

SED-261

Neville and Egbert Examination Under Oath, Nov. 9, 2018

I.19-06-016

ALJs: Hecht/Poirier

Date Served: April 30, 2021

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

- - -

PRE-FORMAL INQUIRY INTO)
SOUTHERN CALIFORNIA GAS)
COMPANY'S MANAGEMENT,)
PRACTICES AND PROCEDURES)
RELATED TO THE ALISO CANYON)
INCIDENT IN OCTOBER, 2015)

EXAMINATION UNDER OATH

OF

DAN NEVILLE

and

TOM EGBERT

SAN FRANCISCO, CALIFORNIA

Friday, November 9, 2018

(TRANSCRIPT CONTAINS CONFIDENTIAL PORTIONS)

Pages 1 - 205

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COMPANY'S MANAGEMENT,)
PRACTICES AND PROCEDURES)
RELATED TO THE ALISO CANYON)
INCIDENT IN OCTOBER, 2015,)

Examination Under Oath of Dan Neville and Tom
Egbert taken at 505 Van Ness Avenue, San Francisco,
California commencing at 10:13 a.m., Friday, November
9, 2018, before Candace Yount, CSR No. 2737.

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A P P E A R A N C E S

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Exhibit 7	E-mail chain, top e-mail from Nadia Aftab to Dan Neville, Thomas Egbert, Mike Volkmar, Mike Dozier, Phil E. Baker, Amy Kitson, Charles Jackie & Jovy E. Kroh, dated 12/9/2015 3:28:45 PM (CONFIDENTIAL)	192	1

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1 Friday, November 9, 2018 10:13 a.m.

2 ---000---

3 MR. GRUEN: All right. Let's go on the
4 record.

5 Good morning, Mr. Neville and Mr. Egbert. My
6 name is Darryl Gruen, and I'm representing the Safety
7 and Enforcement Division of the California Public
8 Utilities Commission. And I'm joined by my colleagues
9 and we'll go around the room momentarily. I am a legal
10 counsel with the Safety and Enforcement Division.

11 And if we could go around and everyone say
12 their names. We don't need to spell them today. But
13 just say their names and their titles and who they work
14 for, for the record, please.

15 And why don't we start this way.

16 MR. SHER: Nicholas Sher, also legal
17 counsel for SED.

18 MS. SOLIS: Maria Solis, Senior Utilities
19 Engineer, SED.

20 MS. ROSE: Julietta Rose, Law Clerk with
21 the Legal Division.

22 MR. HOLTER: Randy Holter, Senior
23 Utilities Engineer, CPC.

24 MR. STODDARD: Jack Stoddard, Morgan
25 Lewis, outside counsel to SoCalGas.

1 MS. CLORFEINE: Sabina Clorfeine, counsel
2 for SoCalGas.

3 WITNESS NEVILLE: Dan Neville, Resident
4 Engineering for SoCalGas.

5 WITNESS EGBERT: Tom Egbert, Underground
6 Storage Engineer at Aliso Canyon for SoCalGas.

7 MR. GRUEN: Okay. Safety Enforcement
8 Division is doing an Examination Under Oath today.

9 And as a bit of background, an Examination
10 Under Oath, the term I just mentioned to all of you is
11 just like the deposition where the Safety Enforcement
12 Division, those of us who are in the room today, the
13 counsel and the engineers, will ask questions. And in
14 this case, it's relating to the topic of the incident
15 at well SS -- Standard Sesnon -- 25 at Aliso Canyon
16 beginning October 23rd, 2015, and related issues to
17 Aliso Canyon.

18 So it's like a deposition, the Examination
19 Under Oath, except that there's no underlying
20 proceeding today.

21 I believe . . .

22 THE COURT REPORTER: I need to swear them
23 in.

24 MR. GRUEN: Do you want to do that now?

25 THE COURT REPORTER: Will both of you

1 raise your right hands.

2

3

DAN NEVILLE and TOM EGBERT,

4

having affirmed under penalty

5

of perjury to tell the truth, were

6

examined and testified as follows:

7

8

EXAMINATION

9

BY MR. GRUEN:

10

Q. Okay. So, I was mentioning this is like a

11

deposition except that there's no underlying

12

proceeding. If there was an underlying proceeding,

13

then this for all intents and purposes would be a

14

deposition.

15

We do not know where we are going to go with

16

the information we learn today, whether -- that is to

17

say, whether this will become a full-blown Commission

18

investigation or not. It's possible that it won't as

19

well. This is simply preliminarily -- We're still at

20

our fact-gathering stage.

21

Do you understand? Do you both understand

22

what I've said?

23

WITNESS EGBERT: Yes.

24

WITNESS NEVILLE: Yes.

25

1 BY MR. GRUEN:

2 Q. Okay. When I ask questions, and when others
3 from the Safety Enforcement Division ask you questions
4 today, it is important that you provide truthful and
5 complete answers to them. Please answer questions
6 directly.

7 We may ask certain questions very broadly at
8 some point, which will give you a chance to add to your
9 answers or answer as broadly as we ask, but please keep
10 your answers directly responsive to the questions that
11 we ask.

12 Do you understand that?

13 WITNESS EGBERT: Yes.

14 WITNESS NEVILLE: Yes.

15 BY MR. GRUEN:

16 Q. Okay. And if you don't understand a question,
17 either because we've phrased it poorly, not articulated
18 it well, please do not guess or speculate as to the
19 answer. Please ask us to repeat it or just say that
20 you do not understand the question.

21 You can also ask to rephrase it, if necessary.
22 We prefer to try and get the wording right the first
23 time, but if need be, we can rephrase.

24 Do you understand that?

25 WITNESS EGBERT: Yes.

1 WITNESS NEVILLE: Yes.

2 BY MR. GRUEN:

3 Q. Okay. Will you agree to keep the contents of
4 the Examination Under Oath confidential, what we
5 discuss today?

6 WITNESS EGBERT: Yes.

7 WITNESS NEVILLE: Yes.

8 BY MR. GRUEN:

9 Q. Okay. Thank you.

10 For the benefit of everyone here and the
11 transcript as well, if you would wait until we finish
12 asking our questions before giving an answer and we'd
13 ask if it will -- In some cases, we'll direct questions
14 to one of you. In some cases, if -- if we don't
15 specify that a question is directed at a particular one
16 of you, then it's really intended to be for either or
17 both of you to answer. And you're welcome to do so.

18 And what we would ask in that case is just
19 please take turns, wait until the question is finished,
20 then answer. Once the question is finished, answer one
21 at a time.

22 If you -- If we inadvertently should begin
23 another question before you finish your answer, just
24 let us know. That's not the intent. We want to be
25 sure you have a full chance to complete your answers.

1 And one at a time approaches for the benefit especially
2 of the transcript so that the court reporter can take
3 accurate transcribing of -- of what is said.

4 Do you understand that?

5 WITNESS EGBERT: Yes.

6 WITNESS NEVILLE: Yes.

7 BY MR. GRUEN:

8 Q. Thank you.

9 Okay. I have here, and we have circulated
10 to -- to -- I believe to you and to Southern California
11 Gas Company counsel, subpoenas. There are two separate
12 subpoenas. One is for each of you and that is for you
13 to appear and answer questions today.

14 And so do you see a copy of a subpoena in
15 front of you for your appearance?

16 WITNESS EGBERT: Yes.

17 WITNESS NEVILLE: Yes.

18 MR. GRUEN: Okay. And counsel for
19 SoCalGas, I might ask, does this appear to be an
20 accurate copy of the subpoena for Mr -- Messrs. Egbert
21 and Neville that we -- that Safety Enforcement Division
22 sent to Southern California Gas Company?

23 MS. CLORFEINE: Yes, it does appear to be
24 an accurate copy of the subpoenas for Mr. Egbert and
25 Mr. Neville.

1 MR. GRUEN: Thank you.

2 So with that, I'd ask that the exhibit -- the
3 subpoena for Mr. Dan Neville be marked as Exhibit 1 and
4 the subpoena for Mr. Thomas Egbert be marked as
5 Exhibit 2.

6 (The documents referred to were marked
7 as Exhibit Nos. 1 & 2 by the
8 Reporter.)

9 BY MR. GRUEN:

10 Q. And this -- A word about the subpoena. It
11 means -- The subpoenas for you to appear means that you
12 are required to answer our -- the Safety Enforcement
13 Division questions today and do so under oath. You're
14 not answering questions voluntarily.

15 And so just a word: I'm going to read an
16 excerpt from the Commission's General Order 112-F about
17 retaliation and note -- It says, Section 302.1:

18 (Reading):

19 "In addition to other statutes which
20 provide remedies for retaliation against
21 Whistleblowers, or any other remedy an
22 employee may have in a court, the Commission
23 prohibits California natural gas utilities
24 from retaliating against any employee, who
25 reports, in good faith, unsafe conditions to

1 the Commission. For purposes of this
2 regulation, the Commission retains the option
3 to impose penalties and any other remedies
4 provided under the Public -- the California
5 Public Utilities Code for any natural gas
6 utility, which the Commission finds violates
7 this regulation."

8 So, with that, I'll ask you -- each of you:
9 Has anyone suggested, stated or implied to you
10 that you may or will be retaliated against for talking
11 with the Safety and Enforcement Division today?

12 WITNESS EGBERT: No.

13 WITNESS NEVILLE: No.

14 BY MR. GRUEN:

15 Q. For telling us -- For telling the Safety and
16 Enforcement Division certain things today?

17 WITNESS EGBERT: No.

18 WITNESS NEVILLE: No.

19 BY MR. GRUEN:

20 Q. Okay. Thank you.

21 Have you spoken with anyone today about this
22 Examination Under Oath?

23 Let me rephrase that: Have you spoken with
24 anyone about this Examination Under Oath that we're
25 having today?

1 WITNESS NEVILLE: Only tell my Supervisor
2 that I was going to be here and maybe another person in
3 the office, but that's about it.

4 BY MR. GRUEN:

5 Q. Okay. Mr. Egbert.

6 WITNESS EGBERT: Just immediate
7 Supervisor and counsel.

8 BY MR. GRUEN:

9 Q. Okay. And did -- Were you told anything in
10 preparation for today?

11 MR. STODDARD: Objection: Privileged as
12 to discussions with counsel.

13 MR. GRUEN: Okay.

14 BY MR. GRUEN:

15 Q. Were you told anything from anyone who was not
16 an attorney --

17 WITNESS EGBERT: No.

18 BY MR. GRUEN:

19 Q. -- in preparation for today.

20 WITNESS NEVILLE: No.

21 BY MR. GRUEN:

22 Q. Okay.

23 MS. CLORFEINE: Mr. Egbert, just a
24 reminder to let him finish his question. Thank you.

25

1 BY MR. GRUEN:

2 Q. Okay. All right. What we're -- we're going
3 to try to do -- Let me just say, we're not trying to
4 trick you here today. That's not our goal.

5 Really what we're trying to do is understand
6 the -- what happened at Aliso and what happened at
7 SS-25 beginning -- perhaps leading up to but certainly
8 beginning October 23rd and following that time and your
9 roles in particular, as well as some of your
10 understanding -- your background and understanding that
11 may qualify you for -- for what -- what you did in
12 Aliso.

13 So, what we're going to do is -- is, as best
14 we can, articulate really what we're trying to get at
15 with a given set of questions before we ask them just
16 so that you see where we're trying to go, what we're
17 trying to get in asking the questions.

18 So, with that, really, this first set of
19 questions is to better understand each of your
20 qualifications for -- as -- in the roles that you have
21 now and your qualifications specifically, whether you
22 call yourself experts, and what your qualifications are
23 as -- to have the expertise that you do.

24 So --

25 MR. STODDARD: Darryl, I'm sorry. Before

1 you begin that --

2 MR. GRUEN: Sure.

3 MR. STODDARD: -- we were still doing
4 kind of admonitions.

5 MR. GRUEN: Yeah.

6 MR. STODDARD: I thought you were going
7 to be taking a break.

8 But I forgot -- My fault because I didn't
9 remind you beforehand. But can I reread the admonition
10 from yesterday --

11 MR. GRUEN: Absolutely.

12 MR. STODDARD: -- regarding counsel?

13 MR. GRUEN: Absolutely. Thank you for
14 the reminder. Certainly.

15 MR. STODDARD: Thank you.

16 For purposes of the record, counsel for So Cal
17 is present for today's Examination Under Oath. But as
18 with all prior EUOs related to this matter has been
19 instructed by counsel for SED to limit its objections.

20 While counsel will still object where
21 necessary, in light of SED's instructions, counsel's
22 failure to object does not constitute a waiver as to
23 any specific question, and we reserve the right to
24 object if and when the transcript is introduced in any
25 subsequent proceeding or litigation.

1 MR. GRUEN: Understood.

2 MR. STODDARD: Thank you.

3 BY MR. GRUEN:

4 Q. Okay. So, with that, regarding your -- each
5 of your qualifications.

6 Mr. Egbert, why don't we start with you. And
7 if we could walk through -- and Mr. Neville, just
8 flagging, we're going to ask essentially the same set
9 of questions for you as we go through when we're --
10 when Mr. Egbert is through.

11 Could you explain -- Would you consider
12 yourself a natural gas storage well expert?

13 (Pause in proceedings.)

14 WITNESS EGBERT: I would say I have some
15 expertise on underground storage operations and . . .
16 underground storage wells.

17 BY MR. GRUEN:

18 Q. Okay. Thank you.

19 Could you elaborate at a high level what
20 expertise you have.

21 WITNESS EGBERT: In relation to gas
22 storage wells only?

23 BY MR. GRUEN:

24 Q. Yes, please.

25 WITNESS EGBERT: So, in the context of

1 natural gas storage, my expertise is limited to the
2 experience I've acquired over the last four and a half
3 years at Aliso Canyon.

4 And . . . my expertise -- part of my expertise
5 is in deliverability, injection and withdrawal
6 deliverability, surface processes that are required.

7 I have some expertise from my prior careers in
8 water treatment and chemical treatment, which is part
9 of the storage operations.

10 And I would say I have some expertise in the
11 operation of gas storage wells.

12 BY MR. GRUEN:

13 Q. Okay. Thank you.

14 Can you please explain all of the specific
15 positions that you have held at Aliso Canyon and the
16 approximate length of each position that you've held.

17 WITNESS EGBERT: I've had only one
18 position at -- at Aliso Canyon, and the title of that
19 position is Senior Storage Engineer.

20 BY MR. GRUEN:

21 Q. Yes. And -- And the approximate dates that
22 you held that position?

23 WITNESS EGBERT: I took the position
24 in -- I believe it was March of 2014, and it's my
25 current position now as well. My title hasn't changed

1 since, so that timeframe.

2 BY MR. GRUEN:

3 Q. Thank you.

4 Okay. Did you work on anything related to
5 underground natural gas storage for Southern California
6 Gas Company prior to March of 2014 when you took the
7 position of Senior Storage Engineer?

8 WITNESS EGBERT: No.

9 BY MR. GRUEN:

10 Q. Thank you.

11 (Pause in proceedings.)

12 THE WITNESS: Could you rephrase that
13 question?

14 BY MR. GRUEN:

15 Q. Sure.

16 I'm trying to get at your -- any experience
17 that you have related to underground natural gas
18 storage prior to March of 2014.

19 WITNESS EGBERT: So, I did have some
20 experience in surface processes within -- within
21 storage.

22 BY MR. GRUEN:

23 Q. Okay.

24 WITNESS EGBERT: So storage includes more
25 than just the wells themselves. There are surface

1 processes.

2 And during my time working in the transmission
3 group, I was involved in some projects and some work in
4 the surface facilities associated with underground
5 storage.

6 BY MR. GRUEN:

7 Q. And what title did you hold when you worked on
8 the surface processes for the transmission group?

9 WITNESS EGBERT: My title may have
10 changed numerous times during that period of time.

11 I was working in the Transmission Pipeline
12 Integrity Group at the time, and my involvement --
13 my -- my title at that time would in -- my titles would
14 include Assessment Manager and Project Manager.

15 BY MR. GRUEN:

16 Q. And the approximate dates that you worked on
17 surface processes for the Transmission Group?

18 WITNESS EGBERT: They ranged from years
19 2005 to 2013.

20 BY MR. GRUEN:

21 Q. Okay. And then what did you do between 2013
22 and March of 2014?

23 WITNESS EGBERT: At that point in time, I
24 was working in the Gas Engineering Pipeline Integrity
25 Group.

1 BY MR. GRUEN:

2 Q. Okay. And what were you doing for the Gas
3 Engineering Pipeline Integrity Group?

4 WITNESS EGBERT: I was a Transmission
5 Pipeline Assessment Manager.

6 BY MR. GRUEN:

7 Q. And what was your role?

8 WITNESS EGBERT: My role: I was involved
9 in transmission pipeline assessment projects.

10 BY MR. GRUEN:

11 Q. Okay.

12 WITNESS EGBERT: I should say pipeline
13 integrity assessments.

14 BY MR. GRUEN:

15 Q. Did you work on -- Just a clarification about
16 pipeline integrity.

17 When I hear that word, I think of things like
18 transmission integrity management or distribution
19 integrity management.

20 WITNESS EGBERT: (Nodding head.)

21 BY MR. GRUEN:

22 Q. Were those the kinds of things you were
23 working on?

24 WITNESS EGBERT: Transmission pipeline
25 integrity --

1 BY MR. GRUEN:

2 Q. Okay.

3 WITNESS EGBERT: -- projects.

4 BY MR. GRUEN:

5 Q. Okay. Understood. Not storage integrity or
6 well integrity management types of projects?

7 WITNESS EGBERT: No.

8 BY MR. GRUEN:

9 Q. Understood.

10 Okay. Can you, again at a high level,
11 elaborate on, when you mentioned the surface processes
12 for the Transmission Group what your role was in -- in
13 doing that work.

14 WITNESS EGBERT: It was focused on
15 internal corrosion assessment of transmission pipelines
16 within gas storage fields.

17 BY MR. GRUEN:

18 Q. Okay. And internal corrosion assessment, was
19 that for things at the surface or was that down -- down
20 well as -- as well?

