

Order Instituting Investigation into the November) Investigation 19-11-010 2019 Submission of Southern California Gas) Company's Risk Assessment and Mitigation Phase.

RISK ASSESSMENT MITGATION PHASE

WORKPAPERS TO

CHAPTER SCG-8

STORAGE WELL INTEGRITY

November 27, 2019

SCG-8 Storage Well Integrity Event

Likelihood of "an event": 1 in 12 years. These events range between small to large events. This was estimated by looking at 6 events over the past 70 years.

Consequence if an event were to occur:

Safety:

2.8 safety units every 40 events (every ~500 years). [Based on study by industry professional.]

Financial: all assumption derived from historical data

Once out of 6 events (once in 70 years): \$1B Twice out of 6 events (once in 35 years): \$75M Once out of 6 events (once in 70 years): \$27.5M Twice out of 6 events (once in 35 years): \$3M

Field	City	Company	Date	Impacts	Reported Cause
	,	Southern		Storage well damaged-crushed. Supply of	
	Los	California Gas		gas from Aliso Canyon interrupted for five	Storage well damaged during 1994
Aliso Canyon	Angeles	Company	1/17/1994	days.	Northridge earthquake
		Southern		High-pressure gas could migrate to the	Corrosion of storage well casing. Surface
	Los	California Gas		surface in an matter of hours, according to	annulus of well Porter 50 A had a pressure of
Aliso Canyon	Angeles	Company	2008	SoCalGas testimony.	over 400 PSIG
		Southern			Two wells were found to have leaks in the
	Los	California Gas		No evidence of leaks at the surface or	production casing at depths adjacent to the
Aliso Canyon	Angeles	Company	2013	surface casing	shallower oil production sands.
		Southern			
HONOR	LOS	California Gas			Well inadvertently sidetracked during repair
RANCHO	ANGELES	Company	1992	Storage Well damaged causing shoe leak	of casing shoe leak
					Storage gas migrated via old, poorly
					completed wells and possibly faults.
				Storage gas loss over extended period. In	Injection pressure higher than original
		Southern		1980, found within housing estate above	oilfield pressure, causing facture and
	LOS	California Gas	1950-	field-led to evacuation of families on many	damage to old wells. Injection ceased 1980;
MONTEBELLO	ANGELES	Company	1980	occasions	facility closed 2003.
		Southern			·
	Los	California Gas		Resident Relocation Required, Extensive	
Aliso Canyon	Angeles	Company	2006	and prolonged relief well operations	SS-25 Casing Failure

Incidents for Depleted Field caused by Well Integrity (U.S.A, 1940-2015)

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				Severity	/			
	1	2	3	4	5	6	7	8
Incidents at US	0	53	3	97	2	3	4	1
natural gas	0	33	,	37	2	,	*	_
Average incident	0.000	0.707	0.040	1.293	0.027	0.040	0.053	0.013
per year	0.000	0.707	0.04	1.233	0.027	0.04	0.055	0.013
Active existing		·		328	•		•	,
depleted fields				320				
Average incident	0.0000	0.0022	0.0001	0.0039	0.0001	0.0001	0.0002	0.0000
per year per field	0.0000	0.0022	0.0001	0.0033	0.0001	0.0001	0.0002	0.0000
SCG depleted				4				
fields				-				
SCG incident per	0.0000	0.0086	0.0005	0.0158	0.0003	0.0005	0.0007	0.0002
year (national	0.0000	0.0086	0.0003	0.0136	0.0003	0.0003	0.0007	0.0002

