SED-261
Neville and Egbert Examination Under Oath, Nov. 9, 2018
I.19-06-016
ALJs: Hecht/Poirier
Date Served: April 30, 2021

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

ATKINSON-BAKER, INC.
(800) 288-3376
www.depo.com

REPORTED BY: CANDACE YOUNT, CSR NO. 2737

FILE NO. AC0B81D

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 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.

A P P E A R A N C E S

REPRESENTING THE Public Utilities Commission of the State of California:

CALIFORNIA PUBLIC UTILITIES COMMISSION
DARRYL J. GRUEN, ESQ.
Safety and Enforcement Division
NICHOLAS SHER, ESQ.
Safety and Enforcement Division
MARIA SOLIS
Senior Utilities Engineer
Safety and Enforcement Division
RANDY HOLTER
Senior Utilities Specialist
Safety and Enforcement Division
JULIETTA ROSE
Law Clerk/Legal Division
505 Van Ness Avenue
San Francisco, California 94102

FOR SOUTHERN CALIFORNIA GAS COMPANY:

MORGAN, LEWIS & BOCKIUS LLP
F. JACKSON STODDARD, ESQ.
One Market
Spear Street Tower
San Francisco, California 94105-1596

Southern California Gas Company
General Counsel
SABINA CLORFEINE, Esq.
555 W. 5th Street
Los Angeles, California 90013

I N D E X

I N D E X (Continued)

E X H I B I T S

PAGES MARKED CONFIDENTIAL

65 through 75
122 through 154
192 through 199

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

---000---

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

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

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

And why don't we start this way.

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

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

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

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

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

MS. CLORFEINE: Sabina Clorfeine, counsel for SoCalGas.

WITNESS NEVILLE: Dan Neville, Resident Engineering for SoCalGas.

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

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

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

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

I believe . . .

THE COURT REPORTER: I need to swear them in.

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

THE COURT REPORTER: Will both of you

raise your right hands.

DAN NEVILLE and TOM EGBERT,
having affirmed under penalty
of perjury to tell the truth, were
examined and testified as follows:

EXAMINATION

BY MR. GRUEN:

Q. Okay. So, I was mentioning this is like a deposition except that there's no underlying proceeding. If there was an underlying proceeding, then this for all intents and purposes would be a deposition.

We do not know where we are going to go with the information we learn today, whether -- that is to say, whether this will become a full-blown Commission investigation or not. It's possible that it won't as well. This is simply preliminarily -- We're still at our fact-gathering stage.

Do you understand? Do you both understand what I've said?

WITNESS EGBERT: Yes.

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

Do you understand that?

WITNESS EGBERT: Yes.

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

Do you understand that?

WITNESS EGBERT: Yes.

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

WITNESS EGBERT: Yes.

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

Q. Okay. Thank you.

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

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

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

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

Do you understand that?

WITNESS EGBERT: Yes.

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

Q. Thank you.

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

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

WITNESS EGBERT: Yes.

WITNESS NEVILLE: Yes.

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

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

MR. GRUEN: Thank you.

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

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

BY MR. GRUEN:

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

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

(Reading):

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

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

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

WITNESS EGBERT: No.

WITNESS NEVILLE: No.

BY MR. GRUEN:

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

WITNESS EGBERT: No.

WITNESS NEVILLE: No.

BY MR. GRUEN:

Q. Okay. Thank you.

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

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

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

BY MR. GRUEN:

Q. Okay. Mr. Egbert.

WITNESS EGBERT: Just immediate Supervisor and counsel.

BY MR. GRUEN:

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

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

MR. GRUEN: Okay.

BY MR. GRUEN:

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

WITNESS EGBERT: No.

BY MR. GRUEN:

Q. -- in preparation for today.

WITNESS NEVILLE: No.

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

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

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

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

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

So --

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

you begin that --

MR. GRUEN: Sure.

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

MR. GRUEN: Yeah.

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

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

MR. GRUEN: Absolutely.

MR. STODDARD: -- regarding counsel?

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

MR. STODDARD: Thank you.

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

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

MR. GRUEN: Understood.

MR. STODDARD: Thank you.

BY MR. GRUEN:

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

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

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

(Pause in proceedings.)

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

BY MR. GRUEN:

Q. Okay. Thank you.

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

WITNESS EGBERT: In relation to gas storage wells only?

BY MR. GRUEN:

Q. Yes, please.

WITNESS EGBERT: So, in the context of

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

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

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

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

BY MR. GRUEN:

Q. Okay. Thank you.

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

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

BY MR. GRUEN:

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

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

since, so that timeframe.

BY MR. GRUEN:

Q. Thank you.

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

WITNESS EGBERT: No.

BY MR. GRUEN:

Q. Thank you.

(Pause in proceedings.)

THE WITNESS: Could you rephrase that question?

BY MR. GRUEN:

Q. Sure.

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

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

BY MR. GRUEN:

Q. Okay.

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

processes.

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

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

WITNESS EGBERT: They ranged from years 2005 to 2013.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

WITNESS EGBERT: I was a Transmission Pipeline Assessment Manager.

BY MR. GRUEN:

Q. And what was your role?

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

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: I should say pipeline integrity assessments.

BY MR. GRUEN:

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

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

WITNESS EGBERT: (Nodding head.)

BY MR. GRUEN:

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

WITNESS EGBERT: Transmission pipeline integrity --

BY MR. GRUEN:
Q. Okay.
WITNESS EGBERT: -- projects.
BY MR. GRUEN:
Q. Okay. Understood. Not storage integrity or well integrity management types of projects?
WITNESS EGBERT: No.
BY MR. GRUEN:
Q. Understood.
Okay. Can you, again at a high level, elaborate on, when you mentioned the surface processes for the Transmission Group what your role was in -- in doing that work.
WITNESS EGBERT: It was focused on internal corrosion assessment of transmission pipelines within gas storage fields.
BY MR. GRUEN:
Q. Okay. And internal corrosion assessment, was that for things at the surface or was that down -- down well as -- as well?
WITNESS EGBERT: Surface only.
BY MR. GRUEN:
Q. Understood. Thank you.
Did that include work at Aliso Canyon?
WITNESS EGBERT: Yes.

BY MR. GRUEN:

Q. Okay. Understood.

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

WITNESS EGBERT: Yes.

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

BY MR. GRUEN:

Q. Okay.

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

MR. GRUEN: Thank you.

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

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

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

MR. GRUEN: Okay. Back on the record.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay. Great. Okay. Thank you.

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

WITNESS EGBERT: Can you rephrase that --

BY MR. GRUEN:

Q. Sure.

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

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

WITNESS EGBERT: Yes.

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Understood.

WITNESS EGBERT: -- on the surface.
BY MR. GRUEN:
Q. Okay.
WITNESS EGBERT: I don't know if that answered your question.
BY MR. GRUEN:
Q. It does. That's helpful.
I think -- I think -- What I'm hearing is, I think we're getting the extent of your experience, including both surface and underground working for deliverability that really qualifies you to speak about underground natural gas storage. So I think you have.
WITNESS EGBERT: (Nodding head.)
BY MR. GRUEN:
Q. And I'm seeing you nod. I think that's a yes.
WITNESS EGBERT: Yes.
BY MR. GRUEN:
Q. Okay.
WITNESS EGBERT: I wanted you to finish your question before I verbalized.
BY MR. GRUEN:
Q. Absolutely thank you. And thank you for the signal telling me I was on the right track.
WITNESS EGBERT: (Nodding head.)