21 WITNESS EGBERT: Surface only.

22 BY MR. GRUEN:

23 Q. Understood. Thank you.

24 Did that include work at Aliso Canyon?

25 WITNESS EGBERT: Yes.

1 BY MR. GRUEN:

2 Q. Okay. Understood.

3 I'm getting at this in a roundabout way, but
4 regarding your role as a Senior Storage Engineer for
5 deliverability and injection withdrawal, can you
6 describe at a high level that role.

7 WITNESS EGBERT: Yes.

8 When gas injection or gas withdrawal is
9 requested by Gas Control at Southern California Gas, at
10 Aliso Canyon, Op -- the Operations Group rely on the
11 Underground Storage Engineers to provide guidance on
12 how to operate the wells, on either withdrawal mode or
13 injection mode, which wells to operate, in what
14 priority they should be operated, and any other issues
15 the wells may have that impact our ability to either
16 inject gas or withdraw gas into the transmission
17 system.

18 BY MR. GRUEN:

19 Q. Okay.

20 WITNESS EGBERT: And a large part of my
21 responsibility is to provide that guidance to
22 operations.

23 MR. GRUEN: Thank you.

24 Let's go off the record for just a moment.

25

1 (Whereupon, a discussion was held off
2 the record commencing at 10:35 a.m.)

3 (Proceedings resumed at 10:36 a.m.):)

4 MR. GRUEN: Okay. Back on the record.

5 BY MR. GRUEN:

6 Q. So, in providing guidance to Operations, is
7 your role in deliverability focusing on Operations
8 strictly, then, and providing guidance for purposes of
9 enabling Operations to do their job?

10 WITNESS EGBERT: Yes, I would say that's
11 a correct statement.

12 BY MR. GRUEN:

13 Q. Okay. Great. Okay. Thank you.

14 Is there anything that we missed that would --
15 that -- that I've missed in asking you that would help
16 us understand your qualifications to speak about
17 underground natural gas storage at Aliso Canyon?

18 WITNESS EGBERT: Can you rephrase that --

19 BY MR. GRUEN:

20 Q. Sure.

21 WITNESS EGBERT: -- just to make sure I
22 understand.

23 BY MR. GRUEN:

24 Q. It's a somewhat large question in that it's
25 asking for anything else that you haven't talked about

1 yet that would qualify you to speak about underground
2 natural gas storage at Aliso.

3 WITNESS EGBERT: Well, I would just say
4 that my experience there exposed me to many facets of
5 underground storage that . . . that qualify me to talk
6 about various things in my -- that I have experience
7 with.

8 BY MR. GRUEN:

9 Q. Okay. How long have you been -- How long
10 would you say you've been doing work? I know you
11 mentioned you had worked as -- for deliverability since
12 March of 2014.

13 WITNESS EGBERT: Yes.

14 BY MR. GRUEN:

15 Q. But how long have you been -- would you say
16 you've worked on matters related to underground natural
17 gas storage?

18 WITNESS EGBERT: Well, as I stated in a
19 previous question, underground gas storage involves not
20 only down-hole operations but surface operations.

21 So, when I was working in the transmission
22 group from 2014 -- 2005 to 2014 roughly, I was involved
23 in some -- some of the process -- processes --

24 BY MR. GRUEN:

25 Q. Understood.

1 WITNESS EGBERT: -- on the surface.

2 BY MR. GRUEN:

3 Q. Okay.

4 WITNESS EGBERT: I don't know if that
5 answered your question.

6 BY MR. GRUEN:

7 Q. It does. That's helpful.

8 I think -- I think -- What I'm hearing is, I
9 think we're getting the extent of your experience,
10 including both surface and underground working for
11 deliverability that really qualifies you to speak about
12 underground natural gas storage. So I think you have.

13 WITNESS EGBERT: (Nodding head.)

14 BY MR. GRUEN:

15 Q. And I'm seeing you nod. I think that's a yes.

16 WITNESS EGBERT: Yes.

17 BY MR. GRUEN:

18 Q. Okay.

19 WITNESS EGBERT: I wanted you to finish
20 your question before I verbalized.

21 BY MR. GRUEN:

22 Q. Absolutely thank you. And thank you for the
23 signal telling me I was on the right track.

24 WITNESS EGBERT: (Nodding head.)

25

1 BY MR. GRUEN:

2 Q. All right. With that, Mr. Neville, if we
3 could turn to you.

4 And you see, I hope, the -- the thread of
5 questions there. So it's intended to get at your
6 experience related to underground natural gas storage.
7 If it includes surface-related subject areas, please
8 include that.

9 WITNESS NEVILLE: (Nodding head.)

10 MR. GRUEN: If you want to talk about
11 your -- the times that you did -- had certain positions
12 related to that topic area, that would be helpful, the
13 positions you held, and then your roles, your role in
14 each position.

15 WITNESS NEVILLE: (Nodding head.)

16 Okay. So I'll start with the -- the position
17 I had when I started at Aliso Canyon, which was a
18 Senior Storage Field Engineer position. That was --
19 The start was in 2007. I worked in that position to
20 approximately sometime in 2013.

21 Then I moved to a Reservoir Engineering
22 Manager position from 2013 to -- till today. However,
23 as that title of Reservoir Engineering Manager, there
24 was several different job roles.

25 The initial role in 2013 to 2014 was Reservoir

1 Engineering Manager, where I had the four Storage Field
2 Engineers from the four storage fields that the company
3 operates. They reported to me.

4 I had the Storage Field Engineer for
5 Montebello report to me, and I had a person in -- in
6 the Land & Right of Way, for -- dealing with storage
7 issues, report to me.

8 So, in 2014, I then moved to a department
9 called Storage Asset Management as the same title,
10 Storage Engineering Manager. That position was in
11 Chatsworth. I worked on projects in -- involving the
12 company's Native Oil & Gas project.

13 And in 20 -- let's see -- early 2016, I then
14 moved back to Aliso as the Reservoir Engineering
15 Manager over the four Storage Field Engineers in
16 Montebello.

17 And then in -- Later in 2016, I then moved to
18 Risk Management as -- with the same title, Reservoir
19 Engineering Manager, and that's where I am today.

20 BY MR. GRUEN:

21 Q. Thanks.

22 I -- I think I'm gleaning that your title in
23 Storage Asset Management as Storage Engineering Manager
24 you began in 2014. You continued that until early 2016
25 when you began -- when you moved back to Aliso as the

1 Reservoir Engineering Manager?

2 WITNESS NEVILLE: Right. It was the
3 Reservoir Engineering Manager title through each one of
4 my jobs. It wasn't Storage Engineering Manager. It's
5 a -- That was a different job function. So it was
6 Reservoir Engineering Manager.

7 BY MR. GRUEN:

8 Q. Okay. And as -- as Reservoir Engineering
9 Manager -- I see the thread that you're drawing there.

10 So, starting in 2013 to 2014 when the four
11 Storage Field Engineers reported to you, what subject
12 areas were you focusing on with your reports?

13 WITNESS NEVILLE: The same subject areas
14 that I dealt with as the Storage Field Engineer at
15 Aliso, in that those issues were deliverability,
16 injection issues, monitoring, Temperature Surveys that
17 were run in the fields. Just the -- the issues that
18 the engineers would deal with in the individual fields,
19 I would kind of assist them as the Manager and
20 Supervisor to help them with their roles.

21 BY MR. GRUEN:

22 Q. Okay. And what qualified you at that point to
23 be their Manager and assist them with their roles?

24 WITNESS NEVILLE: Well, my experience
25 prior to taking that position, I would presume would

1 have qualified me.

2 Do you want me to cover -- go into that?

3 BY MR. GRUEN:

4 Q. Yeah, if --

5 WITNESS NEVILLE: Okay.

6 BY MR. GRUEN:

7 Q. -- you could elaborate.

8 It sounds like it's -- it has to do with your
9 background in natural gas underground storage. If --
10 And so if I'm following that correctly, yes, please, if
11 you could elaborate.

12 WITNESS NEVILLE: Yes. I had -- Prior to
13 2007, I did have various roles in storage in --
14 storage. I started in 1991 in underground storage as a
15 Staff Engineer.

16 I then moved into drilling the workover for a
17 couple years.

18 Then I moved to the storage engineering --
19 Storage Engineer at Honor Rancho in Goleta. So I had
20 two fields there for about five years.

21 And then I moved to the Storage Operations
22 Manager at Goleta.

23 And these were roles before taking the Storage
24 Field Engineer position at -- back at Aliso.

25

1 BY MR. GRUEN:

2 Q. Understood.

3 And I skipped right over it. But if you could
4 talk about the -- your role -- I think you had
5 mentioned a Senior Storage Field Engineer position from
6 2007 to 2013.

7 Was -- Was that at Aliso specifically?

8 WITNESS NEVILLE: Yes.

9 BY MR. GRUEN:

10 Q. Okay. And can you talk about your role there?

11 WITNESS NEVILLE: Yes. It's the same
12 role that Tom talked about. It's the -- the -- the
13 engineering position dealing with the -- the
14 underground storage component of the field. So we
15 would as the engineer provide guidance in terms of
16 issuing withdrawal schedules, which was a listing of
17 the wells, the expected flow rates, the choke sizes,
18 the . . . the flow type.

19 We would issue those withdrawal schedules to
20 Operations. We would specify when we needed choke
21 changes to maintain deliverability of the field. And
22 this would occur throughout the year for -- as the
23 inventory and the pressure changed in the field, we
24 would have to constantly update the -- the withdrawal
25 schedule and the -- and the injection schedule to make

1 sure we had the Wells optimized and properly choked.

2 So that was one component with the withdrawal
3 and the injection.

4 The -- The other component was in -- in
5 monitoring, looking at the Temperature Surveys that
6 were run annually in the field, looking at the weekly
7 pressures that the field people were collecting, and
8 dealing with any other operational issues that
9 Operations or Maintenance might raise to us with regard
10 to the wells.

11 So that's -- I think that's -- That would --
12 That would kind of cover the general overview of what
13 we did as a Storage Engineer.

14 BY MR. GRUEN:

15 Q. Thank you.

16 Regarding Temperature Surveys and pressures
17 that people -- that the field people were collecting,
18 what was the purpose of looking at those things?

19 WITNESS NEVILLE: So, we'll start with
20 the Temperature Surveys.

21 BY MR. GRUEN:

22 Q. Please.

23 WITNESS NEVILLE: The Temperature Surveys
24 are defined in -- as mechanical integrity tests in the
25 DOGGR regulations. They're required annually.

1 The -- The time of the year that we typically
2 ran these surveys were prior to withdrawal season. And
3 we would then run the surveys and -- and then the
4 Engineer would take a look at the -- the plot and look
5 for anomalous readings and -- which may warrant further
6 investigation.

7 But it was -- it was a way of monitoring the
8 mechanical integrity of the well.

9 BY MR. GRUEN:

10 Q. And when you say that you ran surveys prior to
11 withdrawal season, so is that to suggest that a
12 Temperature Survey was run at each underground natural
13 gas storage well each year prior to withdrawal season?

14 WITNESS NEVILLE: Yes. That's the --
15 That was the -- That was protocol. Prior -- It was --

16 The regulations don't say when they're --
17 they're required, but we chose to run them prior to
18 withdrawal season when the pressure in the field was at
19 its highest. So that would give us the chance to -- to
20 do a mechanical integrity -- integrity test in the well
21 when pressures were typically the highest.

22 So it meant we did more surveys in a shorter
23 period of time instead of spacing them out throughout
24 the year.

25

1 BY MR. GRUEN:

2 Q. I -- I see. Meaning, the shorter period of
3 time would be right before it was time to start
4 withdrawing from the well?

5 WITNESS NEVILLE: Correct.

6 BY MR. GRUEN:

7 Q. I follow. Thank you.

8 And how . . . Did you keep records for the --
9 Did SoCalGas -- Does SoCalGas keep records for all of
10 the Temperature Surveys for each well?

11 WITNESS NEVILLE: Yes, the company does
12 keep records for -- of the Temp Surveys.

13 BY MR. GRUEN:

14 Q. Yeah. Okay.

15 And what were the surveys -- What were the
16 Temperature Surveys . . .

17 I mean, I -- I'm gleaning that, from a lay
18 person's perspective, that the Temperature Surveys
19 would tell you if the well was fit in order to
20 withdraw.

21 Is that an accurate way to characterize it?

22 WITNESS NEVILLE: Well, maybe the --
23 Maybe the best way to characterize it would be -- or
24 another way to characterize --

25

1 BY MR. GRUEN:

2 Q. Please.

3 WITNESS NEVILLE: -- it would be to
4 understand that the temperature gradient in a well
5 increases from -- from surface temperatures,
6 approximately surface temperatures, to the bottom hole
7 temperature. And so the -- the trend is -- is -- is a
8 constant -- near-constant gradient.

9 So the idea of the Temperature Survey is to
10 detect a -- a cooling anomaly which could be a result
11 of -- of gas movement.

12 BY MR. GRUEN:

13 Q. Okay.

14 WITNESS NEVILLE: And I might add that
15 the Temperature Surveys are done with the well in a
16 static condition. So the well was shut in
17 approximately two days before the survey's done to
18 allow the -- any effects from withdrawal or injection
19 to dissipate.

20 BY MR. GRUEN:

21 Q. Thank you.

22 If . . . If . . . If -- If there was a leak
23 in a well, would the temperature testing tell you?
24 The -- I'm sorry. Would the Temperature Surveys tell
25 you?

1 WITNESS NEVILLE: If the leak is -- is --
2 causes a cooling, which the expectation is that gas
3 movement through a -- through a small area causes a
4 temperature drop, and the Temperature Log would
5 presumably pick that up.

6 BY MR. GRUEN:

7 Q. Okay. And with regards to pressure testing,
8 could you at a high level describe the purpose of the
9 pressure testing.

10 WITNESS NEVILLE: So, by pressure
11 testing, you might be referring to the weekly pressure
12 recording that -- that was done in -- in addition to
13 the Temperature Surveys.

14 BY MR. GRUEN:

15 Q. Yes. Thank you.

16 WITNESS NEVILLE: So the -- the weekly
17 pressure recording was done also as -- as a form of
18 monitoring. And so the -- the idea was to collect a
19 pressure from the tubing, from the casing, and from
20 each annulus of the well.

21 And a com -- A comparison is made from week to
22 week with regard to the pressures that were recorded
23 and measured in the annuluses. So those were kind of
24 the key areas to -- to look for. Surface casing
25 annulus.

1 BY MR. GRUEN:

2 Q. Okay. Thank you. That's very helpful,
3 Mr. Neville.

4 And, similarly, if -- if there was a leak in
5 the well, would the weekly pressure recording that
6 was -- would that provide an indication of leaks in the
7 well?

8 WITNESS NEVILLE: The expectation is that
9 the -- That recording would, with the caveat that it
10 typically would pick up a leak in the shallower part of
11 the wellbore and perhaps not deeper in the wellbore.

12 BY MR. GRUEN:

13 Q. Can -- Can you give some idea of -- of -- of
14 depths. When you mention shallower versus deeper in
15 terms of picking up the leaks, how deep would the
16 expectation be that pressure recording would pick up a
17 leak in a given well?

18 WITNESS NEVILLE: I think that one can
19 expect to pick up a leak at -- at least at the depth of
20 the surface casing because the production casing is
21 inside the surface casing.

22 So the -- If there were a leak path outside
23 the production casing within the outer surface casing,
24 one would expect that to be contained within the
25 surface casing and it would show up as pressure at the

1 surface and -- and be picked up by the weekly
2 pressure . . .

3 BY MR. GRUEN:

4 Q. And thank you for the clarification. That's
5 helpful.

6 In terms of the -- the outer surface casing,
7 is there an expectation about how far down pressure
8 recording -- a weekly pressure recording could detect a
9 leak?

10 WITNESS NEVILLE: How far down?

11 BY MR. GRUEN:

12 Q. At what depth from the surface?

13 In other words, could a pressure recording,
14 for example, detect a leak on outer surface casing
15 500 feet from the surface on a given well?

16 WITNESS NEVILLE: So let me . . . Let me
17 start.

18 Okay. So the -- the leak that we would be
19 looking to detect would be a leak from -- from the
20 production casing --

21 BY MR. GRUEN:

22 Q. Yes.

23 WITNESS NEVILLE: -- not the surface
24 casing because the surface casing doesn't hold any of
25 the reservoir pressure.

1 It's the production casing --

2 BY MR. GRUEN:

3 Q. Thank you --

4 WITNESS NEVILLE: -- that we're
5 interested in.

6 BY MR. GRUEN:

7 Q. -- for the clarification. I follow. Yes.
8 Okay.

9 WITNESS NEVILLE: And so the pressure
10 is -- is a pressure that's recorded at the surface.

11 BY MR. GRUEN:

12 Q. Okay.

13 WITNESS NEVILLE: So there's no depth
14 measurement with that read.

15 BY MR. GRUEN:

16 Q. Okay.

17 WITNESS NEVILLE: One would need to -- to
18 follow up with a Temperature Survey to find the depth.

19 BY MR. GRUEN:

20 Q. All right. I see.

21 So is it that the pressure read at the surface
22 is telling whether there's a leak in the well?

23 WITNESS NEVILLE: The pressure read could
24 be an indication, yes, that there would be a -- could
25 be a leak in the well.