2 Pre-mitigation

SCG-8 Storage Well Integrity Event

Severity

Severity	Category	Description
1	Insignificant/nuisance	operational issues that were easily rectified or repaired, not involving leakage of product fire/explosion/blowout, injury, evacuees, fatalities or leading to financial losses
2	Minor/ disruptive	issues including minor/small leakages/surface release, cavern instabilities that were rectified or repaired, vapour flash, but no real financial loss, fire/explosion/blowout, injury, evacuees or fatalities
3	Moderate (1)	issues including substantial losses through subsurface leakages, but not involving surface release, leading to financial losses, but no fire/explosion/blowout, injury, evacuees or fatalities
4	Moderate (2)	issues including substantial operating problems (including shut-down, closure of caverns &/or loss of roof salt) or substantial losses through subsurface leakages, involving surface release, gas in observation or water wells, or pipeline leakages, leading to financial losses, ± fire/explosion/blowout, but no injury, evacuees or fatalities
5	Significant	issues including significant leakages/losses and surface release, fire/explosion/blowout leading to financial losses, minor numbers of injured/injuries (1–5), but no evacuees, fatalities or serious property damage
6	Serious	issues mainly involving significant surface release, fire/explosion/blowout, greater number of injured/serious injury (5–10), evacuees (<50) and/or serious property damage/financial losses but no fatalities
7	Major	issues mainly involving large-scale surface release through well or surface pipelines, ± fire/explosion/blowout, high numbers of evacuees (50-500), large number of injured/serious injury (10-15) and/or significant property damage/financial losses, but no fatalities
8	Catastrophic	issues mainly involving devastating surface release at facility through well or surface pipelines, fire/explosion/blowout, cratering, fatalities, high number of injured (>15) and/or evacuees (>500) and major property damage/financial losses

	Severity													
	1	2	3	4	5	6	7	8						
Number of Fatality	0	0	0	0	0	0	0	[1,6]						
Number of Serious Injury	()	0	0	0	[1-5]	(5-10]	(10-15]	(15,25]						

Pre-mitigation

Chapter	SCG-8
Risk	Storage Well Integrity Event

Single Point

		Project Life	Cost Forecast (O&M, \$M)		st Forec			tigution.	% risk reduction (use if % risk					sk Redu					RSE		Mitigation
ID	Activity		(, , , ,	, , ,		,	Singl	e Point	addressed not		Safety			Reliabilit	у	F	inancial (\$M)		Singl	le Point
		In Years	2022	2020	2021	2022	LORE	CORE	available) (%)	% address ed	% scope	% of effectivene ss	% address ed	% scope	% of effective ness	% address ed	% scope	% of effectivene ss	Single Point	LORE	CORE
SCG-8-C6	Integrity Demonstration, Verification, and Monitoring Practices	2.00	7.88	35.00	35.00	35.00	0.09	4061.67		11%	121%	95%	0%	0%	0%	11%	121%	95%	0.64	0.10	4061.67
SCG-8-A1	Alternative 1: Casing Wall Thickness Inspection Tools (using only MFL)	2.00	5.25	35.00	35.00	35.00	0.09	4061.67		10%	121%	95%	0%	0%	0%	10%	121%	95%	0.59	0.10	4061.67
SCG-8-A2	Alternative 2: Multi string metal loss inspection + MFL + UT	2.00	8.98	33.00	33.00	33.00	0.09	4061.67		11%	114%	95%	0%	0%	0%	11%	114%	95%	0.62	0.10	4061.67

Low Alternative

	Activity Integrity Demonstration, Verification, and Monitoring Practices Alternative 1: Casing Wall Thickness Inspection Tools (using only MFL)	Project Life	Cost Forecast (O&M, \$M)		st Forec apital, \$			itigation ternative	% risk reduction (use if % risk		Safety			sk Reduc			inancial (S	·n.4)	RSE		Vitigation Iternative
ID	Activity	In Years	2022	2020	2020 2021 2022	2022		CORE	addressed not available) (%)	% address ed		% of effectivene	%		% of	%	Ì	% of	Low Alternat ive		CORE
SCG-8-C6	Integrity Demonstration, Verification, and Monitoring Practices	2	7.88	35.00	35.00	35.00	0.09	3956.67		11.0%	121.0%	95.0%	0.0%	0.0%	0.0%	11.0%	121.0%	95.0%	0.62	0.10	3956.67
SCG-8-A1	Alternative 1: Casing Wall Thickness Inspection Tools (using only MFL)	2	5.25	35.00	35.00	35.00	0.09	3956.67		9.6%	121.4%	95.0%	0.0%	0.0%	0.0%	9.6%	121.4%	95.0%	0.58	0.10	3956.67
SCG-8-A2	Alternative 2: Multi string metal loss inspection + MFL + UT	2	8.98	33.00	33.00	33.00	0.09	3956.67		11.1%	114.5%	95.0%	0.0%	0.0%	0.0%	11.1%	114.5%	95.0%	0.60	0.10	3956.67