BY MR. GRUEN:

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

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

WITNESS NEVILLE: (Nodding head.)

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

WITNESS NEVILLE: (Nodding head.)

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

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

The initial role in 2013 to 2014 was Reservoir

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

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

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

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

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

BY MR. GRUEN:

Q. Thanks.

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

Reservoir Engineering Manager?

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

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

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

have qualified me.

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

BY MR. GRUEN:

Q. Yeah, if --

WITNESS NEVILLE: Okay.

BY MR. GRUEN:

Q. -- you could elaborate.

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

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

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

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

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

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

BY MR. GRUEN:

Q. Understood.

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

Was -- Was that at Aliso specifically?

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

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

sure we had the Wells optimized and properly choked.

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

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

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

BY MR. GRUEN:

Q. Thank you.

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

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

BY MR. GRUEN:

Q. Please.

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

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

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

BY MR. GRUEN:

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

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

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

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

BY MR. GRUEN:

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

WITNESS NEVILLE: Correct.

BY MR. GRUEN:

Q. I follow. Thank you.

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

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

BY MR. GRUEN:

Q. Yeah. Okay.

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

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

Is that an accurate way to characterize it?

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

BY MR. GRUEN:

Q. Please.

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

Q. Thank you.

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Yes. Thank you.

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

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

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

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

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

BY MR. GRUEN:

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

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

WITNESS NEVILLE: How far down?

BY MR. GRUEN:

Q. At what depth from the surface?

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

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

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

BY MR. GRUEN:

Q. Yes.

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

It's the production casing --
BY MR. GRUEN:
Q. Thank you --
WITNESS NEVILLE: -- that we're interested in.
BY MR. GRUEN:
Q. -- for the clarification. I follow. Yes. Okay.
WITNESS NEVILLE: And so the pressure is -- is a pressure that's recorded at the surface.
BY MR. GRUEN:
Q. Okay.
WITNESS NEVILLE: So there's no depth measurement with that read.
BY MR. GRUEN:
Q. Okay.
WITNESS NEVILLE: One would need to -- to follow up with a Temperature Survey to find the depth.
BY MR. GRUEN:
Q. All right. I see.
So is it that the pressure read at the surface is telling whether there's a leak in the well?
WITNESS NEVILLE: The pressure read could be an indication, yes, that there would be a -- could be a leak in the well.

BY MR. GRUEN:

Q. That there could be a leak.

WITNESS NEVILLE: Yeah.

Q. It's an indication. I follow.

Okay. Thank you.

MS. ROSE: Can I ask?

MR. GRUEN: Absolutely.

EXAMINATION

BY MS. ROSE:

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

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

BY MS. ROSE:

Q. Okay.

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

BY MS. ROSE:

Q. Um-hmm.

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

BY MS. ROSE:

Q. Um-hmm.

EXAMINATION (RESUMED)

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Yeah.

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

MR. GRUEN: Okay. Thank you.

Thank you both. Appreciate that.

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

MS. CLORFEINE: That would be great.

MR. GRUEN: -- take a break?

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

Let's go off the record.

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

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

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

BY MR. GRUEN:

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

Do you recall that?

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

Did I understand that right?

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

BY MR. GRUEN:

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

And, so, when was the Temperature Survey for

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

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

BY MR. GRUEN:

Q. Okay.

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

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

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

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

BY MR. GRUEN:

Q. Understood.

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

Am I following that right?

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Please. That's helpful.

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

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

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

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

BY MR. GRUEN:

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

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

WITNESS NEVILLE: (Nodding head.)

BY MR. GRUEN:

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

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

MR. GRUEN: Okay. Thank you.

EXAMINATION

BY MS. SOLIS:

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

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

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

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

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

BY MS. SOLIS:

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

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

(Pause in proceedings.)

EXAMINATION (RESUMED)

BY MR. GRUEN:

Q. How -- How . . .

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

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

BY MR. GRUEN:

Q. Understood. Okay. Thank you.

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

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

Could -- Could you walk us through day by day

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

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

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

BY MR. GRUEN:

Q. May --

WITNESS NEVILLE: -- when?

BY MR. GRUEN:

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

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

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

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay. That's a short answer.

(Laughter.)

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Okay.

WITNESS NEVILLE: -- to the team.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

Q. Yes.

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

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

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Yes.

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Alan Fortenberry?

WITNESS EGBERT: Alan Fortenberry. Sorry.

BY MR. GRUEN:

Q. No. I was clarifying.

Okay. Thank you.

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

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

WITNESS EGBERT: Yes.

BY MR. GRUEN:

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

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

WITNESS EGBERT: (Nodding head.)

BY MR. GRUEN:

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

WITNESS EGBERT: Okay. So your question is?

BY MR. GRUEN:

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

WITNESS EGBERT: Yes.

BY MR. GRUEN:

Q. Okay. Can you explain what you observed.

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

BY MR. GRUEN:

Q. Yes.

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

BY MR. GRUEN:

Q. I follow. Thank you.

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

Q. Understood. Thank you.

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

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

BY MR. GRUEN:

Q. Yes, sir.

WITNESS EGBERT: At that time.
BY MR. GRUEN:
Q. At that time.
WITNESS EGBERT: I wasn't sure.
BY MR. GRUEN:
Q. Okay.
WITNESS EGBERT: I wasn't sure what -- Something had changed. I didn't view it as a positive change. And I thought that shutting down the pump equipment was the right thing to do.
BY MR. GRUEN:
Q. Okay. I'm gleaning that, since -- since you were working with Alan Fortenberry, that you had spoken with him at some point in time, perhaps either -- When did you first speak with him?
WITNESS EGBERT: Well, before, during and after the well kill attempts. He communicated to me very clearly that a well kill was going to be attempted prior to the equipment being mobilized.
We worked all night to get the vendors there, the equipment there, to get it mobilized and everything connected. I assisted in those logistics, and Alan Fortenberry and I collaborated on that effort.
And, then, once the -- So -- Yeah. So, during that time frame, we communicated quite a bit.

BY MR. GRUEN:

Q. Understood. Okay.

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

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

BY MR. GRUEN:

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

WITNESS EGBERT: No.

BY MR. GRUEN:

Q. Okay. And same question for the casing.

WITNESS EGBERT: No.

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: No, I didn't.

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

Q. Understood. Thank you.

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

I think I understood. Is that right?

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

What was discussed in the meeting that you attended?

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

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

BY MR. GRUEN:

Q. Okay. Thank you.

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

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

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

BY MR. GRUEN:

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

WITNESS EGBERT: (Nodding head.)

BY MR. GRUEN:

Q. And --

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

WITNESS EGBERT: I would say no.

BY MR. GRUEN:

Q. Okay. Understood.

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Yes, please.

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

BY MR. GRUEN:

Q. Okay.

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

(Pause in proceedings.)

THE WITNESS: Let's see who else.

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

BY MR. GRUEN:

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

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

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

WITNESS EGBERT: In my case, no.

BY MR. GRUEN:

Q. Okay. Thank you.

Mr. Neville?

WITNESS NEVILLE: No.

BY MR. GRUEN:

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

(Pause in proceedings.)

BY MR. GRUEN:

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

WITNESS EGBERT: (Nodding head.)

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: Not specifically, no.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Understood. Okay. Okay.

(Pause in proceedings.)