1 BY MR. GRUEN:

2 Q. That there could be a leak.

3 WITNESS NEVILLE: Yeah.

4 Q. It's an indication. I follow.

5 Okay. Thank you.

6 MS. ROSE: Can I ask?

7 MR. GRUEN: Absolutely.

8

9 EXAMINATION

10 BY MS. ROSE:

11 Q. So if there was a leak a thousand feet down in
12 the production casing, would you expect that to be
13 reflected?

14 WITNESS NEVILLE: You'd have to look at
15 each particular well and its construction.

16 BY MS. ROSE:

17 Q. Okay.

18 WITNESS NEVILLE: But typically, the --
19 the -- Typically, a leak within -- shallower than the
20 surface casing --

21 BY MS. ROSE:

22 Q. Um-hmm.

23 WITNESS NEVILLE: -- would be expected to
24 show up as pressure.

25

1 BY MS. ROSE:

2 Q. Um-hmm.

3

4 EXAMINATION (RESUMED)

5 BY MR. GRUEN:

6 Q. And then temperature could be used in order to
7 tell you approximately how far down.

8 It -- It could be -- It could give an
9 indication as to approximately how far down a well the
10 leak was?

11 WITNESS NEVILLE: That's correct. The
12 Temperature Survey, since it's a function of
13 temperature versus depth --

14 BY MR. GRUEN:

15 Q. Yeah.

16 WITNESS NEVILLE: -- you're -- you can
17 correlate a depth to the temperature level.

18 MR. GRUEN: Okay. Thank you.

19 Thank you both. Appreciate that.

20 It's been about an hour. Do you want to go
21 off the record --

22 MS. CLORFEINE: That would be great.

23 MR. GRUEN: -- take a break?

24 Okay. Why don't we take a break for about 10
25 minutes.

1 Let's go off the record.

2 (Recess taken at 10:59 a.m.)

3 (Proceedings resumed at 11:10 a.m.):)

4 MR. GRUEN: Let's go back on the record.

5 BY MR. GRUEN:

6 Q. Mr. Neville, just to follow up. We were
7 talking just before the break about Temperature Surveys
8 and -- and pressure recordings.

9 Do you recall that?

10 WITNESS NEVILLE: Yes.

11 BY MR. GRUEN:

12 Q. Okay. I want to ask a little bit more about
13 Temperature Surveys, if I could.

14 And I understood as part of your explanation
15 that Temperature Surveys for all wells -- at all of
16 So Cal Gas's wells are done before the withdrawal
17 season.

18 Did I understand that right?

19 WITNESS NEVILLE: That's the practice, is
20 to conduct these Temperature Surveys in late fall prior
21 to withdrawal, yes.

22 BY MR. GRUEN:

23 Q. Okay. I'm sorry. And I'm just -- So it's
24 late fall prior to withdrawal. Okay.

25 And, so, when was the Temperature Survey for

1 SS-25 scheduled in 2015? Do you happen to know?

2 WITNESS NEVILLE: I don't happen to know
3 when it was scheduled. I wasn't working in the field
4 in 2015.

5 BY MR. GRUEN:

6 Q. Okay.

7 WITNESS NEVILLE: But I'll -- Let me
8 clarify the -- the scheduling part of the answer.

9 With over 100 wells, we would get started, I
10 said, late fall. Sometimes it was early fall. And it
11 depended on -- somewhat on the inventory.

12 But the idea is to get -- get all the wells
13 temperature surveyed. And so there's coordination
14 with -- with the -- with the two-day shut-in period
15 prior to the survey.

16 So there's -- there's not a set schedule that,
17 every -- every day, on every -- a well will be
18 scheduled on this date every year.

19 BY MR. GRUEN:

20 Q. Understood.

21 And I understand further that it wasn't your
22 role to oversee the Temperature Surveys in 2015. I
23 think I get that part.

24 Am I following that right?

25 WITNESS NEVILLE: Yes.

1 BY MR. GRUEN:

2 Q. Okay. If it was, if it had been your role to
3 do that, how would you have prioritized the Temperature
4 Surveys on the wells, timing-wise?

5 WITNESS NEVILLE: I could explain how I
6 prioritized them over the years that I worked there.

7 BY MR. GRUEN:

8 Q. Please. That's helpful.

9 WITNESS NEVILLE: So, the idea was to --
10 just really to get them done. And what I would allow
11 was, the -- the field people, the Gas Storage
12 Specialists that worked in our group, I would allow
13 them to -- to schedule the wells so that they could
14 work the wells in a most efficient manner, whether it
15 be geographically, or to kind of avoid as much impact
16 on withdrawal as possible, because we're still required
17 to maintain our withdrawal commitments while we're
18 conducting these Temperature Surveys.

19 So we can't schedule too many of, say, the
20 better wells out of service at one time or it's going
21 to affect our withdrawal rate.

22 So the Gas Storage Specialist would be -- They
23 worked directly with Operations. They take the wells
24 out of service in time to get them -- get the
25 Temperature Surveys run.

1 But as far as prioritization, there were just
2 the -- the task was to get them all done.

3 BY MR. GRUEN:

4 Q. Okay. Did you look at anything like age of
5 well or leak history on the well or anything in order
6 to determine which ones should get done first?

7 I'm noting your point about accommodating the
8 withdrawal season. I get that.

9 WITNESS NEVILLE: (Nodding head.)

10 BY MR. GRUEN:

11 Q. Were any other factors like that considered in
12 terms of prioritization?

13 WITNESS NEVILLE: Not that -- No. The
14 idea was to -- as I mentioned, to -- since they were
15 done every year over a -- the two- or three-month time
16 period, the idea was just to get them completed.

17 MR. GRUEN: Okay. Thank you.

18

19 EXAMINATION

20 BY MS. SOLIS:

21 Q. Can you just -- Can you please tell me what
22 you mean by two- and three- -- what specific two- and
23 three-month time period usually?

24 WITNESS NEVILLE: It would -- The -- The
25 goal was to -- to try to get them done before

1 November 1st, because that's when we -- we could start
2 seeing some withdrawal, and our pressures would start
3 dropping in the reservoir. So the idea was to get them
4 done before November 1st.

5 Now, with over 100 wells, we're only able to
6 do so many at a time, so we . . . we would allow a
7 coup -- two or three months, if my recollection is
8 correct of that time period, of getting them completed.
9 And it could have been slightly longer or slightly
10 less.

11 But I've started late summer when -- if the
12 inventory was high, just to start some of these going.
13 But typically they were -- they were done over the
14 fall.

15 BY MS. SOLIS:

16 Q. And injection would continue typically till
17 what month in a calendar year?

18 WITNESS NEVILLE: Well, that would vary,
19 too. The season was, you know, November 1st, but
20 depending on system demands, injection could go well
21 into -- through November into December.

22 (Pause in proceedings.)

23

24 EXAMINATION (RESUMED)

25

1 BY MR. GRUEN:

2 Q. How -- How . . .

3 Regarding the idea being to get the wells done
4 before November 1st, the Temperature Surveys on the
5 well, in your role, in your capacity, how often was
6 that November 1st goal date met?

7 WITNESS NEVILLE: I don't recall. It --
8 It would be easy to look at the -- go back and look at
9 the records. It's not -- The requirement is to get
10 them done by the calendar -- by the year. So if we
11 happen to have gotten some in December, that -- that
12 wasn't an issue. It was to get them done -- get an
13 annual survey, typically at the higher pressures. That
14 was the goal.

15 BY MR. GRUEN:

16 Q. Understood. Okay. Thank you.

17 Okay. I want to switch topics, if we can, and
18 talk about the role that each of you had, specifically
19 for well SS-25 now, the role that each of you had in --
20 related to the well kill attempts for SS-25 beginning
21 on October 23rd, 2015. So that's the general -- This
22 set of questions is intended to get at that.

23 So, Mr. -- Mr. Neville, could you -- Maybe
24 we'll start with you.

25 Could -- Could you walk us through day by day

1 kill by kill the role you played in each well kill
2 attempt.

3 WITNESS NEVILLE: Yes. I was in -- in
4 Storage Asset Development at the time, as you know from
5 looking at the record. I was in a different
6 department.

7 So, do you want -- How do you want to do this?
8 Start from --

9 BY MR. GRUEN:

10 Q. May --

11 WITNESS NEVILLE: -- when?

12 BY MR. GRUEN:

13 Q. Maybe -- Maybe chronologically, so the
14 beginning -- If you could start at the beginning when
15 you first assumed a role. And I'm assuming that you
16 did assume a role. You can correct me if I'm mistaken.

17 But assuming that you start -- you had a role
18 in each well kill attempt, when you first started and
19 walk us through. And take your time. This is meant to
20 elicit some detail, so a longer answer is fine.

21 In terms of for each well kill attempt, what
22 your role was and, to the best of your recollection,
23 timing helps, dates and times. I know it's a while
24 ago --

25 WITNESS NEVILLE: Yes.

1 BY MR. GRUEN:

2 Q. -- but that -- that's helpful as well.

3 WITNESS NEVILLE: Well, I had actually no
4 role in the -- the well kills.

5 BY MR. GRUEN:

6 Q. Okay. That's a short answer.

7 (Laughter.)

8 BY MR. GRUEN:

9 Q. Okay. What -- When the well kills were
10 happening, what was your role?

11 WITNESS NEVILLE: So the -- the first --
12 If we start from October 23rd, I was -- I was on -- I
13 wasn't even in the field. I was on vacation.

14 I got back from vacation, and I went to my job
15 in Chatsworth and worked in my Storage Asset
16 Development job for a week or two, and then was asked
17 to report to Aliso to assist with some of the data
18 requests that we were getting from the agencies.

19 BY MR. GRUEN:

20 Q. Okay.

21 WITNESS NEVILLE: And the -- Just
22 facilitate with helping people that were brought in to
23 the -- to the response, just to try to help educate and
24 facilitate some of the response -- data responses.

25

1 BY MR. GRUEN:

2 Q. I guess you may have seen surprise on my face
3 when you answered you had no role.

4 I guess part of what I'm wondering is, did you
5 use any of your background to advise those who were
6 taking an active role in doing the well kill attempts?

7 WITNESS NEVILLE: I didn't use my -- I
8 didn't advise. I didn't make any advisements to the --

9 BY MR. GRUEN:

10 Q. Okay.

11 WITNESS NEVILLE: -- to the team.

12 BY MR. GRUEN:

13 Q. Were you told -- Were -- Were you asked not to
14 do so?

15 WITNESS NEVILLE: No, I wasn't asked not
16 to do so.

17 BY MR. GRUEN:

18 Q. Okay. Was it your role to do data requests
19 from agencies generally prior to October 23rd?

20 WITNESS NEVILLE: No. I -- In some small
21 capacity, there would be occasional requests, but not
22 to the extent that I did in that November of 2015.

23 BY MR. GRUEN:

24 Q. Were you told why you were asked to report to
25 Aliso to assist with data requests from agencies?

1 WITNESS NEVILLE: Well, they -- the team
2 needed some help with the response.

3 BY MR. GRUEN:

4 Q. Okay. Okay. Mr. Egbert, same set of
5 questions, and if your answer is equally short, I'll
6 try to act less surprised.

7 But -- But what was your role? And starting
8 at the -- at the beginning, if you would. What was
9 your role with regards to the well kill attempts at
10 Aliso beginning October 23rd, 2015?

11 WITNESS EGBERT: Well, I would say that
12 my role was a supporting role --

13 BY MR. GRUEN:

14 Q. Okay.

15 WITNESS EGBERT: -- during the initial
16 well kill attempts on October 23rd and 24 -- on
17 October 23rd-24th.

18 BY MR. GRUEN:

19 Q. Yes.

20 WITNESS EGBERT: So . . . the -- My role,
21 as I see it, was to support the initial well kill
22 effort.

23 The very first one was tubing kill effort.
24 The second one was a casing kill effort. And I was
25 taking direction from the Well Site Manager who had

1 been assigned the primary responsibility of trying to
2 kill the well. And I was assisting with logistics and
3 assisting him as needed, I would say.

4 After the initial well kill attempts failed
5 and a contractor was called in, an expert contractor
6 was called in to . . . to manage the well, my role
7 ended at that point.

8 BY MR. GRUEN:

9 Q. Okay. Then let me, if I may, ask for a bit of
10 clarification and more detail.

11 Who was the Well Manager that you were taking
12 direction from when you had an active role supporting
13 the well kill attempts?

14 WITNESS EGBERT: It was Alan Fortenberry,
15 who worked for Krummrich Engineering.

16 BY MR. GRUEN:

17 Q. Yes.

18 WITNESS EGBERT: And he was assigned the
19 responsibility of attempting the well kill.

20 BY MR. GRUEN:

21 Q. Understood. And what logistics did you assist
22 him with?

23 WITNESS EGBERT: Mostly, it was
24 mobilization of all of the equipment needed for a well
25 kill operation: Contacting the multiple vendors and

1 equipment operators, and getting them mobilized in a
2 safe manner, and basically supporting Alan as he
3 needed.

4 BY MR. GRUEN:

5 Q. Alan Fortenberry?

6 WITNESS EGBERT: Alan Fortenberry.
7 Sorry.

8 BY MR. GRUEN:

9 Q. No. I was clarifying.

10 Okay. Thank you.

11 With regards to the initial well kill
12 effort -- I mean, I recognize you -- you had
13 distinguished the first -- you had talked about a
14 tubing kill effort and then a casing kill effort.

15 So would you call the tubing kill effort Well
16 Kill Attempt 1 and the casing Well Kill Attempt 2?
17 Would that be a fair way to characterize it?

18 WITNESS EGBERT: Yes.

19 BY MR. GRUEN:

20 Q. Okay. With regards to the casing kill effort.
21 So we -- I want to -- I want to clarify.

22 We had understood from Mr. Fortenberry that,
23 during the casing kill effort, there was a -- a fissure
24 in the ground that he observed.

25 WITNESS EGBERT: (Nodding head.)

1 BY MR. GRUEN:

2 Q. So I want -- I want to just put that out there
3 and see if you recall a fissure in the ground during
4 the casing kill effort, if -- if our understanding from
5 him -- if our understanding of what he said is accurate
6 as far as your recollection goes.

7 WITNESS EGBERT: Okay. So your question
8 is?

9 BY MR. GRUEN:

10 Q. Did you observe a fissure in the ground during
11 the casing kill effort?

12 WITNESS EGBERT: Yes.

13 BY MR. GRUEN:

14 Q. Okay. Can you explain what you observed.

15 WITNESS EGBERT: Well, it -- it was
16 during the casing kill pumping. So, a few minutes into
17 the pumping, the -- at one point in time, a split in
18 the ground adjacent to the well, just a split in the
19 ground opened up and a visible audible stream of gas
20 was coming out of it --

21 BY MR. GRUEN:

22 Q. Yes.

23 WITNESS EGBERT: -- which did not exist
24 prior to the casing kill effort.

25

1 BY MR. GRUEN:

2 Q. I follow. Thank you.

3 At what -- As best you can, at what point in
4 time during the casing effort did you observe the
5 fissure?

6 WITNESS EGBERT: Well, I -- I -- I don't
7 recall well enough to give you a timeline other than to
8 say that, after the pumping began -- sometime after the
9 pumping began, the fissure opened up --

10 BY MR. GRUEN:

11 Q. Okay.

12 WITNESS EGBERT: -- at which time we
13 ceased pumping. Al -- Alan directed the Pump Operator
14 to cease pumping.

15 BY MR. GRUEN:

16 Q. Understood. Thank you.

17 If you could, at the time that you observed
18 the fissure, given your -- your engineering background
19 and experience, what inferences could you draw about
20 what had happened?

21 WITNESS EGBERT: Are you asking what
22 inferences I -- what -- what inferences I had at that
23 time?

24 BY MR. GRUEN:

25 Q. Yes, sir.

1 WITNESS EGBERT: At that time.

2 BY MR. GRUEN:

3 Q. At that time.

4 WITNESS EGBERT: I wasn't sure.

5 BY MR. GRUEN:

6 Q. Okay.

7 WITNESS EGBERT: I wasn't sure what --
8 Something had changed. I didn't view it as a positive
9 change. And I thought that shutting down the pump
10 equipment was the right thing to do.

11 BY MR. GRUEN:

12 Q. Okay. I'm gleaning that, since -- since you
13 were working with Alan Fortenberry, that you had spoken
14 with him at some point in time, perhaps either -- When
15 did you first speak with him?

16 WITNESS EGBERT: Well, before, during and
17 after the well kill attempts. He communicated to me
18 very clearly that a well kill was going to be attempted
19 prior to the equipment being mobilized.

20 We worked all night to get the vendors there,
21 the equipment there, to get it mobilized and everything
22 connected. I assisted in those logistics, and Alan
23 Fortenberry and I collaborated on that effort.

24 And, then, once the -- So -- Yeah. So, during
25 that time frame, we communicated quite a bit.

1 BY MR. GRUEN:

2 Q. Understood. Okay.

3 And in order to do your role, what documents
4 did you review prior to the first well kill effort for
5 the tubing?

6 WITNESS EGBERT: I'm sorry. I didn't
7 quite catch that. What documents?

8 BY MR. GRUEN:

9 Q. Did you review anything in order to do the --
10 to do your role in the well kill effort for the tubing?

11 WITNESS EGBERT: No.

12 BY MR. GRUEN:

13 Q. Okay. And same question for the casing.

14 WITNESS EGBERT: No.

15 BY MR. GRUEN:

16 Q. Okay.

17 WITNESS EGBERT: No, I didn't.

18 BY MR. GRUEN:

19 Q. Okay.

20 WITNESS EGBERT: Not that I recall, I
21 should say. I may have -- Yeah, not that I recall.

22 BY MR. GRUEN:

23 Q. Understood. Thank you.

24 And you said that, after the 24th, your
25 support role in the initial well kill effort stopped.

1 I think I understood. Is that right?

2 WITNESS EGBERT: It was when the well
3 kill experts from Boots & Coots arrived that my role in
4 the well kills ended.

5 BY MR. GRUEN:

6 Q. Okay. On the 24th? That's when they arrived?

7 WITNESS EGBERT: So that was -- When --
8 When they arrived, yeah. I don't remember. It was a
9 long night. I don't remember exactly when they
10 arrived, but it was at the first -- first meeting. The
11 responsibility of killing the well was handed over to
12 them by upper management.

13 BY MR. GRUEN:

14 Q. Okay. Did you meet with Boots & Coots when
15 they arrived?

16 WITNESS EGBERT: I was included in a
17 meeting with Boots & Coots and upper management.

18 BY MR. GRUEN:

19 Q. Okay. And what did you discuss? What was
20 the -- Let me ask you:

21 What was discussed in the meeting that you
22 attended?

23 WITNESS EGBERT: I would characterize
24 that meeting as a handoff from Alan Fortenberry and
25 Todd Van de Putte to Boots & Coots, in -- in which

1 details on the initial well kills were shared with
2 Boots & Coots. And a lengthy Q-and-A session went on
3 where they asked questions and -- and they were
4 addressed to Alan and Todd. Some may have been
5 directed to me on some of the logistical issues. Yeah.

