

The following is a brief explanation that gives some guidance as to how to review Ms. Felts' testimony. Several points help with ease of reference.

- Ms. Felts' testimony is organized into nine chapters. Each chapter number responds to the chapter with the same number in SoCalGas' reply testimony. For example, chapter 1 of Ms. Felts' sur-reply testimony responds to chapter 1, Messrs. Hower & Stinson on behalf of SoCalGas.
- With minor exceptions, most of Ms. Felts' roman numeral headings and letter subheadings within each chapter of her sur-reply testimony correspond to the same roman numeral headings and letter subheadings in the corresponding chapter of SoCalGas' reply testimony.
- The document entitled "Sur-Reply Supporting Attachments" with this service includes almost all Exhibits that are referenced in a footnote in testimony. Exhibits not included in this document include documents that have already been provided to the Administrative Law Judges, such as SoCalGas' Reply Testimony, SED's Opening Testimony, or the Blade Energy Partners Root Cause Analysis.
- Two indexes are included with this service. The first index is appended to this document, and is entitled "Sur-Reply Testimony" includes footnotes that reference documents included in the "Sur-Reply Supporting Attachments". To find a document in the Sur-Reply Supporting Attachments, one can look up the footnote and chapter in this index, and find the corresponding Bates number of the beginning of the document in the Sur-Reply Supporting Attachments document. A similar index is included that cross-references the footnotes in opening testimony with the Bates numbers in the Opening Testimony Supporting Attachments.

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Footnote Numbers in Testimony or page number	SED Chapter	Section	Document	Bates-stamp Number
1	1	II	SoCalGas Response to SED Data Request 71, Bates Number, I1906016 SCG SED DR 71 0001146	SED SUR_Reply_000001
2, 7	1	II	The National Association of Corrosion Engineers (NACE) Standard Practice, Application of Cathodic Protection for External Surfaces of Steel Well Casings, NACE SP0186-2007, published in 2007 SED Reply to OSC FN.14.2.NACE-SP0186-NN BATES SED_RT_0029 – SED RT 0056	Document Available in SED Reply Testimony supporting Attachments RT_0029-RT_0056
4	1	II	SED DR 45 Q.7 SoCalGas identifies 17 metallurgists they employ	SED SUR_Reply_000029
5	1	II	Examination Under Oath of Frank Selga, August 1, 2018. p.78 - 80 re recommendations to apply Cathodic protection to well casings, and Examination Under Oath of James Mansdorfer, September 13, 2018, p. 41-43	SED SUR_Reply_000032
6	1	II	SoCalGas DR 3.Q.7.c., Q.9.c, Q.9.b., and Q.10.c.	SED SUR_REPLY_000235
8	1	II	API Recommended Practice 1171 (“API RP 1171”), “Functional Integrity of Natural Gas Storage in Depleted Hydrocarbon 21 Reservoirs and Aquifer Reservoirs” SoCalGas Reply Exhibit I-4	Document Available in SoCalGas Reply Testimony Exhibit I-4
9	1	II	DR 3 Q.7.c: “Identify and produce all DOCUMENTS, aside from the Blade Report, that support SED’s contention that SoCalGas did not employ a “reasonable understanding of the groundwater depths relative to the surface casing shoe and production casing of wellSS-25” prior to the drilling of the two groundwater wells which were drilled for RCA purposes.”	SED SUR_REPLY_000235