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Yes.

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

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

BY MR. GRUEN:

Q. Understood. Okay.

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

BY MR. GRUEN:

Q. And have you since learned?

WITNESS EGBERT: No, no --

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

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

(Pause in proceedings.)

MR. GRUEN: 11:41.

(Pause in proceedings.)

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

(Whereupon, a discussion was held off the record commencing at 11:42 a.m.)

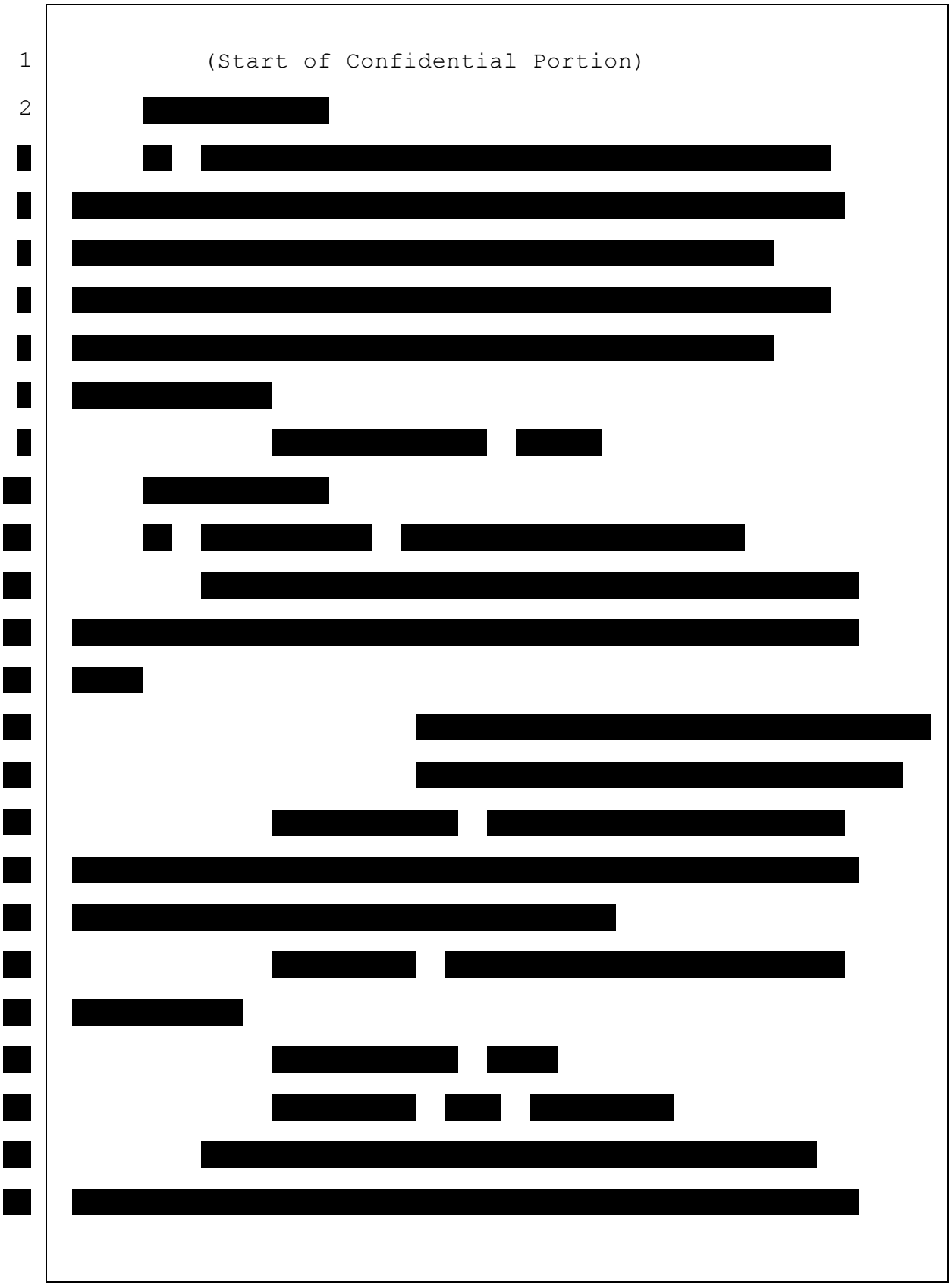
(Proceedings resumed at 11:46 a.m.:)

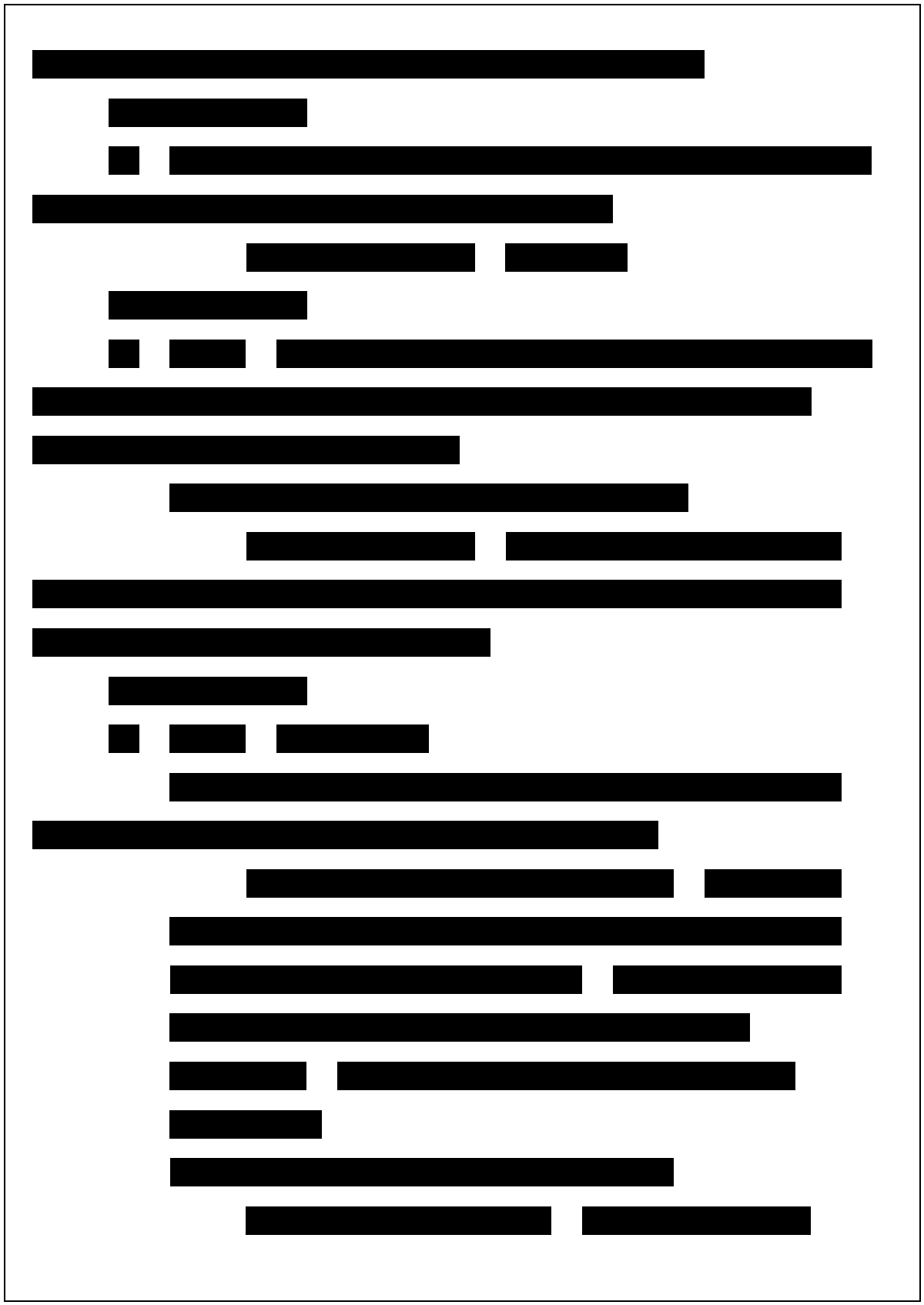
MR. GRUEN: Let's go back on the record. And if we could -- For this portion, if we could go under seal.