6 BY MR. GRUEN:

7 Q. Okay. Thank you.

8 Were any decisions made at that meeting? Do
9 you recall?

10 WITNESS EGBERT: Well, one decision was
11 that Boots & Coots was taking responsibility for the
12 well and that, from that point forward, they were --
13 they had control of the well, and they took complete
14 responsibility, and we were all told to . . .

15 Well, I would just say that we were told to
16 step back from a role of responsibility.

17 BY MR. GRUEN:

18 Q. Okay. And so after that meeting, you -- you
19 stepped back from the role of responsibility, I assume.

20 WITNESS EGBERT: (Nodding head.)

21 BY MR. GRUEN:

22 Q. And --

23 THE WITNESS: Yeah. I would say so, yes.
24 I was given other -- other things to do.

25

1 BY MR. GRUEN:

2 Q. Okay. Did you have any role -- Were you asked
3 to do anything at a later point in time after that
4 meeting?

5 WITNESS EGBERT: Could you narrow that
6 down? In regards to what?

7 BY MR. GRUEN:

8 Q. With regards to the well kill attempts on
9 SS-25. Excuse me.

10 WITNESS EGBERT: I would say no.

11 BY MR. GRUEN:

12 Q. Okay. Understood.

13 And who made the decision at the meeting for
14 Boots & Coots to take complete responsibility? Do you
15 recall?

16 WITNESS EGBERT: I think it would have
17 been Bret Lane.

18 BY MR. GRUEN:

19 Q. Okay. Do you recall who was at the meeting,
20 as best you can?

21 WITNESS EGBERT: Yeah. I -- I could list
22 from memory a few -- some of the main players in the
23 meeting, if you'd like.

24 BY MR. GRUEN:

25 Q. Yes, please.

1 WITNESS EGBERT: So, there were at least
2 two individuals from Boots & Coots in the meeting.
3 There may have been a third.

4 BY MR. GRUEN:

5 Q. Okay.

6 WITNESS EGBERT: Bret Lane was there.
7 Phil Baker was -- was in the room.

8 (Pause in proceedings.)

9 THE WITNESS: Let's see who else.

10 There were probably another five or six
11 individuals at least. Todd Van de Putte and Alan
12 Fortenberry, obviously, were in the room, and four or
13 five other individuals, and I can't recall with
14 certainty their names.

15 BY MR. GRUEN:

16 Q. Understood. That's very helpful. Thank you.

17 Okay. I want to switch gears and ask -- Okay.

18 So . . .

19 Were either of you kept apprized of the well
20 kill attempts as they were happening?

21 WITNESS EGBERT: In my case, no.

22 BY MR. GRUEN:

23 Q. Okay. Thank you.

24 Mr. Neville?

25 WITNESS NEVILLE: No.

1 BY MR. GRUEN:

2 Q. Okay. I want to ask you, then -- Give me just
3 a moment.

4 (Pause in proceedings.)

5 BY MR. GRUEN:

6 Q. Mr. Egbert, with regards to the first two well
7 kill attempts for the -- the tubing and the casing,
8 this set of questions, I'm trying to get a sense of
9 those attempts and what procedures were used, if any,
10 in order to do those well kill attempts.

11 WITNESS EGBERT: (Nodding head.)

12 BY MR. GRUEN:

13 Q. So with that in mind, was -- Are you familiar
14 with the terms "routine planned well kill attempt" and
15 "emergency well kill attempt"?

16 WITNESS EGBERT: Familiar with their
17 terms? I . . . I would -- No, I would say no.

18 BY MR. GRUEN:

19 Q. Okay.

20 WITNESS EGBERT: Not specifically, no.

21 BY MR. GRUEN:

22 Q. Okay. Are you familiar with -- Have you read
23 the procedures with regards to -- Southern California
24 Gas Company's procedures at the time with regards to
25 well kill attempts?

1 WITNESS EGBERT: I think, at that point
2 in time, I had not because it was not part of my
3 responsibility.

4 BY MR. GRUEN:

5 Q. Understood. Okay. Okay.

6 (Pause in proceedings.)

7 BY MR. GRUEN:

8 Q. In your mind, whose responsibility would it
9 have been to review the -- and -- and apply the
10 procedures for doing the well kill attempts?

11 WITNESS EGBERT: Well, at that time, my
12 view was that Alan Fortenberry and Todd Van de Putte
13 were the two experts and that they would -- that they
14 would have been using a standard practice or procedure
15 that they felt was appropriate for the situation.

16 BY MR. GRUEN:

17 Q. Yes.

18 To your knowledge, had a Well Kill Plan been
19 developed in order to do the first two well kill
20 attempts on the tubing and the casing?

21 WITNESS EGBERT: Well, I believe Alan
22 Fortenberry had a plan, but I'm not privy to the
23 details of his plan.

24 BY MR. GRUEN:

25 Q. Understood. Okay.

1 WITNESS EGBERT: Or I wasn't at that
2 time.

3 BY MR. GRUEN:

4 Q. And have you since learned?

5 WITNESS EGBERT: No, no --

6 BY MR. GRUEN:

7 Q. Okay.

8 WITNESS EGBERT: -- I haven't. Sorry.

9 BY MR. GRUEN:

10 Q. Not at all. Not at all. That's helpful.

11 (Pause in proceedings.)

12 MR. GRUEN: 11:41.

13 (Pause in proceedings.)

14 MR. GRUEN: Okay. Let's go off the
15 record for a moment.

16 (Whereupon, a discussion was held off

17 the record commencing at 11:42 a.m.)

18 (Proceedings resumed at 11:46 a.m.:)

19 MR. GRUEN: Let's go back on the record.

20 And if we could -- For this portion, if we
21 could go under seal.

22 (The following pages 65 through 75 are
23 confidential.)

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1 (Continuation of Non-Confidential Testimony)

2 MR. GRUEN: Okay. Okay. Just as a
3 housekeeping matter --

4 MS. CLORFEINE: Are we on the record
5 still?

6 MR. GRUEN: Yes, we are.

7 Let's go off the record.

8 (Whereupon, a discussion was held off
9 the record commencing at 11:58 a.m.)

10 (Lunch recess taken at 11:59 a.m.)

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1 Friday, November 9, 2018 1:06 p.m.

2 ---000---

3 MR. GRUEN: Let's go back on the record.

4 BY MR. GRUEN:

5 Q. Mr. Neville, I wanted to ask you a couple of
6 clarification questions.

7 I think I understood before the break, before
8 lunch, that you had no role in the well kill attempts.

9 Did I understand that right?

10 WITNESS NEVILLE: I . . . No, I didn't
11 have any role in the well kill.

12 BY MR. GRUEN:

13 Q. Okay. And that you were asked to do -- handle
14 data responses during the time of the well kill
15 attempts.

16 Did I get that right as well?

17 WITNESS NEVILLE: Yeah, that -- that's
18 correct.

19 BY MR. GRUEN:

20 Q. Okay. Were you asked to do -- Were any other
21 data requests asking about the well kill attempts?

22 WITNESS NEVILLE: No.

23 BY MR. GRUEN:

24 Q. Okay.

25 WITNESS NEVILLE: Not that I recall,

1 because I -- I wasn't involved with the well kill so it
2 wouldn't make sense for me to provide any data --

3 BY RIGHT1:

4 Q. What --

5 WITNESS NEVILLE: -- response in the well
6 kill.

7 BY MR. GRUEN:

8 Q. What was the content of the data requests
9 generally?

10 WITNESS NEVILLE: The content? Well,
11 there were -- They had requests from DOG -- from the
12 DOGGR. There were data requests from the CPUC. There
13 were data requests from OSHA.

14 Those are the -- the three -- I think the
15 major sources of data requests.

16 BY MR. GRUEN:

17 Q. What were they about?

18 WITNESS NEVILLE: So DOGGR's --

19 BY MR. GRUEN:

20 Q. At a high level, please.

21 WITNESS NEVILLE: A high level?

22 DOGGR had asked for some information on the
23 well, historical information. They'd asked for a list
24 of the asset work done in the field over a certain time
25 period.

1 That -- That was about all I can remember for
2 DOGGR.

3 BY MR. GRUEN:

4 Q. Not SS-25.

5 WITNESS NEVILLE: No.

6 BY MR. GRUEN:

7 Q. Okay. Any others?

8 WITNESS NEVILLE: So the CPUC?

9 BY MR. GRUEN:

10 Q. Please.

11 WITNESS NEVILLE: So there were -- There
12 was -- The first data request I can remember was the
13 SE -- the -- I forget what number it is. But it was
14 asking for -- This is a while ago, two, three years
15 ago.

16 BY MR. GRUEN:

17 Q. Sure.

18 WITNESS NEVILLE: So, it was asking for
19 information on -- historical information on the well.
20 The way the -- I think it had to do with operations in
21 the field, that type of thing.

22 BY MR. GRUEN:

23 Q. Again, not SS-25?

24 WITNESS NEVILLE: Well, SS-25 -- There
25 were some questions about the historical data on SS-25.

1 BY MR. GRUEN:

2 Q. Uh-huh.

3 WITNESS NEVILLE: So it was a list -- to
4 provide the well -- the Well File, the Temperature
5 Surveys, the Noise Logs. Those -- Those are some of
6 the things. Historical pressures.

7 BY MR. GRUEN:

8 Q. Was it related to this proceeding? Was it a
9 data request from Safety and Enforcement Division? Do
10 you recall?

11 WITNESS NEVILLE: Yes.

12 BY MR. GRUEN:

13 Q. Okay. So what -- I think you're reference in
14 not recalling the number is -- is suggesting it was --
15 it was one of the data requests that perhaps this team
16 asked.

17 WITNESS NEVILLE: It was an SED DOGGR
18 data request and they were numbered. So I don't
19 know -- I don't really know where -- where the request
20 came from. I just know --

21 BY MR. GRUEN:

22 Q. Okay.

23 WITNESS NEVILLE: -- that it was a SED
24 data request.

25

1 BY MR. GRUEN:

2 Q. Okay. Understood.

3 WITNESS NEVILLE: Yeah.

4 BY MR. GRUEN:

5 Q. And OSHA?

6 WITNESS NEVILLE: OSHA had requested some
7 information, too.

8 BY MR. GRUEN:

9 Q. Okay. Related to SS-25?

10 WITNESS NEVILLE: Yes.

11 BY MR. GRUEN:

12 Q. Can you say more?

13 WITNESS NEVILLE: I . . . I don't recall.
14 It was so long ago, and it . . .

15 I just don't recall. But I do -- I do
16 remember it was related to SS-25, and they did ask for
17 some information on SS-25.

18 BY MR. GRUEN:

19 Q. And did you use your own expertise or did you
20 consult others in order to answer the SS-25-related
21 questions from OSHA and CPUC?

22 MR. STODDARD: Objection: Responses
23 today are prepared at the direction of counsel. So in
24 terms of how the -- the communications related to the
25 preparation of data request, other than the data

1 request itself, and Mr. Neville's knowledge as relevant
2 to the subject matter would be privileged.

3 MR. GRUEN: I'm going to note -- And I'm
4 going to take -- I'm going to certify the record in we
5 have to.

6 Let's go off the record for just a second.

7 (Whereupon, a discussion was held off

8 the record commencing at 1:11 PM)

9 (Proceedings resumed at 1:13 p.m.:)

10 MR. GRUEN: Back on the record, please.

11 While we were off the record, we discussed the
12 nature of the objection.

13 My understanding was that while the objection
14 was based on attorney-client privilege because
15 Mr. Neville was instructed to do communications at the
16 direction of counsel, SED is asserting that be --
17 that -- that it's asking factual questions and asking
18 questions about Mr. Neville's observations, and that
19 those -- that line of questioning is okay.

20 And I understood, I think, that SoCalGas does
21 not have concerns with us asking about Mr. Neville's
22 observations with regards to the data responses.

23 Am I getting that right? Or I --

24 MR. STODDARD: No.

25 MR. GRUEN: -- look for clarification.

1 Okay.

2 MR. STODDARD: SoCalGas's objection on
3 this line of questioning is that preparation of data
4 responses are done at the direction of counsel and
5 communications related to preparations of data
6 responses are, therefore, privileged.

7 We did not have a concern related to questions
8 about factual observations made by Mr. Neville that are
9 relevant to data requests and data responses, that's
10 correct.

11 But just to be clear, again, preparation of
12 data responses and communications related thereto done
13 at direction of counsel are privileged.

14 So as to whether or not we have a concern,
15 it'll depend on a particular question.

16 MR. GRUEN: Okay.

17 MR. STODDARD: And then, again, you
18 know . . .

19 Anyhow, so we can proceed.

20 MR. GRUEN: Why don't we do this question
21 by question and if you have an objection based on
22 attorney-client, we'll note it, and based on that,
23 we'll see how this goes.

24 BY MR. GRUEN:

25 Q. So let me try and restate the question,

1 Mr. Neville.

2 You -- I think I understood from you that you
3 had -- you had responded to certain data requests from
4 the PUC and from OSHA that were related to SS-25.

5 Did I get that right?

6 WITNESS NEVILLE: Yes.

7 BY MR. GRUEN:

8 Q. And then the question I asked -- and I think
9 this is may be where we're triggering, was, you had --
10 triggering an objection -- was that you -- whether you
11 had communications with others in order to answer
12 your -- those data -- any of those data requests
13 pertaining to SS-25.

14 MR. STODDARD: I'm not concerned about
15 that question in particular.

16 MR. GRUEN: Okay.

17 MR. STODDARD: You -- Yeah.

18 MR. GRUEN: Okay.

19 MR. STODDARD: And, again, that's a
20 yes-or-no question.

21 MR. GRUEN: Indeed it is.

22 WITNESS NEVILLE: So, this -- this --
23 It's -- It's a broad question.

24 There's been data requests that I've been
25 working on for two and a half years or so. So your

1 question was, did I consult with others on any of those
2 data requests?

3 BY MR. GRUEN:

4 Q. Yes.

5 WITNESS NEVILLE: I would say that
6 there's probably -- Well, I'm trying to remember a
7 specific case.

8 (Pause in proceedings.)

9 WITNESS NEVILLE: I don't re -- I just
10 don't recall a specific case. I wouldn't be surprised
11 if I did consult with others.

12 BY MR. GRUEN:

13 Q. Okay.

14 WITNESS NEVILLE: Most of it was going in
15 the well files.

16 BY MR. GRUEN:

17 Q. Okay. So you went into the Well File in order
18 to answer the data responses?

19 WITNESS NEVILLE: Yes.

20 BY MR. GRUEN:

21 Q. Okay. And what did you gather from the Well
22 File?

23 WITNESS NEVILLE: Well, it depended on
24 the data request.

25

1 BY MR. GRUEN:

2 Q. Okay.

3 WITNESS NEVILLE: And . . .

4 BY MR. GRUEN:

5 Q. What are --

6 WITNESS NEVILLE: Over the course of
7 two -- two and a half years, there were -- there
8 were -- there are many data requests I worked on.

9 BY MR. GRUEN:

10 Q. What are the things that you recall gathering
11 from the Well Files in order to answer the data
12 requests relating to SS-25?

13 MR. STODDARD: I'm going to object on
14 this partially because the question is so broad,
15 without reference to a specific data response, that it
16 necessarily is going to be implicating privileged
17 information in the way it's -- I mean, it's asked --
18 We -- I mean, we haven't established yet how many data
19 responses Mr. Neville may have worked on.

20 He's recalled going to the Well File. You're
21 asking him to recall broadly related to any of those
22 any sorts of Well File information he may have pulled
23 on this.

24 I think if you want to consult -- It might
25 make this easier to reference a specific data response.

1 MR. GRUEN: Let me try and get it just a
2 different way.

3 (Pause in proceedings.)

4 BY MR. GRUEN:

5 Q. What -- What information do you recall --
6 Never mind the data requests for a second.

7 What information do you recall pulling related
8 to SS-25 from the Well File dur -- post-October 23rd,
9 2015?

10 WITNESS NEVILLE: So, regarding SS-25.

11 BY MR. GRUEN:

12 Q. Yes, sir.

13 (Pause in proceedings.)

14 WITNESS NEVILLE: To say -- I think some
15 of the que -- the -- Some of the questions from the
16 data response were to provide the Well File.

17 So, in the sense of trying to figure out what
18 I -- what exactly I did to -- to provide for that
19 specific case, it was just a matter of -- of . . .
20 of . . . of identifying what consisted of the -- of the
21 Well File for the well.

22 And after making that identification, the --
23 the attorney -- the people in charge of the data
24 responses would -- provided the information.

25

1 BY MR. GRUEN:

2 Q. Okay. But you --

3 WITNESS NEVILLE: So --

4 BY MR. GRUEN:

5 Q. Go ahead.

6 WITNESS NEVILLE: So to say that I went
7 into the Well File and, you know, actually physically
8 pulled things from -- from the Well File, I guess that
9 wouldn't be the case. It was --

10 BY MR. GRUEN:

11 Q. Okay.

12 WITNESS NEVILLE: -- what -- what
13 constituted the Well File.

14 So I identified to -- to the team providing
15 the -- the response to the data request what would
16 constitute the Well File for the well.