14	1	II	Response to SED DR 90 Q.9.b.	SED SUR_Reply_000267
15	1	II	Response to SED DR 90 Q.9.a.	SED SUR_Reply_000267
17	1	II	Blade Response to SED Data Request 69, Question 2, page 17.	SED SUR_Reply_000295
18, 19	1	II	Blade Response to SED Data Request 69, Question 3.a, pages 17-18	SED SUR_Reply_000295
20	1	II	Blade Response to SED Data Request 69, Questions 3b and 3c, pages 18-19	SED SUR_Reply_000295
21	1	II	Blade Response to SED Data Request 69	SED SUR_Reply_000295
24	1	III	SoCalGas Response to SED DR 90 Q10.a	SED SUR_Reply_000267
25	1	III	See SoCalGas Response to SED DR 90 Q10.b. SoCalGas response to DR.90.Q4.c	SED SUR_Reply_000267
28	1	III	SED DR90 Q.11.a	SED SUR_Reply_000267
29	1	III	SoCalGas response to SED DR90 Q.11.a	SED SUR_Reply_000267

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35, 36	1	III	SoCalGas responses to SED DRs 11.Q.3.d, 48.Q.24, 65.Q.2, and 71	SED SUR_Reply_000316; 000394;
37, 38	1	III	Direct Testimony of Phillip E. Baker, Underground Storage, November 2014 (2016 General Rate Case) p.PEB.5	SED SUR_Reply_000429
40	1	III	Blade's response to SED Data Request 69, question 1, pages 5 through 17.	SED SUR_Reply_000295
41	1	III	SoCalGas responses to SED DRs 11.Q.3.d, 48.Q.24, 65, 68, 71, 74, 75, 76 and 77.	SED SUR_Reply_000394
59, 75	1	IV	For instance, ARCO announced a tool in 1988 that would identify external corrosion on casings. (1988.0101.SPWLA-1988-UU-NN). In 2007, there is a report of ultrasonic logging tool that can view corrosion without removing tubing (SPE-108195-MS), in 2007 a paper by ConocoPhillips reports on a method for external corrosion and damage detection on outer and middle concentric strings of casings (2007.1111.SPE-108698-MS); Slumberger currently markets its electronic magnetic casing inspection tool for evaluation of multiple casing strings. (SLB.em-pipe-scanner-br)	SED SUR_REPLY_000561
72	1	IV	AC_CPUC_SED_DR_30_0000778.1973	SED SUR_REPLY_000627
73	1	IV	AC_CPUC_SED_DR_30_0000778.1973 – Well View record “5/24/73 - 6/6/73 Cleaned out to 8748’, pressure tested csg, perforated for conversion to gas storage, ran tbg with gas lift valves.”	SED SUR_REPLY_000627
74	1	IV	AC_CPUC_SED_DR_30_0000778.1973	SED SUR_REPLY_000627
76	1	IV	1959.0519.API-59-199	SED SUR_REPLY_000628
81	1	IV	Brill, Thilo & Demichel, Cindy & Nichols, Edward & Bermudez, Fernando. (2011). Electromagnetic Casing Inspection Tool for Corrosion Evaluation. Society of Petroleum Engineers - International Petroleum Technology Conference 2012, IPTC 2012. 3. 10.2523/14865-MS	SED SUR_REPLY_000650
82	1	IV	Johns, J. E., Cary, D. N., Dethlefs, J. C., Ellis, B. C., McConnell, M. L., & Schwartz, G. L. (2007, January 1). Locating and Repairing Casing Leaks with Tubing in Place - Ultrasonic Logging and Pressure Activated Sealant Methods. Society of Petroleum Engineers. doi:10.2118/108195-MS (SPE -108195-MS)	SED SUR_REPLY_000621
84	1	IV	Examination Under Oath Transcript (Tr.) of Frank Selga, p. 45, line 24 to p. 46, line 21	SED SUR_Reply_000032