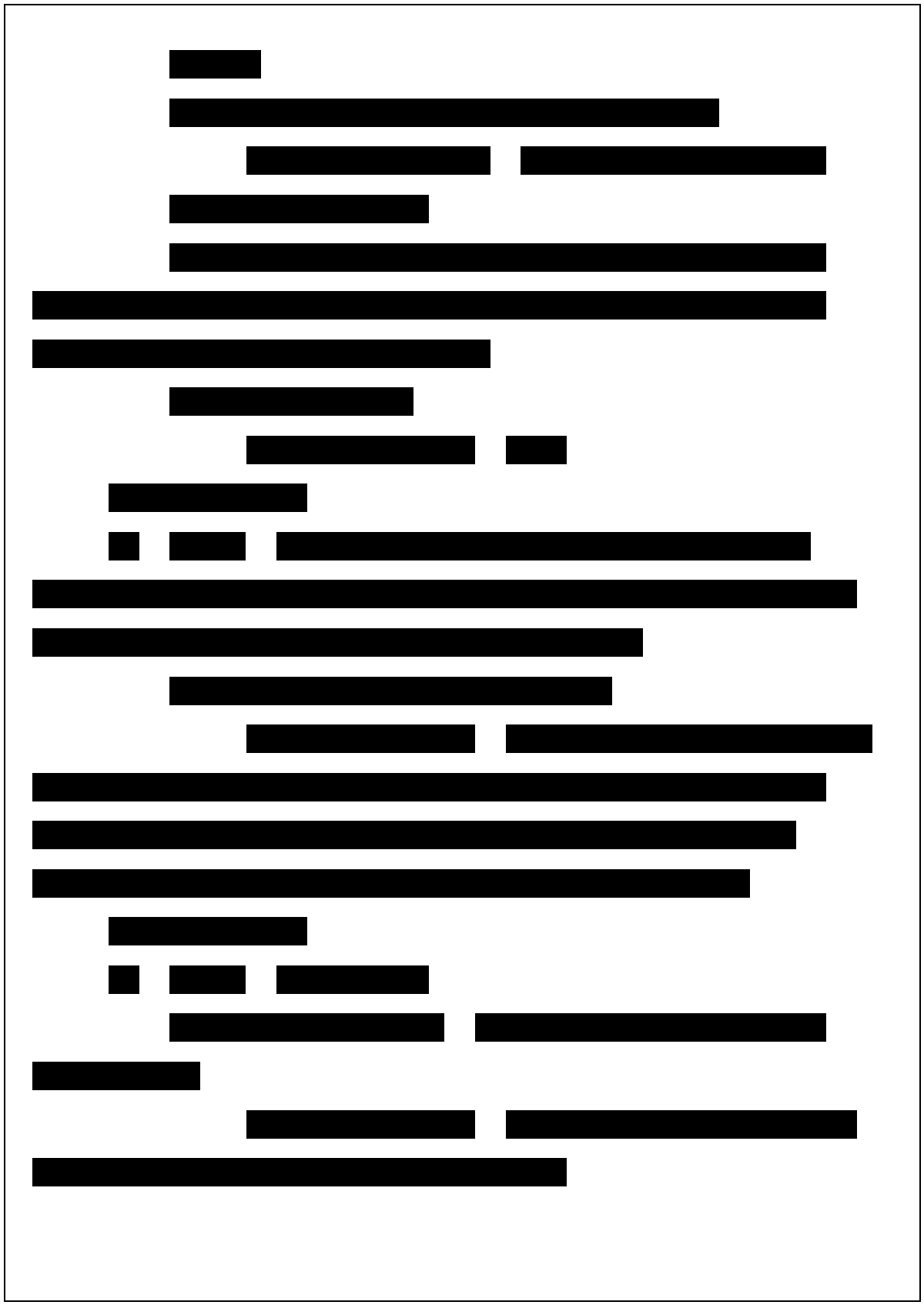
(The following pages 65 through 75 are confidential.)