17 BY MR. GRUEN:

18 Q. And -- And someone else pulled the Well File
19 in order to answer the data request, then?

20 WITNESS NEVILLE: Well, the -- the well
21 files had been scanned at that time.

22 BY MR. GRUEN:

23 Q. So what source of information did you use in
24 order to answer the data requests pertaining to SS-25?
25 I'm not clear what --

1 WITNESS NEVILLE: Yeah.

2 BY MR. GRUEN:

3 Q. Let -- Let -- Let me be very specific:

4 Was it a hard copy Well File or a digitized
5 copy of the Well File?

6 WITNESS NEVILLE: What was provided was a
7 digitized copy of the Well File because they were
8 scanned.

9 BY MR. GRUEN:

10 Q. So you used the digitized copy of the Well
11 File?

12 WITNESS NEVILLE: No. I . . . I -- With
13 my knowledge of the Well File, I instructed or relayed
14 the information to the team that had ownership or
15 control or the ability to extract this particular --
16 these particular files from the database. So --

17 BY MR. GRUEN:

18 Q. Okay.

19 WITNESS NEVILLE: -- I don't know if that
20 makes sense.

21 BY MR. GRUEN:

22 Q. It's -- It's helpful. It does make sense to
23 me and it's helpful.

24 I think I'm gleaning from that that you were
25 pulling -- you were instructing others to pull

1 information from the digital version of the Well File
2 for SS-25.

3 Am I getting that right?

4 WITNESS NEVILLE: That's correct.

5 And in the case of that particular request, it
6 was an early request to provide the SS-25 Well File.
7 And, so, using my knowledge of what constitutes the
8 SS-25 Well File, I instructed the -- the team, who had
9 the ability to -- to provide this from the electronic
10 database, that information.

11 BY MR. GRUEN:

12 Q. Okay.

13 (Pause in proceedings.)

14 BY MR. GRUEN:

15 Q. Did you have communications -- I think I'm --
16 What I'm struggling with is, you answered data requests
17 pertaining to SS-25, but you did not have any
18 communications with those who were working on the well
19 kill attempts on SS-25.

20 WITNESS NEVILLE: That's correct.

21 BY MR. GRUEN:

22 Q. Okay. Mr. Neville, you have a lot of
23 experience related to the field at Aliso.

24 WITNESS NEVILLE: I've worked at Aliso
25 since 2007, so I have about seven years or so.

1 BY MR. GRUEN:

2 Q. Yeah.

3 I think what I'm -- why I'm hesitating is, I'm
4 just wondering -- Let -- Let -- Maybe we should -- we
5 should do a hypothetical.

6 Put yourself in the position of -- of the
7 decision-maker for a second, given your knowledge base;
8 okay?

9 Do you have that in mind? When I say
10 "decision-maker," I mean specifically related to making
11 decisions about Aliso and --

12 WITNESS NEVILLE: In general or with --

13 BY MR. GRUEN:

14 Q. Specific to Well SS-25 and the Well File.

15 WITNESS NEVILLE: Specific to SS-25.

16 BY MR. GRUEN:

17 Q. Yes.

18 If you were in that position, given your
19 experience and experience, would you have assigned
20 yourself to work on SS-25 in some capacity?

21 THE WITNESS: I've got --

22 MR. STODDARD: Objection: Calls for an
23 extreme amount of speculation.

24 MR. GRUEN: I'm asking his professional
25 opinion.

1 WITNESS NEVILLE: It does.

2 MR. GRUEN: Your objection is noted. I'd
3 like him to answer the question.

4 WITNESS NEVILLE: It -- It -- It calls
5 for me speculating about a person in that role making
6 that decision. I just . . .

7 BY MR. GRUEN:

8 Q. You can't answer the question?

9 WITNESS NEVILLE: No.

10 MR. GRUEN: Okay.

11

12 EXAMINATION

13 BY MR. SHER:

14 Q. Just to make sure, if I may.

15 The hypothetical would be that you're the
16 Incident Commander in charge of the attempts to kill
17 the leaking well SS-25.

18 And as the Incident Commander, would you want
19 people on the team that were most knowledgeable about
20 SS-25 and the Aliso field?

21 WITNESS NEVILLE: The difficulty I have
22 with answering that question is that -- is, Boots &
23 Coots, the contractor, is . . . is the entity now
24 taking responsibility for the -- the kill.

25 So they have this expertise that -- and this

1 is their -- their call, their decision, that they --
2 they need to make.

3 And to put myself in their shoes, I -- you
4 know, that they're the experts. They do emergency well
5 kills around the world. So, I -- That's -- That's why
6 it's kind of speculation to me.

7 BY MR. SHER:

8 Q. Sorry. I think there's been a
9 misunderstanding as to the hypothetical.

10 So, to your understanding, was there an
11 Incident Commander overseeing operations to kill the
12 leak at Aliso post-October 23rd, 2015?

13 WITNESS NEVILLE: A lot of it, I -- I
14 don't really know. I -- I was involved with my
15 specific role.

16 BY MR. SHER:

17 Q. Let me ask it this way:

18 Does the phrase or term "Incident Commander"
19 mean anything to you?

20 WITNESS NEVILLE: Well, it does.
21 There -- I was aware that there was an Incident
22 Commander on -- on the -- the well kill.

23 BY MR. SHER:

24 Q. And, so, in -- in -- Based on your knowledge,
25 what is the role of an Incident Commander?

1 WITNESS NEVILLE: (Shaking head.)

2 Yeah, I -- I don't -- I just don't know, I.
3 To deal with the -- the incident, the logistics of
4 dealing with the incident.

5 BY MR. SHER:

6 Q. To try and attempt to stop the leak.

7 WITNESS NEVILLE: Well . . .

8 It -- It -- It sounds -- I mean, I -- That's
9 just a -- It sounds correct. I mean, the Incident
10 Commander would -- that would be one of his -- his or
11 her responsibilities.

12 BY MR. SHER:

13 Q. What we're struggling with is, based on -- on
14 testimony to date, it is clear that you have subject
15 matter expertise as to the state of wells, how Aliso
16 Canyon is operated and maintained.

17 I assume that someone like you would
18 understand better than you explained now what an
19 Incident Commander is and what their roles would be.
20 And it's hard for me to understand how you can't put
21 yourself in their shoes in a hypothetical where we have
22 a big blowout.

23 And the question directly to you was, would
24 you not want reporting to you -- would you not want to
25 speak to the subject matter expert at the field?

1 WITNESS NEVILLE: Well, the Incident
2 Commander . . . it's hard to put myself in that
3 person's shoes.

4 That person must have probably felt they had
5 the people they needed to handle the -- I -- to deal
6 with the situation.

7 BY MR. SHER:

8 Q. So at no point -- So you were on vacation when
9 the leak first happened?

10 WITNESS NEVILLE: I was -- Yes, I was on
11 vacation.

12 BY MR. SHER:

13 Q. Do you recall about when you came back from
14 vacation?

15 WITNESS NEVILLE: I was -- I came back
16 early Sunday morning, so I was back in the office on
17 Monday.

18 BY MR. SHER:

19 Q. And that would be around October 26th?

20 WITNESS NEVILLE: If the 23rd is Friday,
21 24th -- that would be the 26th, right.

22 BY MR. SHER:

23 Q. And, to your recollection, upon returning to
24 the office, were you asked to help inform any of the
25 decision-making as to how to stop the leak?

1 WITNESS NEVILLE: No.

2 BY MR. SHER:

3 Q. Were you surprised at not being asked?

4 WITNESS NEVILLE: No, I wasn't. There
5 were other SoCalGas engineers with Boots & Coots that
6 had responded that were there from -- from the
7 beginning and who have familiarity with -- with wells
8 and the well construction.

9 So there -- there were others there, certainly
10 capable people, so I -- I -- I didn't feel the need
11 to . . . you know, to kind of insert myself into that
12 operation.

13 And I wasn't asked, so . . .

14 BY MR. SHER:

15 Q. So an individual like a Todd Van de Putte, who
16 was believed directing Mr. Fortenberry as to what steps
17 to take, that would be a person that was capable in
18 informing the Incident Commander as to what had
19 occurred and -- and what the field looks like,
20 et cetera.

21 WITNESS NEVILLE: I would say that's
22 correct.

23 BY MR. SHER:

24 Q. Going forward, if there were to be another
25 leak at Aliso or any of the fields that you have

1 experience with, would you think it important to talk
2 to someone like yourself about the state of the field?

3 WITNESS NEVILLE: If in -- If in the
4 future?

5 BY MR. SHER:

6 Q. Right.

7 WITNESS NEVILLE: I -- I think it's
8 important to have people up there that do know -- that
9 have some experience with -- with wells, well
10 construction --

11 BY MR. SHER:

12 Q. Who --

13 WITNESS NEVILLE: -- yes.

14 BY MR. SHER:

15 Q. To the degree you know, who would you
16 consider -- Mr. Egbert we've heard testify today and
17 has experience -- subject matter experience at -- at
18 Aliso. You yourself have subject matter experience at
19 Aliso.

20 Other than the two of you, who would you say
21 is the most knowledgeable about the state of the Aliso
22 Canyon gas storage field?

23 WITNESS NEVILLE: Well, it's -- it's a
24 broad question. There's a lot of different roles and
25 expertise there.

1 BY MR. SHER:

2 Q. I appreciate that.

3 So . . . with regards to storage field
4 engineering.

5 WITNESS NEVILLE: Um-hmm.

6 BY MR. SHER:

7 Q. Other than the two of you, who else would have
8 knowledge about the storage field engineering?

9 WITNESS NEVILLE: So, within -- within
10 the realm of storage field engineering, there's the --
11 the -- the well construction, the well killing, the
12 well -- working on wells.

13 Those would be Todd Van de Putte, who's had
14 that role for many years. The Well Side Managers that
15 we have in -- that I've worked with have many, many
16 years of working at -- at the field at Aliso Canyon.

17 So there's Alan Fortenberry and others, Well
18 Side Managers, that have that type of -- of experience
19 with well construction and, you know, to understanding
20 the down-hole components in a well.

21 The -- The monitoring function that -- that
22 Tom and I've covered today, you know, we're certainly
23 both experienced there. There's another Engineer there
24 that we've worked with that also has experience.

25

1 BY MR. SHER:

2 Q. And that person's name is?

3 WITNESS NEVILLE: Azra Kargar. She's
4 another Engineer that worked there with us.

5 BY MR. SHER:

6 Q. Um-hmm. With regards to the Well File, I
7 think you had stated that you knew the Well File pretty
8 well; is that correct?

9 WITNESS NEVILLE: That's correct.

10 BY MR. SHER:

11 Q. To the best of your recollection or knowledge,
12 do you know if the records in the Well File for SS-25
13 were accurate and correct?

14 WITNESS NEVILLE: That's -- That's a
15 pretty broad question, but I --

16 BY MR. SHER:

17 Q. During the time period of October 22nd
18 through --

19 MR. GRUEN: End of February.

20 BY MR. SHER:

21 Q. -- end of February 2016.

22 WITNESS NEVILLE: The end of
23 October 22nd?

24 BY MR. SHER:

25 Q. 2015.

1 WITNESS NEVILLE: 2015.

2 BY MR. SHER:

3 Q. Do you know if the well files during that time
4 period, so October 2015 through February 2016, do you
5 know whether or not the records in the well files --

6 WITNESS NEVILLE: Well files.

7 BY MR. SHER:

8 Q. -- were accurate and correct?

9 WITNESS NEVILLE: I have no reason to
10 believe they -- they would be incorrect.

11 BY MR. SHER:

12 Q. Do you know if they were complete?

13 WITNESS NEVILLE: They were -- As -- To
14 my knowledge, the well files are complete.

15 MR. GRUEN: Okay.

16 MR. SHER: Thank you.

17 WITNESS NEVILLE: Okay.

18

19 EXAMINATION (RESUMED)

20 BY MR. GRUEN:

21 Q. Do you know -- Are you familiar, Mr. Neville,
22 with the term "wellbore schematic"?

23 WITNESS NEVILLE: Yes.

24 BY MR. GRUEN:

25 Q. What does that term mean at a high level?

1 WITNESS NEVILLE: So, the wellbore
2 schematic is a depiction of the components in the well.

3 BY MR. GRUEN:

4 Q. Okay. And is the wellbore schematic important
5 for operation and maintenance of the well?

6 WITNESS NEVILLE: It -- The -- The
7 wellbore schematic is -- is a useful tool to help with
8 the, yeah, various operations and maintenance
9 activities.

10 BY MR. GRUEN:

11 Q. And what does the wellbore schematic enable
12 Southern California Gas Company to do with relation to
13 operations and maintenance activities?

14 WITNESS NEVILLE: So, for the O&M
15 activities that I'm familiar with, running a
16 temperature -- This is just an example.

17 Running a temperature tool down the wellbore,
18 a wellbore schematic can be helpful to the -- the
19 operator of the wireline unit so that that person knows
20 the size of the tubing, the -- the depth of the tubing,
21 the -- the location of different tubing components, the
22 total depth of the well, things like that.

23 BY MR. GRUEN:

24 Q. And how -- How is the wellbore schematic used
25 for purposes of day-to-day activities?

1 WITNESS NEVILLE: The schematic is not
2 typically used in a day-to-day fashion. It's typically
3 used to -- as a tool to help plan a workover, or to run
4 a Temperature Survey, or to set a down-hole choke, or
5 to shift a sleeve, or -- Different activities that
6 would take place within the well, a wellbore schematic
7 can -- can be a useful tool.

8 BY MR. GRUEN:

9 Q. Okay. And how would . . .

10 You gave a description of a Temperature
11 Survey. You discussed that at some length this
12 morning.

13 How about a -- a . . . a well choke? What do
14 you use that for?

15 WITNESS NEVILLE: A well choke. A choke
16 is used to control the -- the flow rate of a well.

17 BY MR. GRUEN:

18 Q. Okay. What about some of the other activities
19 that you described? What are the purposes of them?

20 WITNESS NEVILLE: So, I described a case
21 of setting a bottom hole choke, which is a choke
22 that's -- that's actually placed inside the wellbore.
23 There's chokes that are placed at the surface, and
24 there's chokes that are placed at the bottom of the
25 wellbore.

1 A wellbore schematic would be helpful in the
2 placement of -- of the types of chokes that go into the
3 bottom of the -- into the tubing in the bottom of the
4 well.

5 BY MR. GRUEN:

6 Q. Okay.

7 WITNESS NEVILLE: He mentioned shifting a
8 sliding sleeve.

9 BY MR. GRUEN:

10 Q. Yeah.

11 WITNESS NEVILLE: That's a -- A sliding
12 sleeve is normally used when a well is . . . put back
13 into operation after a workover.

14 A sliding sleeve can be -- In that particular
15 case, the well is full of workover fluid and so a
16 sliding sleeve can be opened with wireline tools, and
17 the wellbore fluid can be removed from the well and
18 replaced with gas.

19 So a wellbore schematic help -- helps with the
20 Operator to operate that sliding sleeve.

21 BY MR. GRUEN:

22 Q. Okay. Thank you.

23 Have you had any concerns with wellbore
24 schematics following October 23rd, 2015?

25 WITNESS NEVILLE: October 23rd?

1 BY MR. GRUEN:

2 Q. Following when --

3 WITNESS NEVILLE: Oh, following the --

4 BY MR. GRUEN:

5 Q. -- the incident began.

6 Yeah, I' -- I'm using that --

7 WITNESS NEVILLE: Yeah.

8 BY MR. GRUEN:

9 Q. -- just interchangeably. I could -- I could
10 mention the incident if it's more helpful.

11 WITNESS NEVILLE: Oh, no.

12 In -- In problems? I haven't had any problems
13 with wellbore schematics.

14 BY MR. GRUEN:

15 Q. Okay.

16 WITNESS NEVILLE: I do recall
17 having . . . a third-party company come in and update
18 our schematics that we -- that we had.

19 So we had -- we had some schematics that were
20 hand-drawn and in place for -- for many, many years.

21 And then we had -- We were building some new
22 schematics with Wellview. The new schematics, in my --
23 my mind, weren't as -- as nice as I wanted them, and
24 especially providing them to -- to a regulator.

25 We were asked by DOGGR to start providing some

1 schematics. We were getting ready to bring in eight
2 workover rigs. We were getting ready to start a big
3 project on our wells.

4 So, knowing that, we had a certain number of
5 schematics which, in my mind, weren't a best -- weren't
6 a great depiction of -- of the -- the well. I didn't
7 think they were as good as the hand-drawn schematics.

8 I had a company called InterAct upgrade all of
9 our schematics to be consistent and follow more of the
10 hand-drawn design that I had been accustomed to.

11 BY MR. GRUEN:

12 Q. Did you have any concerns with the hand-drawn
13 schematics for well bores at the time that you brought
14 in InterAct?

15 WITNESS NEVILLE: The hand-drawn
16 schematics, I didn't have concerns with the
17 hand-drawns. I had concerns with the Wellview
18 schematics.

19 BY MR. GRUEN:

20 Q. And why did you have concerns with the
21 Wellview schematics?

22 WITNESS NEVILLE: They just -- They
23 weren't able to depict in a ni -- in a very concise way
24 what was in the well. They were . . . They were --
25 They were just -- In my mind, they were difficult to

1 read.

2 And they . . . The Wellview just didn't have
3 the -- the -- At least at that time, it didn't have the
4 ability to show a schematic -- the schematic, one that
5 I believed we should be submitting to -- to an agency,
6 and using, especially in a project going forward, where
7 we're going to -- we're going to go from zero to eight
8 rigs. We're going to -- We need to start this project.
9 And so that's . . . what I initiated with this company
10 called InterAct.

11 BY MR. GRUEN:

12 Q. Why had DOGGR asked SoCalGas to provide
13 schematics?

14 WITNESS NEVILLE: The Notice of Intent to
15 work over a well requires a -- a Notice form, plus a
16 workover program, plus a schematic.

17 BY MR. GRUEN:

18 Q. So I think I'm hearing -- That answer suggests
19 that's been an ongoing regulation.

20 WITNESS NEVILLE: The --

21 BY MR. GRUEN:

22 Q. Am I following that right?

23 WITNESS NEVILLE: It -- It doesn't -- It
24 didn't explicitly say in the regulations that a
25 schematic needed to be submitted.

1 BY MR. GRUEN:

2 Q. Okay.

3 WITNESS NEVILLE: It -- The regulations
4 now do, the ones -- the new gas storage regulations do
5 specify casing diagrams, but the regulations at the
6 time did not.

7 But DOGGR had asked us to, when we do submit
8 the NOIs, that we submit schematics with them. At
9 least, that's my recollection.