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85	1	IV	EUO Tr. of James Mansdorfer, p. 103, line 23 to p. 104, line 14	SED SUR_REPLY_000665
105	1	IV	AC_CPUC_SED_DR_30_0000778.1973 – Well View record “5/24/73 - 6/6/73 Cleaned out to 8748’, pressure tested csg, perforated for conversion to gas storage, ran tbg with gas lift valves.”	SED SUR_REPLY_000627
110	1	IV	NACE Standard Practice SP0186-2007 titled “Application of Cathodic Protection of External Surfaces of Well Casings” was formerly RP0186-2001 SED Reply to OSC FN.14.2.NACE-SP0186-NN BATES SED RT 0029 – SED RT 0056	Document Available in SED Reply Testimony supporting Attachments RT_0029-RT_0056
111	1	IV	1959.0519.API-59-199, presentation by Standard Oil of California	SED SUR_REPLY_000628
112	1	IV	SED Reply to OSC FN.14.2.NACE-SP0186-NN BATES SED RT 0029 – SED RT 0056	Document Available in SED Reply Testimony supporting Attachments RT_0029-RT_0056
113	1	IV	AC_CPUC_0022178.FF34-A.CP	SED SUR_REPLY_001210
114	1	IV	Selga, p.30, lines 13-16 “there is cathodic protection applied to the well casings at Goleta, Honor Rancho, and then some at Aliso Canyon.”	SED SUR_REPLY_000032
117	1	IV	2016.1001.AC_CPUC_0014708.SIMP.10.2016.Status	SED SUR_REPLY_001211
118	1	IV	2016.1001.AC_CPUC_0014708.SIMP.10.2016.Status	SED SUR_REPLY_001211
120	1	IV	2016.0121.I1906016_SCG_SED_DR_67_0000004.SS-25.wall.loss	SED SUR_REPLY_001214
121	1	IV	Examination Under Oath of Frank Selga, August 1, 2018. p.78 - 80 re recommendations to apply Cathodic protection to well casings, and Examination Under Oath of James Mansdorfer, September 13, 2018, pp. 41-43	SED SUR_REPLY_000032
125	1	V	SED Data Request 59, pdf page 2, Question 1a	SED SUR_REPLY_001215
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126	1	V	SoCalGas Response to SED Data Request 59, Question 1a, I1906016_SCG_SED_DR_59_0000001 to 0000002	SED SUR_REPLY_001215
127	1	V	SoCalGas Response to SED Data Request 59, Question 1a, I1906016_SCG_SED_DR_59_0000003	SED SUR_REPLY_001215
129	1	V	Direct Testimony of Phillip E. Baker, Underground Storage, November 2014 (2016 General Rate Case) p.PEB.5	SED SUR_Reply_000429
130	1	V	I1906016_SCG_SED_DR_59_0000058.SIMP	SED SUR_REPLY_001225
131	1	V	Pgs.from.2018.0824.EUO-04_SELGA_0000001-0000923	SED SUR_REPLY_000032
132	1	V	2016.1001.AC_CPUC_0014708.SIMP.10.2016.Status	SED SUR_REPLY_001211

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140	1	VI	SED SCG - DR 89.cross-over.ports	SED SUR_REPLY_001229
142	1	VI	Pages 56-57 EUO-08.DR01.01.JM0400-JM0555	SED SUR_REPLY_001241
146	1	VII	2016.0121.I1906016 SCG SED DR 67_0000004.SS-25.wall.loss	SED SUR_REPLY_001214
147	1	VII	I1906016 SCG SED DR 59_0000060.BH.Vertilog	SED SUR_REPLY_001243
148	1	VII	DR25.01 SCG files_0000001-0001537 p.793.Corrosion	SED SUR_REPLY_001245
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154	1	VII	Pgs.from.2018.0824.EUO-04 SELGA_0000001-0000923	SED SUR_REPLY_000032
157	1	VIII	P.114-115.DR33.01 SCG files_0000001-0163	SED SUR_REPLY_001311
163, 164	1	VIII	AC CPUC SED DR 30_0000776.event.pressures	SED SUR_REPLY_001314
165	1	VIII	Example of chart: AC CPUC SED DR 17_0001784.Surface.Casing.Pressure	SED SUR_REPLY_001315
167	1	VII	2009 Biennial Cost Allocation Proceeding A.08-02-001.SCGC Q 7.1.1.p.10-11	SED SUR_REPLY_001317