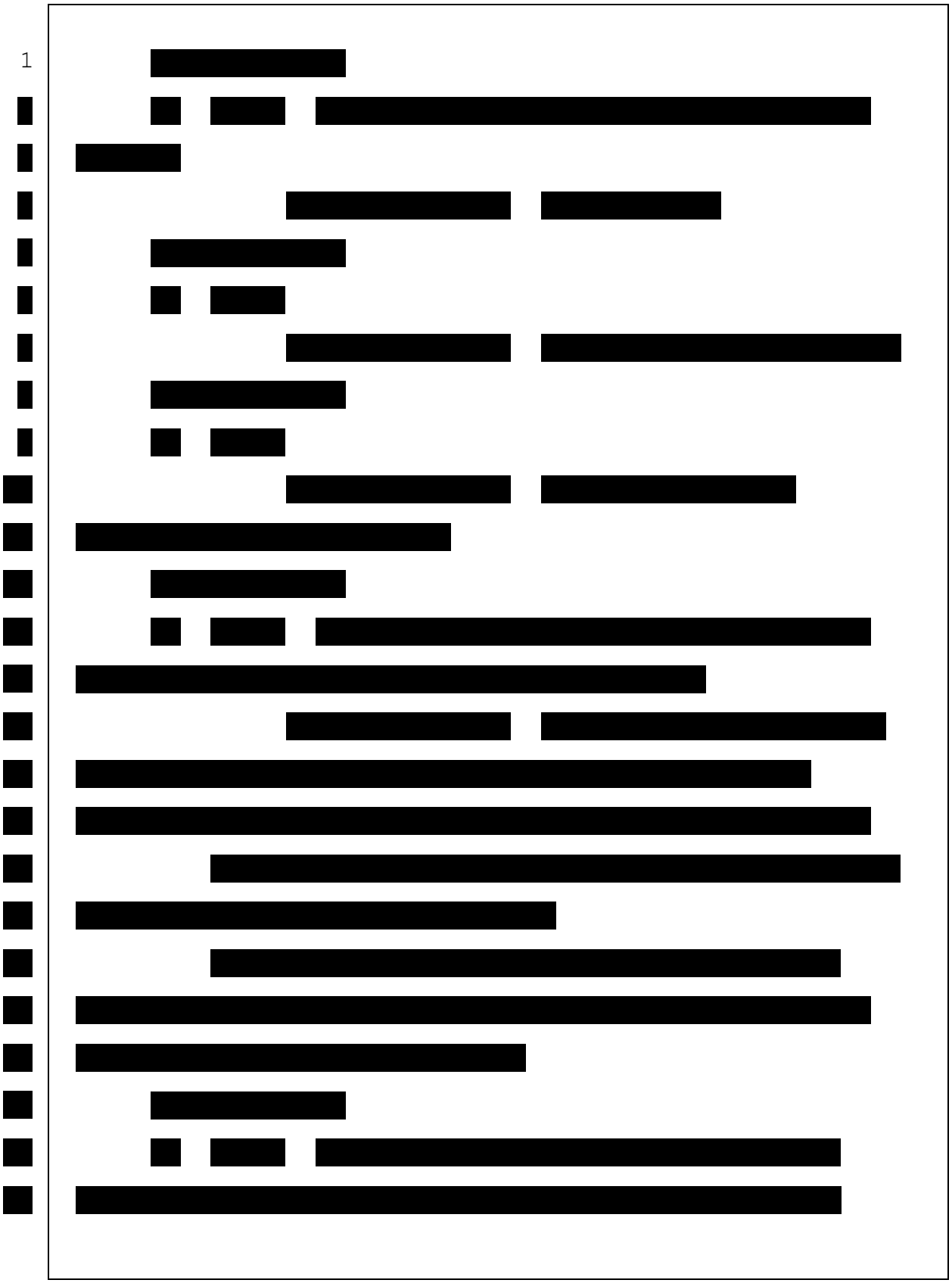
///

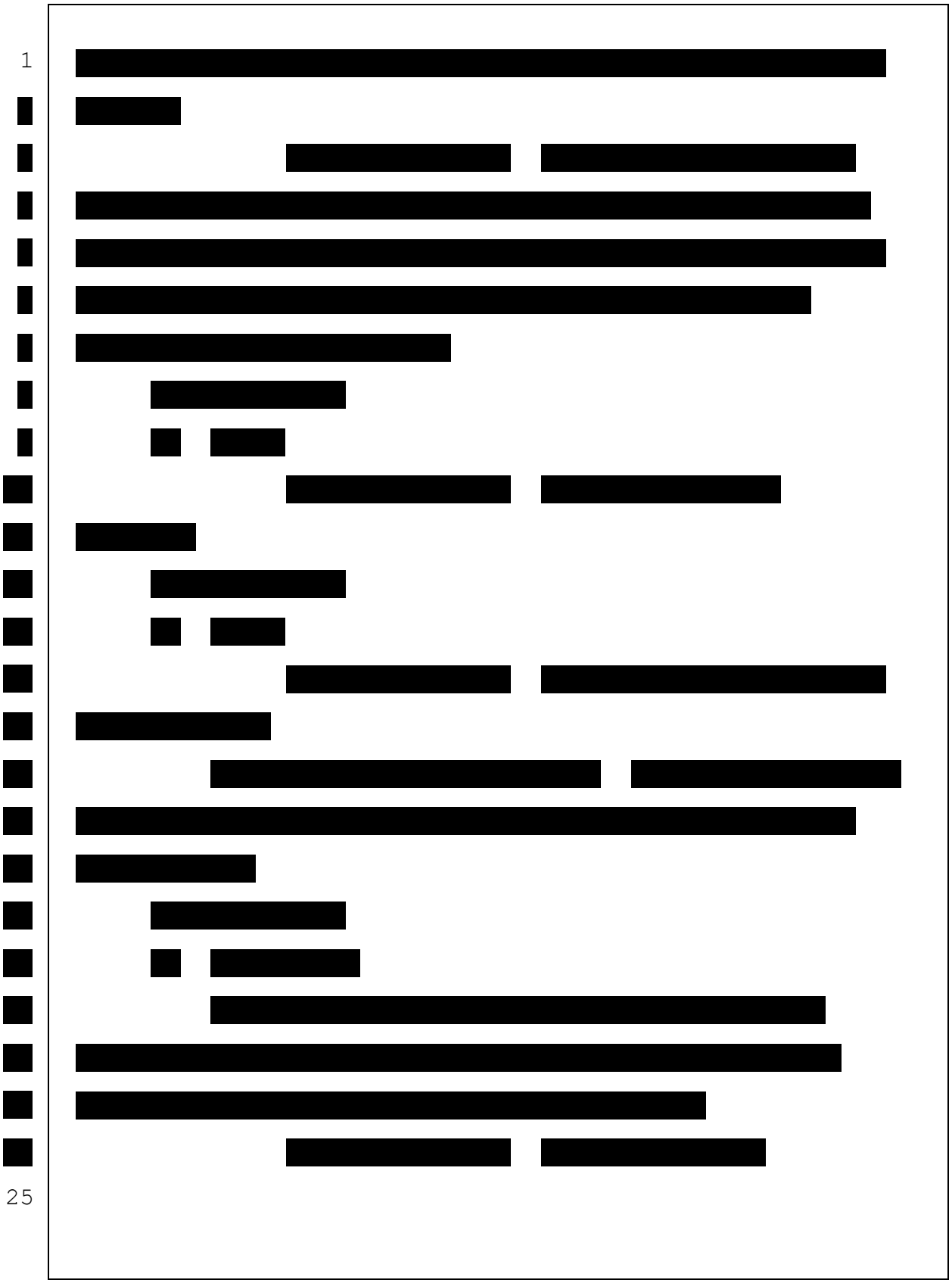
(Start of Confidential Portion)