10 BY MR. GRUEN:

11 Q. Um-hmm.

12 WITNESS NEVILLE: I just knew that we --
13 we were going to be going in every well and it was a
14 chance to get schematics consistently produced.

15 BY MR. GRUEN:

16 Q. To your recollection, approximately when had
17 DOGGR asked SoCalGas to provide schematics? When --
18 When did that begin?

19 WITNESS NEVILLE: Well, to my knowledge,
20 it was when we were going from zero to eight rigs.

21 Now, it's possible that they were asking Todd
22 Van de Putte, who was the Drilling and Workover
23 Engineer, for schematics for some of the work that he
24 was doing, but I'm not privy to that.

25 I just know that -- And I don't know who --

1 where the information -- who gave me that information,
2 but that was -- In my mind, that was something that we
3 were going to be producing along with our work program
4 and the NOI to DOGGR.

5 BY MR. GRUEN:

6 Q. Okay. Approximately how long had InterAct
7 been working to upgrade the schematics to be consistent
8 with the hand-design drawings before you developed
9 your -- your opinion about the schematics?

10 WITNESS NEVILLE: How long had they been
11 working on it?

12 Well, they didn't start working on it until I
13 asked them to, so my opinion was prior to their
14 starting.

15 I -- I believe that the schematics needed to
16 be upgraded, and then I asked InterAct to do it.

17

18 EXAMINATION (RESUMED)

19 BY MS. ROSE:

20 Q. How long had Well Lifecycle been working on
21 the schematics, I think, before you developed your
22 opinion?

23 WITNESS NEVILLE: So I -- Well Lifecycle
24 wasn't someone -- wasn't a contractor that was under my
25 direction.

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EXAMINATION (RESUMED)

BY MR. GRUEN:

Q. Are you familiar with Well Lifecycle?

WITNESS NEVILLE: Only in -- in some brief way, that they -- yes, that they were -- worked on the Wellview database.

EXAMINATION (RESUMED)

BY MS. ROSE:

Q. So it was their schematics that you were -- you found --

WITNESS NEVILLE: No. No. It's -- It's -- The schematics, I think, were -- It's not something that Well Lifecycle did.

BY MS. ROSE:

Q. Okay.

WITNESS NEVILLE: I think that nearly anyone that draws uses Wellview -- that had used Wellview to a draw schematic before we even asked Wellview -- Well Lifecycle --

BY MS. ROSE:

Q. Um-hmm.

WITNESS NEVILLE: -- to work on it.

1 BY MS. ROSE:

2 Q. Okay.

3 WITNESS NEVILLE: I -- It just didn't --
4 My -- This is my personal preference with schematics.
5 It wasn't -- It was something that I thought we needed
6 to get consistently updated since we were getting ready
7 to do this big -- big project.

8 BY MS. ROSE:

9 Q. Other than not being easy to read, which I
10 think you mentioned, was there anything else wrong with
11 the schematics from Well -- in Wellview?

12 WITNESS NEVILLE: That was -- That was my
13 main complaint. They were just not very easy to read.
14 There were -- A lot of the data could be squished
15 together on the bottom, and it was hard to see.

16 Some of the font sizes were really small and
17 it was just difficult to -- The use of space in -- in
18 the presentation in the schematic just wasn't what I
19 was familiar with and knew what could be accomplished
20 with a hand-drawn copy.

21

22 EXAMINATION (RESUMED)

23 BY MR. GRUEN:

24 Q. One -- One question that I had was, I think,
25 just the ordering.

1 So did I get it right that you had a concern
2 with the schematics before InterAct came onboard to do
3 their work?

4 WITNESS NEVILLE: Yes.

5 BY MR. GRUEN:

6 Q. Why?

7 WITNESS NEVILLE: It's -- It -- Just to
8 me, it -- the schematics -- the quality of the
9 schematics weren't what I wanted to see.

10 BY MR. GRUEN:

11 Q. And -- And when you -- Just to clarify:

12 In that statement, the quality of the
13 schematics not being what you wanted to see, are you
14 referring to the hand-drawn schematics now?

15 WITNESS NEVILLE: No. The Wellview --
16 The Wellview-generated schematic. It's a depiction
17 of -- of the database, so the -- there's entry of
18 different well attributes, you know, the tubing, the
19 casing, the hole size, the cement. All that is entered
20 into the Wellview database and, you know, can be
21 referenced in tables and such.

22 But when Wellview generates the schematic
23 based on that data, it -- it just -- it didn't generate
24 it to -- to the degree -- to the degree of quality that
25 I -- that I could see and knew could be obtained from a

1 hand-drawn schematic.

2 BY MR. GRUEN:

3 Q. And -- And was -- Were the schematics
4 generated from Wellview used to do the operations and
5 maintenance activities that you shared with us that are
6 done using wellbore schematics?

7 WITNESS NEVILLE: They were.

8 BY MR. GRUEN:

9 Q. And, to your knowledge, how, if at all, did
10 that impact activities?

11 WITNESS NEVILLE: For a person, say,
12 running a Temperature Survey or shifting a sleeve,
13 the -- the -- the data that -- from a -- from a
14 Wellview schematic, such as the tubing size or the
15 depth of the sleeve, they're looking at really specific
16 little pieces of data that's really of interest to
17 their work. And it -- it . . .

18 The data that they needed was in the
19 schematic. If it was -- You know, if it wasn't, it
20 would be easy to -- to find from the table in Wellview
21 or from the -- the activity -- the activity of that
22 particular day when that particular equipment was
23 installed.

24 So, when one is doing a particular activity,
25 such as shifting a sleeve, you know, as I mentioned,

1 there's certain data entered that you really need to
2 have.

3 BY MR. GRUEN:

4 Q. Yeah.

5 WITNESS NEVILLE: And so you -- you have
6 the Wellview schematic. It -- You could more than
7 likely get that data off that schematic. If you
8 didn't -- If the data wasn't there and easily found, it
9 could be obtained from the database within Wellview.

10 BY MR. GRUEN:

11 Q. Are you aware of occasions where it could
12 neither be found in the schematic nor the database?

13 WITNESS NEVILLE: No.

14 BY MR. GRUEN:

15 Q. Okay.

16 (Pause in proceedings.)

17 BY MR. GRUEN:

18 Q. In -- In -- In terms of . . . timing, are you
19 aware how far back Wellview was used for schematics?

20 WITNESS NEVILLE: It was in the early
21 2000s. I'm not sure exactly when. But when I -- When
22 I got back to the field in 2007, Wellview was -- was in
23 place. That was the -- the system that the Drilling
24 and Workover Group were -- were using.

25

1 BY MR. GRUEN:

2 Q. When did you develop your opinion as to the
3 quality of wellbore schematics in Wellview?

4 WITNESS NEVILLE: It was -- It was early
5 on.

6 BY MR. GRUEN:

7 Q. Had you voiced the concern that --

8 WITNESS NEVILLE: Yeah.

9 MR. GRUEN: -- you've told us about to
10 others in SoCalGas?

11 WITNESS NEVILLE: Yes. We -- The team
12 did the best and made the best of the schematics, but
13 it -- Although they were not that pleasing, they were
14 still usable.

15 But to me, I think -- and especially when
16 we're -- we're being asked to provide this information
17 to -- to a -- to a regulator, for one, I think we
18 needed to have something that was -- that ultimately
19 became DOGGR's regulation to have the type of
20 information in the format that we presented it.

21 So, for -- for our purposes, it -- it --
22 although it wasn't a perfect depiction, it was
23 sufficient.

24 BY MR. GRUEN:

25 Q. You -- You mentioned, I think, that -- I think

1 I heard you say that the information -- if you had to
2 get the information pertaining to an operation and
3 maintenance activity, you could do so, either through
4 the schematic or the database.

5 Did I get that right?

6 WITNESS NEVILLE: Yes.

7 BY MR. GRUEN:

8 Q. Okay. Are you aware of occasions where
9 operations and maintenance activity work was slowed as
10 a result of the difficulty getting information from
11 Wellview?

12 WITNESS NEVILLE: Slowed? I'm not aware
13 of -- of slowed.

14 BY MR. GRUEN:

15 Q. Or any -- any -- any sense of delays?

16 WITNESS NEVILLE: I -- I don't -- I don't
17 know of any delays. It's . . .

18 The database is just -- is just the -- in the
19 same -- You're working in the same part of Wellview,
20 you know, the schematic is. It's just another click to
21 get to the database.

22 So it's -- You know, it's a delay of making
23 a -- going to a different place in the program but not,
24 you know, slowed in the sense of really slowing down
25 O&M or anything.

1 BY MR. GRUEN:

2 Q. Okay. Are you aware of -- Or did you have
3 concerns about inaccuracies with the wellbore
4 schematics in Wellview?

5 WITNESS NEVILLE: I -- I didn't. Any
6 source of data is -- You know, as an Engineer, you use
7 with -- You know, assuming that, you know, that's what
8 you have to rely on, I -- I -- I didn't see any
9 inaccuracies that -- that I can recall.

10 BY MR. GRUEN:

11 Q. Same question --

12 WITNESS NEVILLE: I mean, that's a
13 general -- that's a kind of a broad question and --

14 BY MR. GRUEN:

15 Q. Yes.

16 WITNESS NEVILLE: -- you know, whether or
17 not there was something, I don't recall it.

18 BY MR. GRUEN:

19 Q. Okay. Granted, it's broad, and I appreciate
20 your -- your doing your best to recall.

21 Did you learn in hindsight any . . . Strike
22 that.

23 Did you have any concerns with there being
24 gaps in the data, the wellbore schematic data in
25 Wellview?

1 WITNESS NEVILLE: So, a gap. I'm trying
2 to understand what a gap might consist of.

3 BY MR. GRUEN:

4 Q. Incomplete data.

5 WITNESS NEVILLE: With -- With the --
6 The -- The idea that the data is -- And it depends on
7 which data you're -- you're after. So, if you're
8 interested in the tubing data, which would -- which as
9 I mentioned, you know, the size of the tubing, the
10 different depths of the components --

11 BY MR. GRUEN:

12 Q. Yes, sir.

13 WITNESS NEVILLE: So, as I mentioned, you
14 can go to the wellbore schematic. You could go to the
15 database. You could go to the activity of that
16 particular day that it was installed. And it would
17 be -- That's kind of the original source of where that
18 data's coming from is that it's -- it's in the
19 description that the Well Site Manager puts into the
20 activity of that day.

21 You know, the Well Site Manager will, say, ran
22 to and set certain grade size and weight tubing, set it
23 at a certain depth.

24 And, so, with that one explanation, that in
25 and of itself is -- is normally what -- But you would

1 need to, say, run Temperature Surveys, sleeves, do --
2 do that type of work.

3 BY MR. GRUEN:

4 Q. Okay.

5 WITNESS NEVILLE: So, in addition to
6 that, there's -- there's attachments within Wellview
7 where the contractor who provided some of those
8 components to SoCalGas, they, in most cases, would have
9 also submitted a schematic and it could have also been
10 attached to Wellview.

11 So there's -- there's various places to go
12 within the program to -- you know, to be confident
13 that -- that you are acquiring the data that you need
14 to do that particular operation that you're planning on
15 doing.

16 BY MR. GRUEN:

17 Q. Okay. I -- I'm not clear that answers the
18 question. It may. But let me just be sure.

19 I'm not clear if you had any -- or have any
20 concerns with incomplete data within Wellview
21 pertaining to wellbore schematics.

22 WITNESS NEVILLE: I don't -- I didn't
23 have any concerns with incomplete data. I had concerns
24 with the depiction itself --

25

1 BY MR. GRUEN:

2 Q. Okay.

3 WITNESS NEVILLE: -- the presentation.

4 MR. GRUEN: Understood.

5 (Pause in proceedings.)

6 MR. GRUEN: Can we go under seal?

7 Let's go off the record for a moment.

8 (Whereupon, a discussion was held off

9 the record commencing at 1:59 PM)

10 (Recess taken at 2:00 PM)

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1 (Proceedings resumed at 2:07 p.m.):

2 MR. GRUEN: Can we go on the record,
3 Candace?

4 MR. STODDARD: Which one is -- I'm sorry
5 what are we doing?

6 MS. ROSE: The e-mail from earlier.

7 MR. GRUEN: This is Exhibit 3, which is
8 the -- the e-mail from Avidah Razavi --

9 MR. STODDARD: Yeah.

10 MR. GRUEN: -- to Tom Egbert. It's that
11 thread on January 29th, and we have the Bates stamp
12 now.

13 MR. STODDARD: Can we just wait until
14 everybody's back in the room --

15 MR. GRUEN: It -- It --

16 MR. STODDARD: -- before we go on the
17 record.

18 MR. GRUEN: Sure. Let's go off the
19 record.

20 (Whereupon, a discussion was held off
21 the record commencing at 2:08 p.m.)

22 (Proceedings resumed at 2:10 p.m.):

23 MR. GRUEN: Why don't we go on the
24 record.

25 Ms. Rose, would you like to identify the Bates

1 stamp for Exhibit 3?

2 MS. ROSE: Yes. The Bates stamp for
3 Exhibit 3 is AC_CPUC_SED_KITSON_0000946.

4 MR. GRUEN: Thank you.

5 (The following pages 122 through 154 are
6 confidential.)

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1 (Continuation of Non-Confidential Testimony)

2 BY MR. GRUEN:

3 Q. Are either of you familiar with procedures or
4 standards that apply to well kills?

5 (Pause in proceedings.)

6 BY MR. GRUEN:

7 Q. SoCalGas procedures or standards that apply to
8 well -- to well kills.

9 WITNESS NEVILLE: Yes. I would say
10 I'm -- I'm familiar with the fact that we -- we do have
11 the standard that references well kills.

12 BY MR. GRUEN:

13 Q. Mr. Egbert?

14 WITNESS EGBERT: Yes.

15 BY MR. GRUEN:

16 Q. Okay. I'd like to ask some questions with
17 relation to standards and procedures that apply to well
18 kills. So that's -- that's in general. That -- That's
19 what this line of questions is intended to get at.

20 And . . . I'm not going to direct the question
21 at anyone. I'll leave it to whoever feels -- which --
22 whichever of you feels is appropriate --

23 WITNESS EGBERT: Okay.

24 BY MR. GRUEN:

25 Q. -- to answer.

1 So, some of these questions are -- have -- are
2 specific, and I'll hand out the procedures in a moment
3 that we've got.

4 But I'm -- I'm curious if you can identify
5 applicable procedures or standards or other SoCalGas
6 requirements that set forth how to do a well kill.

7 Do you have an idea of how many procedures,
8 standards, other requirements SoCalGas has with regards
9 to well kills?

10 And let me be specific as to time. I'm
11 talking about at the time of the incident, from October
12 to -- October 2015 and after until Well SS-25 was
13 killed.

14 WITNESS NEVILLE: Yes.

15 So, it's been a long time since I've looked at
16 those standards.

17 There was a routine well kill procedure, and I
18 believe there's an emergency well kill procedure.

19 BY MR. GRUEN:

20 Q. Indeed.

21 Would -- Perhaps it would be helpful to -- to
22 hand them out just -- and give an opportunity for
23 review.

24 MR. GRUEN: Why don't we go off the
25 record for a moment.

1 (Whereupon, a discussion was held off
2 the record commencing at 2:54 p.m.)
3 (Proceedings resumed at 2:55 p.m.):)

4 MR. GRUEN: So back on the record.
5 The document that is entitled "Well
6 Operations-Well Kill SCG 224.0030" is marked as
7 Exhibit 5.

8 And "Routine Well Kills SCG 224.045" is marked
9 as Exhibit 6.

10 (The documents referred to were marked
11 as Exhibit Nos. 5 & 6 by the
12 Reporter.)

13 MR. GRUEN: Let's go back off the record.
14 (Whereupon, a discussion was held off
15 the record commencing at 2:56 p.m.)
16 (Proceedings resumed at 3:06 p.m.):)

17 MR. GRUEN: Let's go back on the record.
18 And so we have distributed Exhibits 5 and 6.

19 BY MR. GRUEN:

20 Q. And, Mr. Neville, before we distributed these,
21 I had understood you to mention that -- I -- I had
22 understood you to talk about routine and emergency well
23 kill procedures.

24 Did I understand that right?

25 WITNESS NEVILLE: Yes.

1 BY MR. GRUEN:

2 Q. Okay. Can you explain at a high level what
3 each of those are and the difference between them.

4 WITNESS NEVILLE: So, one point of
5 clarification here is that, as the Storage Field
6 Engineer, whether the kill were routine or emergency,
7 it's not something that, in my job function as Storage
8 Field Engineer in O&M, I would do the well kills. I
9 would call somebody in the Drilling and Workover Group,
10 or the -- well, somebody in the Drilling and Workover
11 Group to do the -- the routine kill or emergency kill.

12 BY MR. GRUEN:

13 Q. Okay.

14 WITNESS NEVILLE: So --

15 BY MR. GRUEN:

16 Q. Understood.

17 WITNESS NEVILLE: -- just to make that
18 clarification.

19 BY MR. GRUEN:

20 Q. That's helpful.

21 WITNESS NEVILLE: Okay.

22 BY MR. GRUEN:

23 Q. Understood.

24 Can you . . .

25 Are -- Are you -- Do you feel that you have

1 the experience in order to give us a definition? Point
2 noted that you would contact someone else.

3 Do you feel you have the experience to give us
4 a definition of a routine kill and an emergency kill at
5 a high level?

6 WITNESS NEVILLE: High level?

7 Routine well kill would be, you're planning on
8 putting a workover rig on the well. That -- High
9 level.

10 BY MR. GRUEN:

11 Q. Yeah.

12 WITNESS NEVILLE: Emergency well kill is
13 something -- what the -- something needs to be killed
14 on the well in a quick manner.

15 BY MR. GRUEN:

16 Q. Okay.

17 WITNESS NEVILLE: So high level --

18 BY MR. GRUEN:

19 Q. Yes.

20 WITNESS NEVILLE: -- without really
21 digging into the details of either one of these.

22 BY MR. GRUEN:

23 Q. That's perfect. That's very -- That's
24 helpful. And . . .

25 Well, I'll leave it to both of you. But,

1 Mr. Egbert, I know you had mentioned you had done some
2 support work on the initial -- the first two well kill
3 attempts this morning.