169	1	VII	AC CPUC SED DR 17_0001726.pressure.transmitter	SED SUR_REPLY_001330
175	1	IX	SoCalGas Response to SED DR 77	SED SUR_REPLY_000560
178	1	X	Blade Response to SED Data Request 69, Question 1, June 9, 2020, pp. 5-17	SED SUR_Reply_000295
179	1	X	Blade's responses to Hower & Stinson's bullet points can be found in Blade Response to SED Data Request 69, Question 1, pages 8 through 17	SED SUR_Reply_000295
180	1	X	Blade Response to SED Data Request 69, Question 2, June 9, 2020, p. 19	SED SUR_Reply_000295
181, 182	1	X	Blade Response to Data Request-72 Rev 1 06-10-2020.pdf p. 5	SED SUR_Reply_001331
25	2	V	Blade Response to SED Data Request 58, Response 2.7.1, May 15, 2020, pp. 15-16.	SED SUR_Reply_001339
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7	3	I	Boots & Coots Daily Reports	Reply testimony exhibit FN.30.Boots&Coots.DailyReports
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27	6	III	2016.1001.AC_CPUC_0014708.SIMP.10.2016.Status Note: P-42B appears with dates March – May 2016; SS-44A is April-May 2016; and SS-9 is March-June 2016	SED SUR_REPLY_001856
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32	6	III	I1906016 SCG SED DR 59 0000058.SIMP	SED SUR_REPLY_001870
33, 34	6	III	Phil Baker email Dated Dec 20, 2015: AC_CPUC_SED_SELGA_0000648.Staffing.changes.Ded2015	SED SUR_REPLY_001867
35	6	III	2016.1001.AC_CPUC_0014708.SIMP.10.2016.Status	SED SUR_REPLY_001856
36	6	III	2016.1001.AC_CPUC_0014708.SIMP.10.2016.Status	SED SUR_REPLY_001856
40	6	III	I1906016 SCG SED DR 59 0000058.SIMP	SED SUR_REPLY_001870
43	6	III	DR25.01 SCG files_0000001-0001537 p.1506 and DR25.01 SCG files_0000001-0001537 p. 1534	SED SUR_REPLY_001872
45	6	III	EUO Tr. Mansdorfer, p. 124	SED SUR_REPLY_000665
46	6	III	SoCalGas Direct Testimony of Phillip E. Baker Underground Storage, November 2014, p. PEB-8, Table PEB-4, line 13-18	SED SUR_Reply_000429
11	7	IVa	MA-5A well files (image file)	SED SUR_REPLY_002135
12	7	IIa	AC_CPUC_SED Kitson_0002207.SS25.WellHead1950s.p.1679	SED SUR_REPLY_001875
14	7	IIa	Examination Under Oath (EUO.) Transcripts (Tr.), Razavi and Kitson, September 25, 2018, p. 67, line 22 to p. 68, line 28	SED SUR_REPLY_001876
15	7	IIa	Examination Under Oath (EUO.) Transcripts (Tr.), Razavi and Kitson, September 25, 2018, p. 11	SED SUR_REPLY_001876
16	7	IIa	EUO. Tr. Razavi and Kitson, September 25, 2018, p. 73, line 15 to p. 74, line 19	SED SUR_REPLY_001876
17, 18	7	IIa	EUO Tr. Razavi and Kitson, September 25, 2018, p. 57	SED SUR_REPLY_001876
19	7	IIa	EUO Tr. Razavi and Kitson, September 25, 2018, p. 58	SED SUR_REPLY_001876

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Footnote Numbers in Testimony or page number	SED Chapter	Section	Document	Bates-stamp Number
26	7	IIC	SS-25 Well File Records provided by SoCalGas: AC_CPUC_0000001-1587 initial file (1,587 pgs); AC_CPUC_0206158-0208846 (2,688 pgs) AC_CPUC_SED_DR_27_0004206-4430 (224 pgs); AC_CPUC_SED_DR_30_0000476-1176 (700 pgs); AC_CPUC_0001633-0006635 (5,002 pgs); AC_CPUC_0002779-3045 (266 pgs); AC_CPUC_0006636-11937(5,301 pgs) (pp.6636 to 6720 missing); AC CPUC 0011938-12007 (69 pgs)	Document is over 10,000 pages and will be produced by SED if instructed to do so by Administrative Law Judges.