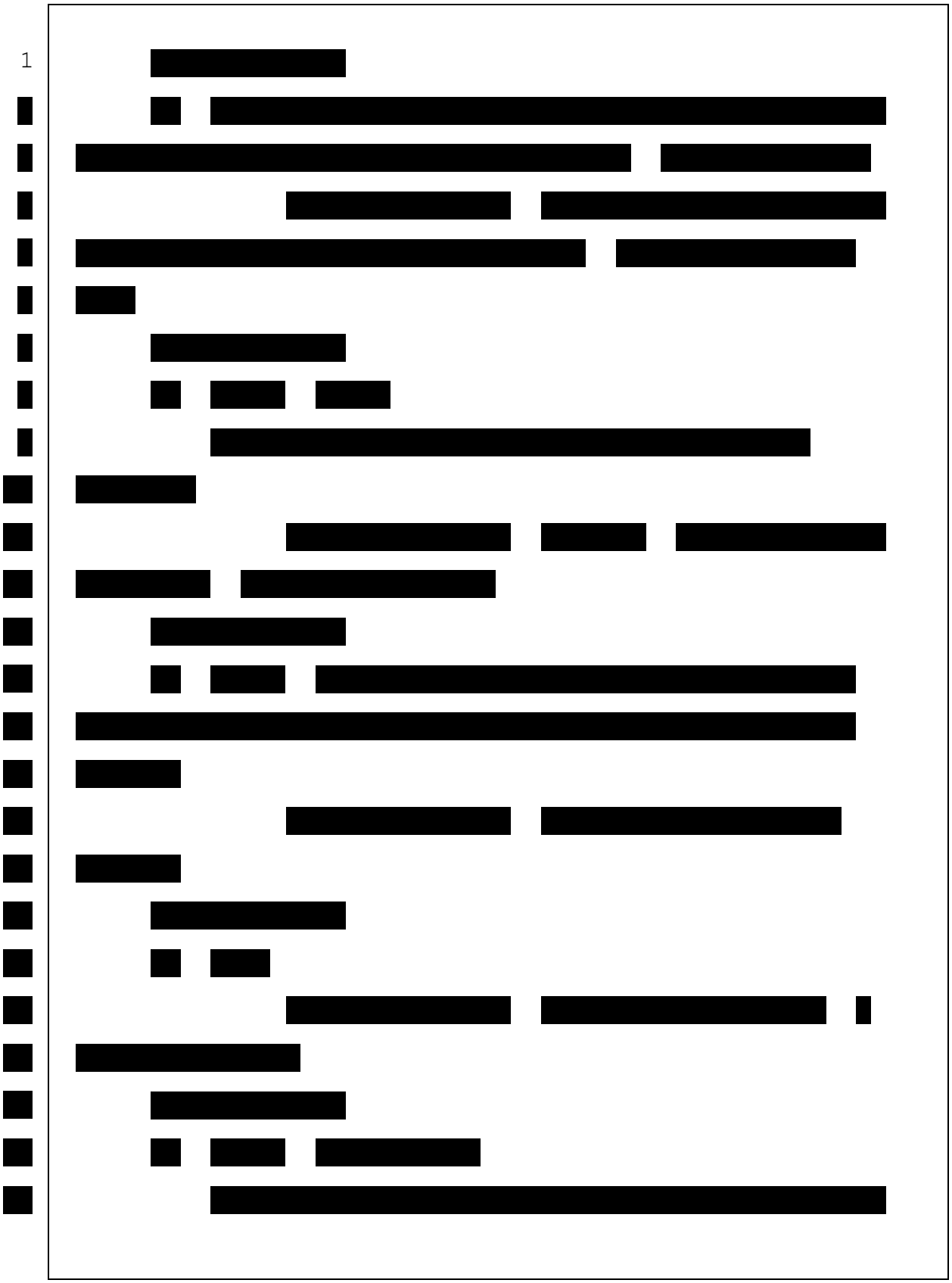


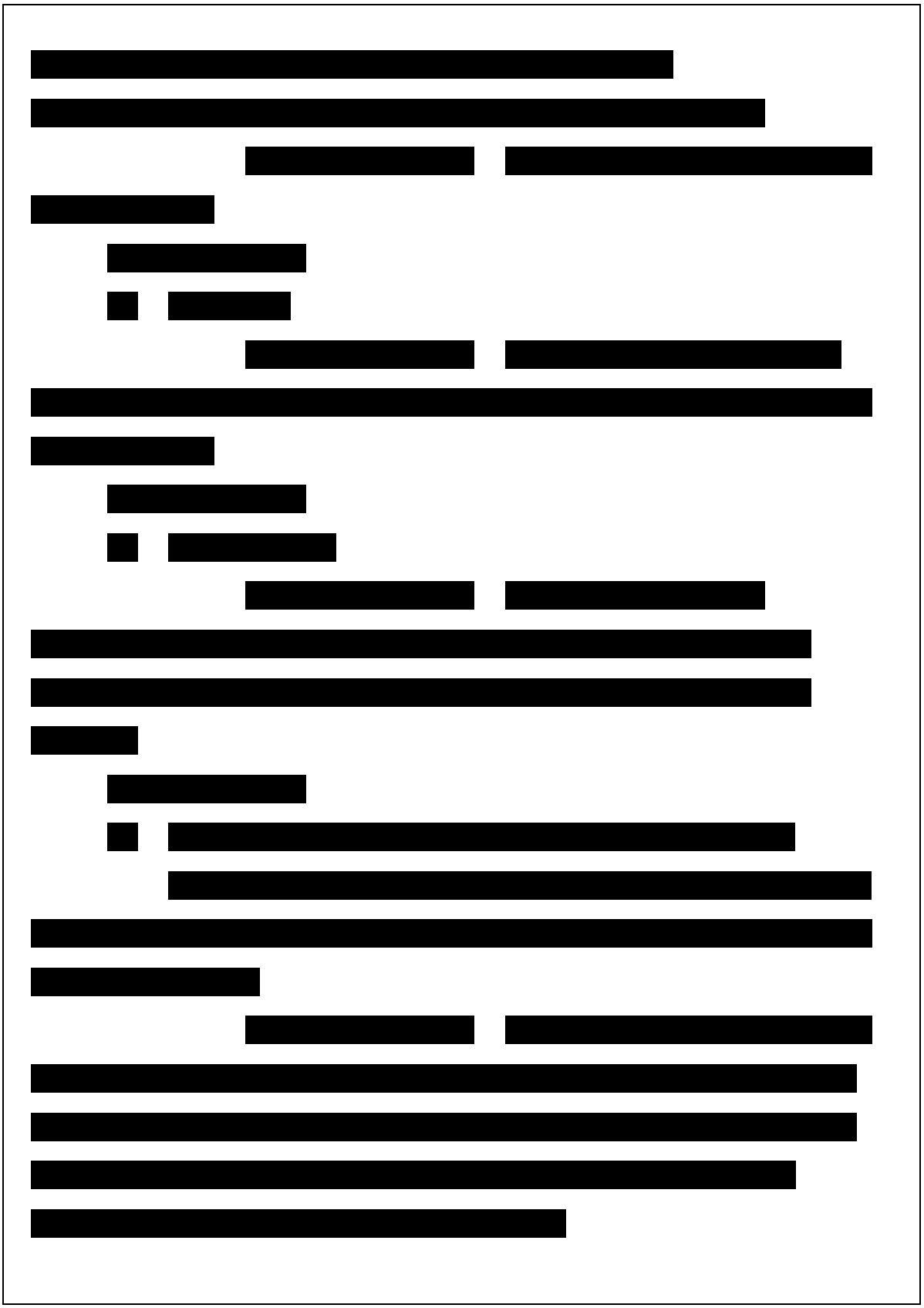


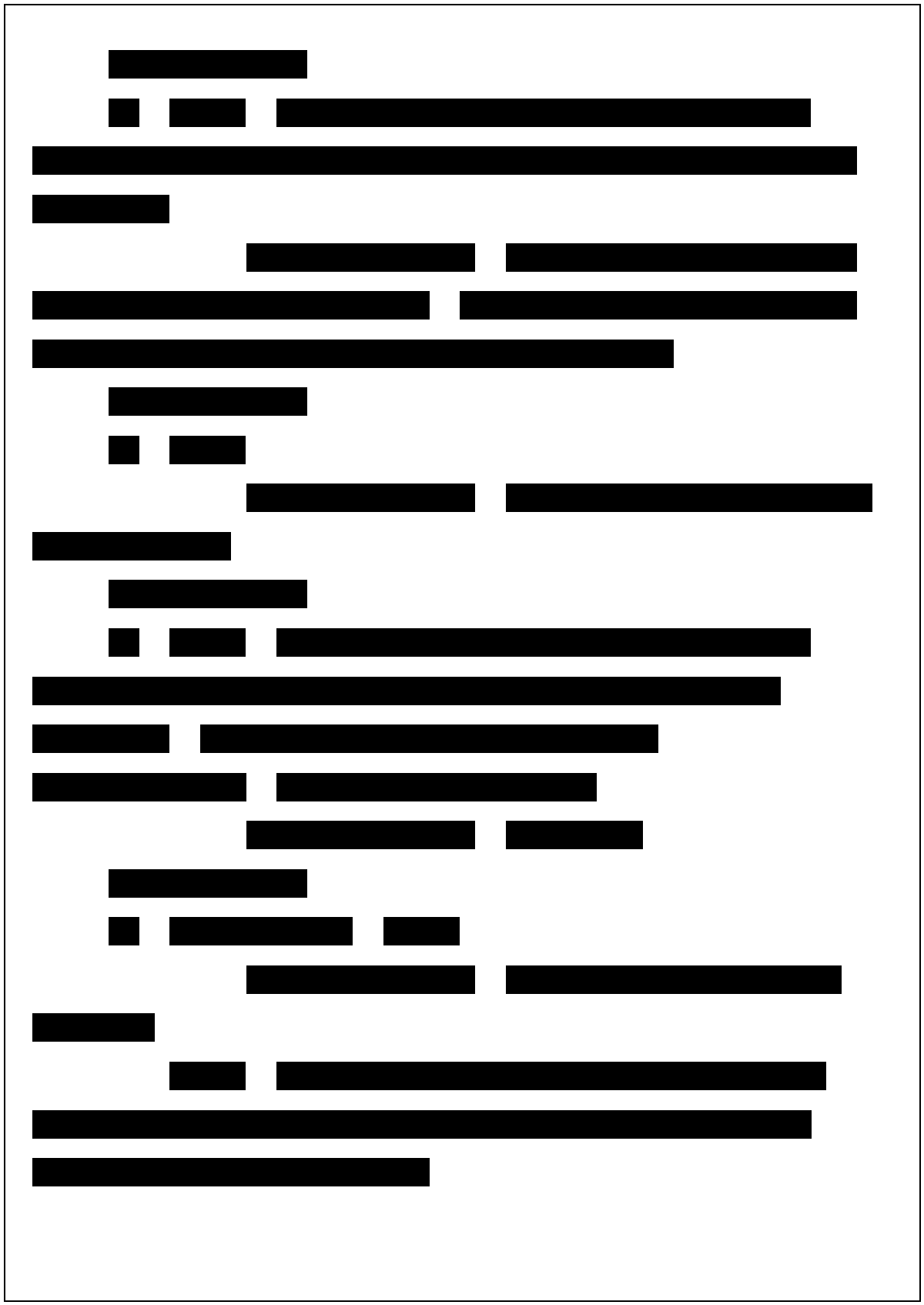


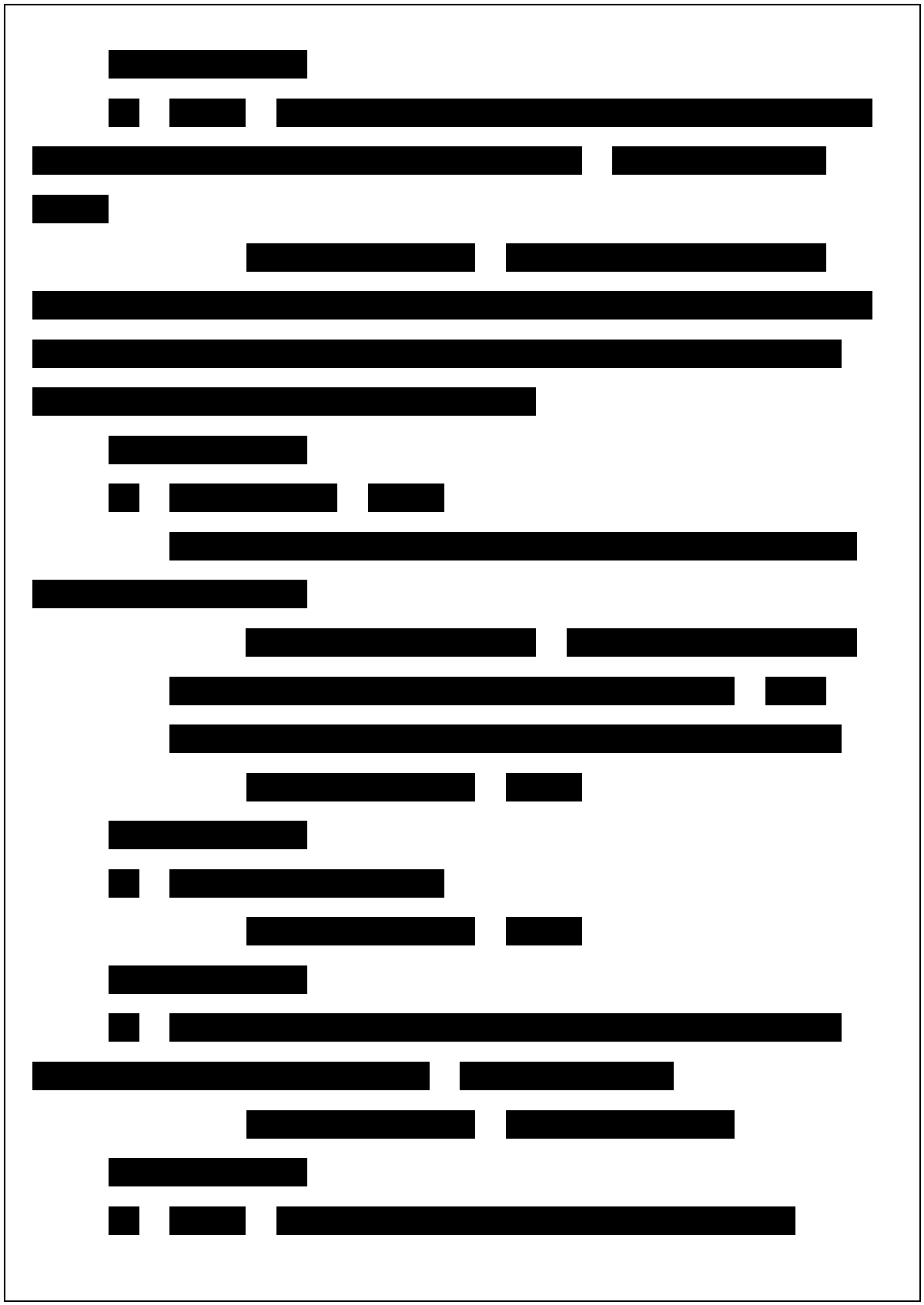


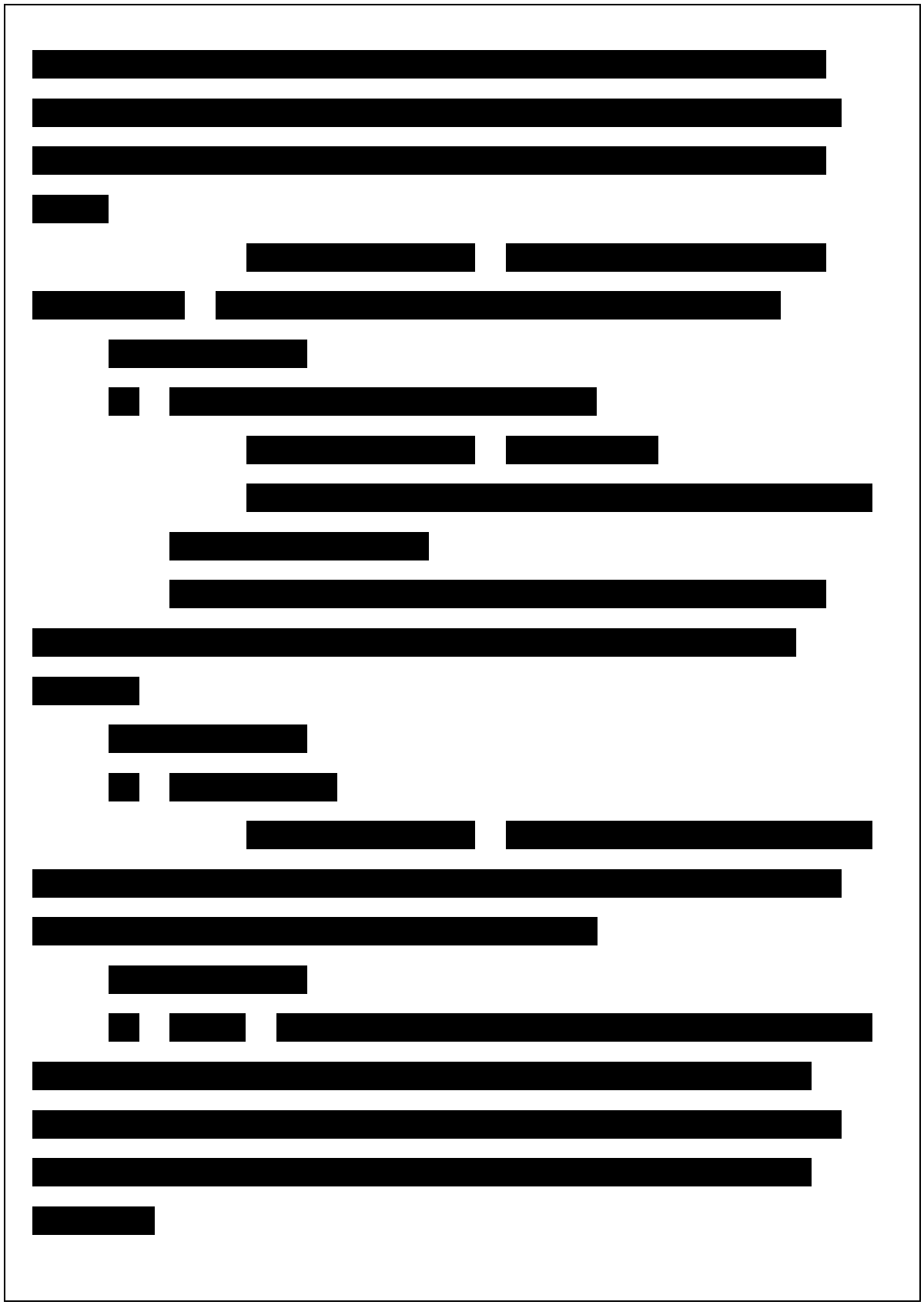












[redacted]

(End of Confidential Portion)

///

(Continuation of Non-Confidential Testimony)

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

MS. CLORFEINE: Are we on the record still?

MR. GRUEN: Yes, we are.

Let's go off the record.

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

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

* * *

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

---000---

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

BY MR. GRUEN:

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

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

Did I understand that right?

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

BY MR. GRUEN:

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

Did I get that right as well?

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

BY MR. GRUEN:

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

WITNESS NEVILLE: No.

BY MR. GRUEN:

Q. Okay.

WITNESS NEVILLE: Not that I recall,

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

BY RIGHT1:

Q. What --

WITNESS NEVILLE: -- response in the well kill.

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. What were they about?

WITNESS NEVILLE: So DOGGR's --

BY MR. GRUEN:

Q. At a high level, please.

WITNESS NEVILLE: A high level?

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

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

BY MR. GRUEN:

Q. Not SS-25.

WITNESS NEVILLE: No.

BY MR. GRUEN:

Q. Okay. Any others?

WITNESS NEVILLE: So the CPUC?

BY MR. GRUEN:

Q. Please.

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

BY MR. GRUEN:

Q. Sure.

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

BY MR. GRUEN:

Q. Again, not SS-25?

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

BY MR. GRUEN:

Q. Uh-huh.

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

BY MR. GRUEN:

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

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

Q. Okay. Understood.

WITNESS NEVILLE: Yeah.

BY MR. GRUEN:

Q. And OSHA?

WITNESS NEVILLE: OSHA had requested some information, too.

BY MR. GRUEN:

Q. Okay. Related to SS-25?

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

Q. Can you say more?

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

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

BY MR. GRUEN:

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

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

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

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

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

(Whereupon, a discussion was held off the record commencing at 1:11 PM)

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

MR. GRUEN: Back on the record, please.