4 So, with that high-level understanding, which
5 of those . . .

6 Do -- Do you know, those two well kill
7 attempts, were they considered routine or emergency.

8 Do you know?

9 WITNESS EGBERT: I -- I think I could
10 say, since I was not managing the well kill, Alan
11 Fortenberry and Todd were managing the well kill, in
12 my -- At that time, my understanding was that they were
13 not a routine well kill, that it was an emergency well
14 kill.

15 BY MR. GRUEN:

16 Q. Understood. And -- And what was the basis of
17 your understanding?

18 WITNESS EGBERT: Because the intent was
19 not to -- it was not for a normal workover. It was not
20 to fill the -- fill the well with fluid in order to put
21 a rig on it. It was to stop a leak.

22 BY MR. GRUEN:

23 Q. I follow.

24 Okay. With that in mind, if I could turn your
25 attention -- and this is an example where you may want

1 more time, so, certainly, if you do need that, we can
2 go off the record -- Exhibit 5, so that's the Well
3 Operations-Well Kill, at the top right corner it's
4 224.0030.

5 And if we go to point four on Page 1,
6 Procedure, and I'm after 4.1.1. So I'll read it on the
7 record. And if you need time to digest it, just let us
8 know.

9 4.1.1 says, quote(reading):

10 "This document provides guidelines for
11 routine planned kill jobs. Emergency kills
12 that are performed because of unplanned
13 conditions that may result in uncontrolled
14 discharge of gas requires special procedures
15 for each case. Special Kill Plans for
16 emergency conditions are prepared by Storage
17 Engineering."

18 And "Storage Engineering's" in bold.

19 Do you want to take some time to digest that
20 point?

21 Let's go off the record a moment.

22 (Colloquy was held off the record at 3:11 p.m.)

23 (Proceedings resumed at 3:12 p.m.:)

24 MR. GRUEN: Back on the record.

25

1 BY MR. GRUEN:

2 Q. Who is -- When they talk about Storage
3 Engineering in this sentence, who would that be
4 referring to?

5 WITNESS NEVILLE: The Storage Engineering
6 is the -- encompasses the group called Reservoir
7 Engineering that I was the Manager of and the group
8 that we call Drilling -- I call Drilling & Workover.
9 It's the Drilling Engineers. So there's two -- The two
10 groups make up the Storage Engineering Department.

11 BY MR. GRUEN:

12 Q. Okay. So . . . I'm sorry. It's getting
13 late.

14 You said Reservoir Engineering. What was the
15 other group that made up the Storage Engineering?

16 WITNESS NEVILLE: Drilling.

17 BY MR. GRUEN:

18 Q. Okay.

19 WITNESS NEVILLE: It's called the
20 Drilling Group. It's a little bit of a misnomer
21 because they do more than drilling; they do workovers
22 as well.

23 BY MR. GRUEN:

24 Q. Okay.

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EXAMINATION (RESUMED)

BY MR. SHER:

Q. Is mr. Van de Putte in charge of that group?

WITNESS NEVILLE: Yes.

(Pause in proceedings.)

EXAMINATION (RESUMED)

BY MR. GRUEN:

Q. And who was in charge of Reservoir Engineering at the time of the incident?

WITNESS NEVILLE: At the time of the incident.

So, I was in Storage Asset Development. The -- The Storage -- The Engineering Manager -- Since I was out of the department, the Storage Engineering Manager at the time would have been overseeing Storage Engineering.

BY MR. GRUEN:

Q. Okay. And do you recall his name or her name?

WITNESS NEVILLE: Yeah. His name is Tom Schrader.

BY MR. GRUEN:

Q. Okay. Understood.

MR. GRUEN: Let's go off the record a

1 moment.

2 (Whereupon, a discussion was held off
3 the record commencing at 3:13 p.m.)

4 (Proceedings resumed at 3:14 p.m.):

5 MR. GRUEN: Let's go back on the record.

6 BY MR. GRUEN:

7 Q. Just do you want to add to the answer or
8 clarify?

9 WITNESS NEVILLE: Yeah. I -- Yes. Thank
10 you.

11 I said that Tom Schrader was the Storage
12 Engineering Manager. At the time, however, I do now
13 recollect that he re -- did retire prior to
14 October 20 -- October 2015, and at that time Amy Kitson
15 was the Storage Engineering Manager.

16 BY MR. GRUEN:

17 Q. Understood. Thank you.

18 Okay. With regards to . . .

19 Mr. Egbert, on 4.1.1, with regards to Special
20 Kill Plans for Emergency Conditions, do you recall a --
21 a Special Kill Plan being prepared for either of the
22 first two kill attempts that you identified this
23 morning?

24 WITNESS EGBERT: I know that . . . I
25 know that Alan Fortenberry had a Kill Plan. I'm not

1 able from memory to say that it's a, quote, Special
2 Kill Plan per the standard. I know that he had one and
3 that he was using it.

4 BY MR. GRUEN:

5 Q. Understood.

6 Do you know if he used the same one for both
7 kill attempts?

8 Do you recall?

9 WITNESS EGBERT: I didn't personally
10 review the two plans, so I can't say that -- whether
11 they were the same or they varied.

12 MR. GRUEN: Okay. Understood.

13 Let's go off the record a second.

14 (Whereupon, a discussion was held off
15 the record commencing at 3:17 p.m.)

16 (Proceedings resumed at 3:18 p.m.:)

17 MR. GRUEN: Back on the record.

18 While we were off the record, we had done one
19 housekeeping item, and then we'll have a set of
20 questions as well based on our discussion off the
21 record.

22 The housekeeping item is just to request of --
23 SED requesting of SoCalGas the Special Well Kill Plans
24 that were used for well kill attempts one and two as
25 described by Mr. Egbert.

1 And then, Mr. Sher, do you want to ask some
2 questions of Mr. Egbert.

3 MR. SHER: Sure.

4
5 EXAMINATION (RESUMED)

6 BY MR. SHER:

7 Q. Mr. Egbert, based on some testimony earlier,
8 it's our understanding that Storage Engineering
9 mentioned 4.1.1 of what I think has been marked as
10 Exhibit 5 is made up of two groups, which would be the
11 Drill Over Group (sic) and then the Storage Engineering
12 group.

13 Did I get that right?

14 WITNESS EGBERT: I'm not sure.

15 BY MR. SHER:

16 Q. Sorry. Just if we look at the -- the
17 definition of who makes up Storage Engineering. I
18 think there was testimony earlier --

19 WITNESS EGBERT: Yes.

20 BY MR. SHER:

21 Q. -- that it was Drill Over (sic) and then --

22 WITNESS EGBERT: Correct.

23 BY MR. SHER:

24 Q. -- Reservoir Engineering?

25 WITNESS NEVILLE: Reservoir Engineering.

1 WITNESS EGBERT: I recall now, yes.

2 BY MR. SHER:

3 Q. Okay. Great. And, so, then, of those two
4 groups, is it be correct that it would have been the
5 Drill Over Group (sic) -- if I've got it correctly --
6 that was headed by Mr. Van de Putte that would have
7 drafted the Emergency Kill Plan; is that correct?

8 WITNESS EGBERT: I -- I wasn't present
9 when the Emergency Kill Plan was drafted, so I don't
10 know if it was drafted by Todd Van de Putte or desig --
11 or delegated -- that responsibility delegated to Alan
12 Fortenberry.

13 MR. SHER: Okay. Understood. Thank you.

14

15 EXAMINATION (RESUMED)

16 BY MR. GRUEN:

17 Q. Okay. So if we could turn to . . .
18 Section . . .

19 Okay. Exhibit 5, so the procedure marked
20 224.0030, Section 4.2, entitled "Fluid."

21 So this -- As I understand it -- I'm
22 reading -- this prescribes certain aspects of fluid to
23 use in a well kill attempt. And so we -- we want to
24 see, Mr. Egbert, your understanding.

25 And it's not -- If -- Mr. Neville, if you have

1 anything to add, please do, but I'm directing this to
2 Mr. Egbert since, sir, you -- you talked about your
3 experience working on the first two well kill attempts
4 this morning.

5 WITNESS EGBERT: Um-hmm.

6 BY MR. GRUEN:

7 Q. Do you recall what kill fluid was used in the
8 first two attempts that you discussed this morning?

9 WITNESS EGBERT: I have some
10 recollection. And I do recall conversations --
11 overhearing conversations with Alan and others about
12 the . . . his calculation of the necessary density and
13 the weight-specific gravity of the KCL that was needed,
14 so I know that those considerations were made.

15 BY MR. GRUEN:

16 Q. Yes.

17 WITNESS EGBERT: But I didn't make the
18 final determination of the density chosen. Alan did.

19 And . . . that's what I recall.

20 BY MR. GRUEN:

21 Q. Do you know if the density of the -- Let's --
22 Just to clarify the terms, I think by "KCL," we're
23 talking about potassium fluoride?

24 WITNESS EGBERT: Yes.

25

1 BY MR. GRUEN:

2 Q. Okay. And with regards to the density, I
3 think there's some -- If I'm reading this correctly,
4 Section 4.2 prescribes some things with regards to
5 density.

6 So, for example, 4.2.1 states (reading):

7 "The fluid used to kill a well must be of
8 sufficient density to provide a 200- to
9 500-psi overbalance of the reservoir pressure
10 and viscous enough to prevent excessive fluid
11 lost to the formation."

12 Do you know if this -- if the density of the
13 fluid used was what was prescribed here?

14 WITNESS EGBERT: I wasn't -- No. I
15 wasn't privy to the calculations that -- that Alan did
16 to determine proper density.

17 I do recall him spending considerable time --

18 BY MR. GRUEN:

19 Q. Yeah.

20 WITNESS EGBERT: -- making those
21 calculations and making a determination.

22 BY MR. GRUEN:

23 Q. Okay. Understood.

24 And part of those calculations were looking at
25 whether the density of the fluid exceeded the reservoir

1 pressure, then; is that correct?

2 WITNESS EGBERT: Not quite.

3 I would characterize it as the density
4 sufficient to create an overbalance based on current
5 reservoir pressure.

6 BY MR. GRUEN:

7 Q. Far more precise, I trust, than my lay
8 understanding. Thank you for correcting me. I
9 appreciate that.

10 Do you happen to know the -- what the
11 reservoir pressure was at the time of the first two
12 kill attempts that you described?

13 WITNESS EGBERT: I did at the time. I --
14 I don't recall the -- the exact number now three years
15 later. But that was something that was looked at, I --
16 I recall.

17 BY MR. GRUEN:

18 Q. Okay. And was the . . .

19 How was it looked at? How -- In other
20 words -- I -- I see you looking back at me so I'm going
21 to try to rephrase.

22 How was the reservoir pressure -- Were there
23 readings taken, or what instruments were used in order
24 to determine the reservoir pressure at the time of the
25 two kill attempts you described?

1 WITNESS EGBERT: It's based on surface
2 pressure. The reservoir pressure is calculated based
3 on the depth of the well. The -- The depth --
4 Basically, the vertical depth of the well and the
5 shut-in wellhead pressure, so . . .

6 BY MR. GRUEN:

7 Q. Okay. And in order to get . . .

8 So the depth of the well you have and the
9 shut-in well pressure you would get a reading somehow
10 or how would you determine what that is?

11 WITNESS EGBERT: A manual pressure
12 reading of the tubing pressure would be taken. There
13 may have been . . . other considerations made by Alan,
14 and I wasn't privy to those --

15 BY MR. GRUEN:

16 Q. Okay.

17 WITNESS EGBERT: -- so I can't speak for
18 Alan.

19 BY MR. GRUEN:

20 Q. Do you have any field gauges that would be
21 used to help determine the reservoir pressure?

22 WITNESS EGBERT: Well, I would state it a
23 little differently.

24 BY MR. GRUEN:

25 Q. Yes, please.

1 WITNESS EGBERT: The pressure gauges,
2 field gauges, would be manually collected from the
3 tubing side of the well, and that pressure then would
4 be used to calculate bottom hole or reservoir pressure.

5 BY MR. GRUEN:

6 Q. Okay. So, the -- the field gauge gave you
7 an -- would it be fair to say an indirect reading of
8 the reservoir pressure based on other factors that
9 it -- it could tell you?

10 WITNESS EGBERT: One might say that, yes.

11 BY MR. GRUEN:

12 Q. Okay. But based on the field gauge's reading,
13 one could determine the reservoir pressure.

14 WITNESS EGBERT: Absolutely.

15 BY MR. GRUEN:

16 Q. Okay. I follow.

17 And was the . . .

18 Was the field gauge kept, to your knowledge?

19 WITNESS EGBERT: I'm not sure I
20 understand your question. What do you mean by "kept"?

21 BY MR. GRUEN:

22 Q. What happened to the field gauge that was used
23 to determine the reservoir pressure in the case of
24 SS-25?

25 WITNESS EGBERT: I don't know.

1 MR. GRUEN: Okay. Okay.

2 Go ahead.

3

4 EXAMINATION (RESUMED)

5 BY MR. SHER:

6 Q. Can you determine the reservoir pressure
7 without having access to a -- what we've called the
8 field gauge?

9 WITNESS EGBERT: Well, all of the
10 Operators carry pressure gauges for the purpose of
11 measuring wellhead pressure. Especially the -- the Gas
12 Storage Specialist and certain Operators within the
13 Operations Group all carry pressure gauges -- accurate
14 pressure gauges for that purpose.

15 So, I'm not so sure that a single gauge was
16 used to measure pressure. Multiple gauges may have
17 been used and pressure -- multiple pressure readings
18 may have been taken during the course of that night in
19 preparation for the well kill.

20 And the other thing to think about is, the
21 general pressure of the entire field is known by
22 Operations. And all of that information would have
23 been used by Alan to put together a Well Kill Plan.

24 BY MR. SHER:

25 Q. You mentioned that accurate gauges are used.

1 WITNESS EGBERT: (Nodding head.)

2 BY MR. SHER:

3 Q. I'm assuming that, with Operations and
4 Maintenance, the gauges are checked on a regular basis;
5 is that correct?

6 WITNESS EGBERT: I believe so, yes.

7 BY MR. SHER:

8 Q. Do you know how regularly they are checked?

9 WITNESS EGBERT: That's not part of my
10 job. We have a Measurement Group which has the
11 responsibility of calibrating their gauges on a
12 regular -- on a regular basis, is my understanding, and
13 that they at that time were not using analog gauges.
14 They were using highly accurate crystal gauges, digital
15 gauges.

16 And that's what I recall. Those are the
17 gauges I recall being used during that -- during the
18 preparation for the well kill.

19 BY MR. SHER:

20 Q. Okay. Thank you very much. It's nice to
21 understand that.

22 And so you would potentially have someone
23 reading the gauge -- I think you said it's on the
24 tubing side. Is that correct how to phrase that? Is
25 there a gauge?

1 WITNESS EGBERT: Yes.

2 BY MR. SHER:

3 Q. And to the degree another read was necessary,
4 they may have a hand-held gauge that they can take the
5 pressure as well?

6 WITNESS EGBERT: Actually, the way it
7 works is, every well, every UGS well, has a test rack.
8 A test rack is a single location where a portable gauge
9 can be . . . installed on the rack, and all of the well
10 pressures can be taken quickly, tubing, casing and
11 annuli, just by switching valves or switching location
12 of the -- of the gauge.

13 So, generally speaking, the test rack is used
14 when manual pressure readings are collected. And I
15 believe that was the case on SS-25 that evening and the
16 following day.

17 MR. SHER: Thank you.

18 (Pause in proceedings.)

19

20 EXAMINATION (RESUMED)

21 BY MR. GRUEN:

22 Q. Regarding the use of potassium chloride as the
23 kill fluid, what was the thinking behind using that as
24 the kill fluid in the kill attempts, the first two that
25 you described? If you can share, if you know.

1 WITNESS EGBERT: Well, I -- I -- I don't
2 think I can say because Alan Fortenberry really was the
3 primary designer of the Kill Plan. And I know that
4 he -- I believe, from recollection, he was the one who
5 ultimately chose the kill fluid used.

6 BY MR. GRUEN:

7 Q. Okay. I'm noting, in part, that Page 2 of 5
8 of the -- of Exhibit 5, the Well Kill -- Well
9 Operations-Well Kill Company Operations Standard,
10 224.0030, Section 4.2.1.3 states, in part (reading):

11 "The best fluid to use is formation water
12 produced from the zone to be killed if it has
13 high enough density to provide the 200- to
14 500-psi overbalance. When a higher density is
15 required, use KCL or CaCl₂ water to the needed
16 density."

17 So I'm seeing "KCL" mentioned there, which
18 I -- I understand is the fluid that Mr. Fortenberry
19 chose in --

20 WITNESS EGBERT: I believe that's
21 correct, yes.

22 BY MR. GRUEN:

23 Q. Okay. Does that suggest that -- Do you know
24 if a higher density was needed than the 200- to 500-psi
25 overbalance that's stated under 4.2.1.3?

1 WITNESS EGBERT: (Examining document.)

2 So, to restate your question, you're asking if
3 I know that -- Do I know if the density required was
4 higher than the -- than the lease brine or the produced
5 brine.

6 BY MR. GRUEN:

7 Q. Yeah, I -- I think so.

8 WITNESS EGBERT: And -- And so --

9 BY MR. GRUEN:

10 Q. Let me just be sure.

11 I think that is restating it properly,
12 although you're stating it in a way that's perhaps
13 beyond my understanding.

14 WITNESS EGBERT: Formation water. Yeah.
15 Lease brine is formation water.

16 BY MR. GRUEN:

17 Q. Okay.

18 WITNESS EGBERT: So --

19 BY MR. GRUEN:

20 Q. Go ahead.

21 WITNESS EGBERT: I think all I can say on
22 that matter is that I do recall Alan inquiring about
23 the use of both.

24 BY MR. GRUEN:

25 Q. Uh-huh.

1 WITNESS EGBERT: And I recall that he
2 finalized a decision. It was to use KCL from a vendor.
3 He chose -- He chose the -- the weight after performing
4 his calculations, and that's what was delivered, and
5 that was what was ultimately used is my recollection.