28	7	IId	SoCalGas Supplemental Response to SED Data Request 1, Question 4, March 11, 2019; See also SoCalGas Response to SED Data Request 32, Questions 1, 2 and 3, November 7, 2018; See also SoCalGas Response to SED Data Request 30, Question 13, November 30, 2018	SED SUR_REPLY_002065
29	7	IId	SoCalGas Response to SED Data Request 10, Question 3, November 7, 2016	SED SUR_REPLY_002103
30	7	IId	SoCalGas Response to SED Data Request 17, Question 34, April 27, 2018	SED SUR_REPLY_002105
31	7	IId	SoCalGas Response to SED Data Request 17, Question 35, April 27, 2018	SED SUR_REPLY_002105
32	7	IId	SoCalGas Response to SED Data Request 17, Question 35, April 27, 2018	SED SUR_REPLY_002105
33	7	IId	SoCalGas Response to SED Data Request 17, Question 15, May 11, 2018	SED SUR_REPLY_002112
34	7	IId	SoCalGas Response to SED Data Request 27.01, Question 38, October 5, 2018	SED SUR_REPLY_002114
35	7	IId	SoCalGas Response to SED Data Request 27.01, Question 37, October 5, 2018	SED SUR_REPLY_002114
36	7	IId	SoCalGas Response to SED Data Request 24, Question 4, September 14, 2018	SED SUR_REPLY_002128
40	7	III	AC_CPUC_SED Kitson_0002207.SS25.WellHead1950s.p.1679	SED SUR_REPLY_001875
			Intentionally Left Blank	
49	7	IVc	AC CPUC 0011618.well pressures	SED SUR_REPLY_002136
2	8	III	AC_CPUC_SED_SELGA_0000965	SED SUR_REPLY_002177
5	8	III	Page 9 from AC_CPUC_SED_DR_17_0002635	SED SUR_REPLY_002178

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Footnote Numbers in Testimony or page number	SED Chapter	Section	Document	Bates-stamp Number
6	8	III	2015.1113.Halliburton.Pump.Pressures SS-25	SED SUR_REPLY_002187
8	8	III	Page.32.from AC_CPUC_SED_DR_16_0000649-1026.Incident.Day and Report#20 from Boots&Coots.DailyReports	SED SUR_REPLY_002188
10	8	III	AC_CPUC_SED_DR_17_0002068.shallow.gas.recovery – this memo discusses other issues related to the SS-25 situation, but puts a representative at the well site on 11/13/2015	SED SUR_REPLY_002189
11, 12	8	III	AC CPUC SED DR 17 0002072	SED SUR_REPLY_002191
13	8	III	AC_CPUC_SED_SELGA_0000965	SED SUR_REPLY_002177
14	8	III	AC_CPUC_SED_DR_17_0022682 and AC_CPUC_SED_DR_17_0022683. Note that the email, doc 22682, is a response “Thanks” to Mr. Van de Putt for sending the Timeline	SED SUR_REPLY_002192
17	8	III	DR 33 Q12.f, dated October 23, 2018	SED SUR_REPLY_002196
18	8	III	DR33.01 SCG memo - Q12f amend 7-Dec-18	SED SUR_REPLY_002196
19	8	III	AC_CPUC_SED_SELGA_0000965	SED SUR_REPLY_002177
6	9	I	See Blade Response to SED Data Request 107, Questions 2.1(a.i), 2.2(a.i), and 2.3(a.i).	SED SUR_REPLY_002200
7	9	I	See Blade Response to SED Data Request 107, Questions 2.1(a.ii), 2.2(a.ii), and 2.3(a.ii).	SED SUR_REPLY_002200
8	9	I	See Blade Response to SED Data Request 107, Blade Response 2.1.1 (p. 5), 2.2.1 (p. 6), and 2.3.1 (pp. 6-7)	SED SUR_REPLY_002200
15	9	III	SoCalGas provided SED with privilege logs on March 5, 2018 (See March 5, 2018 email from Greg Healy showing privilege log as attachment and corresponding privilege log), and May 24, 2018 (See May 24, 2018 email from Greg Healy showing privilege log as attachment and corresponding privilege log), and March 15, 2019 (See March 15, 2019 email from Greg Healy showing privilege log as attachment and corresponding privilege log).	SED SUR_REPLY_002207
16	9	III	To view SoCalGas’ most recent updated privilege log, See SoCalGas Response to Data Request 64, Question 2 Supplemental, May 15, 2020	SED SUR_REPLY_002455
17	9	III	SED asked Data Request 64 Question 2 on April 6, 2020	SED SUR_REPLY_002667
18	9	III	See May 24, 2018 updated privilege log in response to SED Data Request 16, Question 10	SED SUR_REPLY_002702