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

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

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

Am I getting that right? Or I --

MR. STODDARD: No.

MR. GRUEN: -- look for clarification.

Okay.

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

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

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

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

MR. GRUEN: Okay.

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

Anyhow, so we can proceed.

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

BY MR. GRUEN:

Q. So let me try and restate the question,

Mr. Neville.

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

Did I get that right?

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

MR. GRUEN: Okay.

MR. STODDARD: You -- Yeah.

MR. GRUEN: Okay.

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

MR. GRUEN: Indeed it is.

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

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

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

BY MR. GRUEN:

Q. Yes.

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

(Pause in proceedings.)

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

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

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay.

WITNESS NEVILLE: And . . .

BY MR. GRUEN:

Q. What are --

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

BY MR. GRUEN:

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

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

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

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

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

(Pause in proceedings.)

BY MR. GRUEN:

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

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

WITNESS NEVILLE: So, regarding SS-25.

BY MR. GRUEN:

Q. Yes, sir.

(Pause in proceedings.)

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

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

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

BY MR. GRUEN:

Q. Okay. But you --

WITNESS NEVILLE: So --

BY MR. GRUEN:

Q. Go ahead.

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

BY MR. GRUEN:

Q. Okay.

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

WITNESS NEVILLE: Yeah.

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

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

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

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

Am I getting that right?

WITNESS NEVILLE: That's correct.

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

BY MR. GRUEN:

Q. Okay.

(Pause in proceedings.)

BY MR. GRUEN:

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

WITNESS NEVILLE: That's correct.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Yeah.

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