6 BY MR. GRUEN:

7 Q. Okay.

8 WITNESS EGBERT: But I don't recall the
9 specific weight that he ordered.

10 BY MR. GRUEN:

11 Q. Okay. Did -- Did you talk -- Did you talk to
12 Mr. Fortenberry at a general level about the need for a
13 heavier kill fluid -- rather, a denser -- higher
14 density kill fluid than would provide the 500-psi
15 overbalance?

16 WITNESS EGBERT: If I understand your
17 question, I did not. I had confidence in his
18 calculations --

19 BY MR. GRUEN:

20 Q. Sure.

21 WITNESS EGBERT: -- and I didn't
22 second-guess his choice of KCL weight.

23 BY MR. GRUEN:

24 Q. I'm not suggesting that, and I appreciate
25 that.

1 I -- I may not be wording it very artfully,
2 and I'll do my best to -- to restate.

3 I'm trying to get at what his thinking was, to
4 your understanding, of . . . whether he thought it was
5 necessary to use KCL higher than 500 overbalance.

6 WITNESS EGBERT: I -- I couldn't say --

7 BY MR. GRUEN:

8 Q. Okay.

9 WITNESS EGBERT: -- as to what he was
10 thinking.

11 BY MR. GRUEN:

12 Q. All right. Understood.

13 WITNESS EGBERT: I -- I had confidence
14 that he -- he ran the calculations and he had access to
15 the proper density fluid, and that's what was delivered
16 and he ultimately used.

17 MR. GRUEN: Understood. That's helpful.

18 Okay. Thank you.

19 (Pause in proceedings.)

20 MR. GRUEN: Go ahead.

21

22 EXAMINATION (RESUMED)

23 BY MS. ROSE:

24 Q. I just have a couple more questions about the
25 fluid.

1 Do you -- Do you remember what vendor he
2 purchased the fluid from?

3 Or let me rephrase.

4 Was it a vendor that you had worked with
5 before or had serviced that field before?

6 WITNESS EGBERT: I don't recall the
7 specific vendor.

8 BY MS. ROSE:

9 Q. Okay.

10 WITNESS EGBERT: But I do know it was a
11 vendor that he had worked with --

12 BY MS. ROSE:

13 Q. Okay.

14 WITNESS EGBERT: -- quite a bit.

15 And I believe it was -- I think it was the
16 same vendor that we used in most of our well kills
17 prior, normal routine well kills.

18 BY MS. ROSE:

19 Q. Do you know if they offered other kinds of
20 fluid; that is, fluid that was not based on KCL?

21 WITNESS EGBERT: I have no recollection
22 of -- of that, no.

23 BY MS. ROSE:

24 Q. Okay.

25 WITNESS EGBERT: They -- They -- Such

1 conversation wouldn't have occurred with me. It would
2 have been with Alan directly.

3 MS. ROSE: Okay.

4 MR. GRUEN: Thank you.

5 Turning to Exhibit -- Oh.

6

7 EXAMINATION (RESUMED)

8 BY MR. SHER:

9 Q. Just before we move from Exhibit Number 5.

10 If we look at the policy section, 1.1.

11 If you don't mind, do you see in bold we have
12 a Storage Field Engineer, and then below, we have
13 Storage Operations Manager and Storage Engineering
14 Manager.

15 Do you see those?

16 WITNESS EGBERT: Yes.

17 BY MR. SHER:

18 Q. Do you happen to recall, either one of you,
19 the names of the individuals who held those positions
20 around October 2015?

21 WITNESS EGBERT: Well, I certainly held
22 that position.

23 BY MR. SHER:

24 Q. Which would that be?

25 WITNESS EGBERT: Storage Field Engineer.

1 BY MR. SHER:

2 Q. Okay.

3 WITNESS EGBERT: One of . . .

4 A couple. Storage Operations Manager would
5 have been Amy Kitson, I believe, at that time, if my
6 timing's correct.

7 And Storage Engineering Manager -- No. Do I
8 have that backwards?

9 WITNESS NEVILLE: Yeah, you do.

10 WITNESS EGBERT: I'm sorry. I have that
11 backwards.

12 Operations Manager.

13 Storing Engineer Manager would have been Amy
14 Kitson; right?

15 WITNESS NEVILLE: (Nodding head.)

16 WITNESS EGBERT: And then Storage
17 Operations Manager . . .

18 WITNESS NEVILLE: That would have been --
19 Isn't it Tim Bomberger?

20 WITNESS EGBERT: At that time --

21 WITNESS NEVILLE: Or was it Glenn --

22 WITNESS EGBERT: -- it was Glenn --

23 WITNESS NEVILLE: It was Glenn.

24 WITNESS EGBERT: It was Glenn LaFevers.

25 MR. SHER: Glenn LaFevers.

1 Thank you both.

2

3 EXAMINATION (RESUMED)

4 BY MR. GRUEN:

5 Q. Turning to Exhibit 6 briefly, really, Page 1
6 of 10.

7 So this is the Routine Well Kills document,
8 Company Operations Standard Gas Operations. In the
9 upper right corner, it's 224.045.

10 So, I'm looking at 1.1 under Planning, "Prior
11 to" -- which says, in part (reading):

12 "Prior to killing the well, review the
13 Well File and discuss kill with the Storage
14 Field Engineer to ensure that a means of
15 pressure communication exists between the
16 tubing and tubing casing annulus, scheduling
17 required wireline work prior to all killing
18 operations."

19 So, as the Storage Field Engineer,
20 Mr. Egbert --

21 Do you want to take a moment to digest that?

22 WITNESS EGBERT: I'm okay.

23 BY MR. GRUEN:

24 Q. Okay. So, as the Storage Field Engineer, do
25 you know who reviewed -- Did -- Was this part -- First

1 of all, let me ask:

2 Was this part applicable at -- I see it says
3 "routine well kill" and I know you described it as an
4 emergency well kill --

5 WITNESS EGBERT: Um-hmm.

6 BY MR. GRUEN:

7 Q. -- the well kill attempt. So if this document
8 isn't applicable, I won't go down this line of
9 questioning.

10 So I guess my first question is: Is the
11 routine well kill document applicable for the first two
12 well kill attempts?

13 WITNESS EGBERT: I -- I -- I think, in
14 part, yes.

15 BY MR. GRUEN:

16 Q. And can you say more about why it is?

17 WITNESS EGBERT: Well, it provides
18 direction and killing of gas storage well.

19 Some . . . Some facets of it do not apply.
20 The facets relating to routine well kills may not --
21 may not apply. But much of it does --

22 BY MR. GRUEN:

23 Q. Understood.

24 WITNESS EGBERT: -- for an emergency well
25 kill.

1 BY MR. GRUEN:

2 Q. Does it apply to the requirement to
3 schedule -- I'm looking at the last part of Section 1.1
4 that says, "Scheduling required wireline work prior to
5 well killing operations."

6 WITNESS EGBERT: Yes.

7 BY MR. GRUEN:

8 Q. Is that part applicable, in your mind?

9 WITNESS EGBERT: Yes.

10 BY MR. GRUEN:

11 Q. Okay. And, so, in terms of the . . .
12 To your knowledge -- Well, let me just ask:
13 What -- Can you explain at a high level what
14 required wireline work is.

15 WITNESS EGBERT: Sure.

16 BY MR. GRUEN:

17 Q. Please.

18 WITNESS EGBERT: So, 1.1 states that
19 (reading):

20 "Prior to killing the well, review the
21 Well File and discuss kill with the Storage
22 Field Engineer to ensure that a means of
23 pressure communication exists between the
24 tubing and the tubing casing annulus . . ."

25

1 BY MR. GRUEN:

2 Q. Yes, sir.

3 WITNESS EGBERT: In the case of SS-25, we
4 knew that -- already that the sliding sleeve was open
5 and that communication between the tubing and the
6 tubing casing annulus did exist.

7 BY MR. GRUEN:

8 Q. Yes, sir.

9 WITNESS EGBERT: So the subsequent
10 sentence, "scheduling required wireline work," that
11 refers to situations where the sleeve might be
12 closed --

13 BY MR. GRUEN:

14 Q. Okay.

15 WITNESS EGBERT: -- and wireline work is
16 required to open the sleeve. The sleeve has to be open
17 in order to circulate fluids between the tubing and the
18 casing.

19 BY MR. GRUEN:

20 Q. Okay.

21 WITNESS EGBERT: So in the case of the
22 SS-25, its sleeve was already open so no wireline work
23 was required.

24 BY MR. GRUEN:

25 Q. Thank you.

1 Are you familiar with -- Were you consulted
2 about the -- the Well File review that's called out in
3 Section 1.1 as well?

4 WITNESS EGBERT: My understanding at the
5 time is that Todd Van de Putte and Alan Fortenberry had
6 already consulted the Well File in their preparation
7 for the kill.

8 BY MR. GRUEN:

9 Q. Understood.

10 WITNESS EGBERT: And that they . . . And
11 that they had the information they needed to complete
12 their plan.

13 BY MR. GRUEN:

14 Q. Okay. Okay. I want to step away from the --
15 the two standards for a second and just touch on
16 something you said this morning about the tubing kill
17 or well kill one and the casing well kill two.

18 And my understanding is, when the tubing kill
19 didn't work, then, under Mr. -- supporting
20 Mr. Fortenberry, you supported him to attempt the
21 casing kill.

22 Did I follow that correctly?

23 WITNESS EGBERT: I believe so, yes.

24 BY MR. GRUEN:

25 Q. Okay. And, to your knowledge, why didn't the

1 tubing kill work?

2 WITNESS EGBERT: My knowledge at the
3 time?

4 BY MR. GRUEN:

5 Q. Yes, sir.

6 WITNESS EGBERT: I didn't know.

7 BY MR. GRUEN:

8 Q. Okay.

9 WITNESS EGBERT: It was really . . .
10 I guess I can speak for myself only. I didn't
11 know why --

12 BY MR. GRUEN:

13 Q. Okay.

14 WITNESS EGBERT: -- the pump locked up
15 and the flow stopped during the tubing kill.

16 BY MR. GRUEN:

17 Q. And if memory serves, we understood from
18 Mr. Fortenberry that I think it was approximately 19
19 barrels of kill fluid had been used for the tubular
20 kill --

21 WITNESS EGBERT: Um-hmm.

22 BY MR. GRUEN:

23 Q. -- if -- if I'm tracking right.

24 Did the use of that amount of kill fluid --
25 which I understood, too, was given the calculations

1 that had been performed -- was less than the
2 approximated kill fluid that was thought to be
3 needed --

4 WITNESS EGBERT: Um-hmm.

5 BY MR. GRUEN:

6 Q. -- to complete the well --

7 WITNESS EGBERT: Right.

8 BY MR. GRUEN:

9 Q. -- kill.

10 Did the use of only 19 barrels at the time
11 give you any indication of what hadn't worked?

12 WITNESS EGBERT: Well, at the time, my
13 thinking was that the -- that volume of fluid was an
14 indication of the depth of whatever the restriction was
15 down-hole.

16 And at that time, we didn't know what that
17 restriction was, but that -- that pointed to the depth
18 of the restriction.

19 BY MR. GRUEN:

20 Q. Did you have -- Prior to beginning to inject
21 the kill fluid into the tubular -- into the tubing --
22 excuse me -- did you know whether the restriction was
23 there?

24 WITNESS EGBERT: No.

25

1 BY MR. GRUEN:

2 Q. Could it have been found out whether the
3 restriction was there prior to installing the kill
4 fluid --

5 WITNESS EGBERT: I --

6 BY MR. GRUEN:

7 Q. -- into the tubing?

8 WITNESS EGBERT: I -- I -- I don't know.

9 MR. GRUEN: Okay. Okay.

10

11 EXAMINATION (RESUMED)

12 BY MR. SHER:

13 Q. If, for example, the sleeve was closed and so
14 one needed to use wireline equipment --

15 WITNESS EGBERT: (Nodding head.)

16 BY MR. SHER:

17 Q. -- would one have noticed, in using -- trying
18 to use the wireline equipment, that it couldn't go down
19 to open the sleeve?

20 WITNESS EGBERT: Yes.

21 BY MR. SHER:

22 Q. But there was no need to do that because the
23 sleeve was open.

24 WITNESS EGBERT: Yeah. Under normal
25 circumstances, if the sleeve were closed and you wanted

1 to kill a well, you would first open the sleeve.

2 And during that operation, if there was
3 restriction in the tubing, you definitely would learn
4 that in that -- during that process because the
5 wireline would stop at that point.

6 MR. GRUEN: Okay. Let's go off the
7 record a moment.

8 (The following pages 192 through 199 are
9 confidential.)

10 (Whereupon, a discussion was held off
11 the record commencing at 3:50 p.m.)

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EXAMINATION (RESUMED)

25

1 (Continuation of Non-Confidential Testimony)

2

3 EXAMINATION (RESUMED)

4 BY MR. GRUEN:

5 Q. We're almost at the time, and if you'll
6 indulge me, I think, Mr. Egbert, just a couple of quick
7 questions about the work with Mr. Fortenberry --

8 WITNESS EGBERT: Sure.

9 BY MR. GRUEN:

10 Q. -- your supporting role for him.

11 He had used a term yesterday where he talked
12 about -- I believe it was reenergizing the well seal on
13 SS-25.

14 Does -- Are you familiar with the term
15 "reenergize" -- the phrase "reenergizing the well
16 seal"?

17 WITNESS EGBERT: Yes.

18 BY MR. GRUEN:

19 Q. Okay. And were you present for the effort to
20 reenergize the well seal?

21 WITNESS EGBERT: I was.

22 BY MR. GRUEN:

23 Q. Were you part -- Were you in the supporting
24 role for Mr. Fortenberry.

25 WITNESS EGBERT: I was in a supporting

1 role and in a position to observe the work occurring.
2 I may not have been there the entire time, but at least
3 part of the time when Cameron was energizing the seals,
4 I was present.

5 BY MR. GRUEN:

6 Q. Yes. Okay. And could any of the work
7 reenergizing the well seal have contributed to the
8 blockage in the tubing or the obstruction that -- that
9 occurred during the -- the injection of fluid into the
10 tubing during the first well kill attempt?

11 WITNESS EGBERT: So, you're asking my
12 opinion as of now whether I think doing that then could
13 have caused the tubing blockage?

14 BY MR. GRUEN:

15 Q. I think I am, yes.

16 WITNESS EGBERT: I can't think of a way
17 that it would.

18 BY MR. GRUEN:

19 Q. Okay. Okay. That's helpful. Thank you.

20 In addition -- Separate from the reenergizing
21 of the well, are you aware of any work that was
22 performed on SS-25 in an attempt to stop the leak
23 before Mr. Fortenberry arrived on-site?

24 WITNESS EGBERT: No, I'm not aware of any
25 work prior to the well kill in an attempt to stop the

1 leak, no.

2 BY MR. GRUEN:

3 Q. Okay. And I'm asking you in -- My
4 understanding is, really, you were the one of the first
5 people on site, not that you discovered the leak, but
6 that you were really one of the first lead people
7 working on -- on -- on addressing or perhaps mitigating
8 the leak.

9 Am I understanding that correctly?

10 WITNESS EGBERT: I'm not sure. I don't
11 know.

12 I believe Todd and Alan were on -- at Aliso
13 Canyon at the time, but when I first arrived at the
14 well, I didn't see them there.

15 BY MR. GRUEN:

16 Q. Anyone else who you think might have been
17 working on mitigating the leak before you? Is there
18 anyone you can identify for us?

19 WITNESS EGBERT: Well, I don't think
20 there were any attempts to mitigate the leak.

21 BY MR. GRUEN:

22 Q. Maybe I should -- Maybe I should -- I stand
23 corrected. Thank you. Maybe I should use the term
24 "stop the leak."

25 WITNESS EGBERT: I don't think anybody,

1 prior to the well kill, was trying to stop the leak.

2 BY MR. GRUEN:

3 Q. Okay.

4 WITNESS EGBERT: We . . . Other than the
5 energizing of the wellhead seals.

6 BY MR. GRUEN:

7 Q. Yes, sir.

8 WITNESS EGBERT: One theory that was
9 floated was that one of the seals was passing gas, and
10 Cameron was called out in order to make that
11 determination whether or not the seals were passing.

12 BY MR. GRUEN:

13 Q. Yes, sir.

14 WITNESS EGBERT: That -- That's the only
15 attempt to mitigate or stop the leak that occurred
16 prior to the well kill, to my knowledge.

17 MR. GRUEN: Understood. Thank you.

18 Anyone else?

19 Okay. Thank you both very much.

20 You are -- You were required to answer our
21 questions, but we appreciate your -- your time and
22 effort and insight in helping with our pre-formal
23 investigation. So we appreciate that. We appreciate
24 you coming here.

25 And, with that, that concludes the Examination

1 Under Oath for today and you're both excused.

2 WITNESS EGBERT: Terrific. Thank you.

3 WITNESS NEVILLE: Thank you.

4 MR. GRUEN: Off the record.

5 (Proceedings adjourned at 4:08 p.m.)

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1 State of California)
2 County of San Francisco)

3

4 I, Candace L. Yount, Certified Shorthand Reporter
5 for the State of California, County of San Francisco,
6 do hereby certify:

7 That I was present at the time of the above
8 proceedings;

9 That I took down in machine shorthand notes all
10 proceedings had and testimony given;

11 That I thereafter transcribed said shorthand notes
12 with the aid of a computer;

13 That the above and foregoing is a full, true, and
14 correct transcription of said shorthand notes, and a
15 full, true and correct transcript of all proceedings
16 had and testimony taken;

17 That I am not a party to the action or related to
18 a party or counsel;

19 That I have no financial or other interest in the
20 outcome of the action.

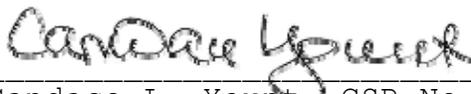
21

22 Dated: November 18, 2018

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Candace L. Yount, CSR No. 2737



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