High Alternative

High Alterna	tive																				
		Project Life	Cost Forecast		st Forec		Pre-M	itigation	% risk reduction				% Ri	sk Redu	ction				RSE	Post-N	litigation
ID	Activity		(Capital, SM) (Capital, SM) High Alternative High Alternative addressed not available) % Safety Reliability Financial (\$M) available) % % of % % of % % of High Alternative available) % 100 miles (\$M\$)		High A	Iternative															
ייי	Activity									%		% of	%		% of	%		% of	High		
		In Years	2022	2020	2021	21 2022	LORE	CORE	(%)	address	% scope	effectivene	address			address	% scope	effectivene	e Alterna	LORE	CORE
									. ,	ed		SS	ed		ness	ed		SS	ive		
SCG-8-C6	Integrity Demonstration, Verification, and Monitoring Practices	2	7.88	35.00	35.00	35.00	0.09	4236.67		11.0%	121.0%	95.0%	0.0%	0.0%	0.0%	11.0%	121.0%	95.0%	0.66	0.10	4236.67
SCG-8-A1	Alternative 1: Casing Wall Thickness Inspection Tools (using only MFL)	2	5.25	35.00	35.00	35.00	0.09	4236.67		9.6%	121.4%	95.0%	0.0%	0.0%	0.0%	9.6%	121.4%	95.0%	0.62	0.10	4236.67
SCG-8-A2	Alternative 2: Multi string metal loss inspection + MFL + UT	2	8.98	33.00	33.00	33.00	0.09	4236.67		11.1%	114.5%	95.0%	0.0%	0.0%	0.0%	11.1%	114.5%	95.0%	0.65	0.10	4236.67

4 RSE

Attribute	Risk Re	duction		Formula		Basis	;	Reference	Project Life	
Attribute			Total	FOITILUIA	Scope	Effectiveness	Risk Addressed	Reference	r Toject Life	
	% Scope	121%		Wells undergoing assessment on 2 year cycle	SCG designation, some wells might	SME Estimate	SME Estimate based on available literature			
Safety	% Effectiveness	95%	12.64%	High	be reassessed		available iterature			
	% Risk Addressed	11%		Risk associated with casing						
	% Scope	N/A								
Reliability	% Effectiveness	N/A	0.00%						2	
	% Risk Addressed	N/A		Reliability impact is minimal						
	% Scope	121%		Wells undergoing assessment on 2 year cycle						
Financial	% Effectiveness	95%	12.64%	High				3rd party information		
	% Risk Addressed	11%		Risk associated with casing						

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Attribute	Risk Re	duction		Formula		Basis		Reference	Project Life
Attribute			Total	Formula	Scope	Effectiveness	Risk Addressed	Reference	Project Life
	% Scope	121%		Wells undergoing assessment on 2 year cycle	SCG designation, some wells might be	SME Estimate	SME Estimate based on available literature. This benefit		
Safety	% Effectiveness	95%	11%	High	reassessed		is deflated in proportion to		
	% Risk Addressed	10%		Risk associated with casing			surface defects that will not be caught due to the suspension		
	% Scope	0%					of a specific test.		
Reliability	% Effectiveness	0%	0.00%						2
	% Risk Addressed	0%		Reliability impact is minimal					
	% Scope	121%		Wells undergoing assessment on 2 year cycle					
Financial	% Effectiveness	95%	11%	High				3rd party information	
	% Risk Addressed	10%		Risk associated with casing					

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Attribute	Risk Re	duction		Formula		Basi	s	Reference	Project Life
Attribute			Total	Formula	Scope	Effectiveness	Risk Addressed	Reference	riojett Lile
	% Scope	114%		Wells undergoing assessment on 2 year cycle	SCG designation, some wells might		SME Estimate based on available literature. The benefit		
Safety	% Effectiveness	95%	12%	High	be reassessed		marginally increases with the		
	% Risk Addressed	11%		Risk associated with casing			addition of the additional assessment.		
	% Scope	0%							
Reliability	% Effectiveness	0%	0.00%						2
	% Risk Addressed	0%		Reliability impact is minimal					
	% Scope	114%		Wells undergoing assessment on 2 year cycle					
Financial	% Effectiveness	95%	12%	High				3rd party information	
	% Risk Addressed	11%		Risk associated with casing					

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