of records for daily site inspections of underground gas storage wells? If so,

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>7</sup> To have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to maintenance of records for daily site inspections of underground gas storage wells.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

N/A.

b. For each operator identified, please describe the operator's policies or practices with respect to maintenance of records for daily site inspections of underground gas storage wells.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N/A.

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to maintain records for daily site inspections of underground gas storage wells, including when the audit/investigation occurred and the outcome of the audit/investigation.

---

<sup>7</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

N/A.

8. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to transient kill modeling for well control operations of uncontrolled releases of hydrocarbons from gas storage wells.

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>8</sup> To have safely operated its system in compliance with California Public Utilities Code Section 451, prior to or at the time of the LEAK, it was SoCalGas's responsibility, not that of SED, to be aware of policies or practices of other gas storage operators with respect to transient kill modeling for well control operations of uncontrolled releases of hydrocarbons from gas storage wells.

SED further objects to the term "other gas storage operators" overly broad in that it refers to gas storage operators world wide rather than those regulated in California, which is SED's jurisdiction. SED objects to the term "other gas storage operators" as vague. SED also objects to this request as unduly burdensome, asking for SED's to ask all of its staff who might be aware of such policies or practices of this undefined universe of gas storage operators.

Notwithstanding these objections, SED responds as follows. No.

a. Please identify each such operator.

N/A.

b. For each operator identified, please describe the operator's policies or practices with respect to maintenance of records for daily site inspections of underground gas storage wells.

N/A.

c. For each operator identified, please produce all records documenting such policies or practices.

N.A.

d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to conduct transient kill modeling prior to implementing a well control operation by top kill, including when the audit/investigation occurred and the outcome of the audit/investigation.

N.A.

9. Do YOU contend that transient modeling must be performed prior to all well control operations by top kill?

---

<sup>8</sup> For reference, California Public Utilities Code Section 451 provides in part that, "Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public."

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas storage system safely for the public, its employees and patrons.<sup>9</sup> To safely operate its system in compliance with California Public Utilities Code Section 451, SoCalGas is required to determine whether transient modeling or other modeling must be performed prior to each particular well control operation, and prior to each given well kill.

SED also objects to the term “all well control operations by top kill” as overly broad and vague. Notwithstanding these objections, SED answers as follows: No.

a. If so, produce any and all documents, publications, or industry standards that support YOUR position.

N/A.

b. If not, please describe how a well control operator would determine the circumstances under which transient modeling would be necessary or required for a well control operation by top kill?

SED objects to this question as irrelevant. California Public Utilities Code Section 451 requires SoCalGas to operate its natural gas system safely for the public, its employees and patrons. To comply with Section 451, SoCalGas is required to determine the circumstances under which transient modeling is necessary or required for a well control operation by top kill.

---

<sup>9</sup> For reference, California Public Utilities Code Section 451 provides in part that, “Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities. . .as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”