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

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

WITNESS NEVILLE: In general or with --

BY MR. GRUEN:

Q. Specifical to Well SS-25 and the Well File.

WITNESS NEVILLE: Specific to SS-25.

BY MR. GRUEN:

Q. Yes.

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

THE WITNESS: I've got --

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

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

WITNESS NEVILLE: It does.

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

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

BY MR. GRUEN:

Q. You can't answer the question?

WITNESS NEVILLE: No.

MR. GRUEN: Okay.

EXAMINATION

BY MR. SHER:

Q. Just to make sure, if I may.

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

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

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

So they have this expertise that -- and this

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

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

BY MR. SHER:

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

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

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

BY MR. SHER:

Q. Let me ask it this way:

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

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

BY MR. SHER:

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

WITNESS NEVILLE: (Shaking head.)

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

BY MR. SHER:

Q. To try and attempt to stop the leak.

WITNESS NEVILLE: Well . . .

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

BY MR. SHER:

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

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

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

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

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

BY MR. SHER:

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

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

BY MR. SHER:

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

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

BY MR. SHER:

Q. And that would be around October 26th?

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

BY MR. SHER:

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

WITNESS NEVILLE: No.

BY MR. SHER:

Q. Were you surprised at not being asked?

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

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

And I wasn't asked, so . . .

BY MR. SHER:

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

WITNESS NEVILLE: I would say that's correct.

BY MR. SHER:

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

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

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

BY MR. SHER:

Q. Right.

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

BY MR. SHER:

Q. Who --

WITNESS NEVILLE: -- yes.

BY MR. SHER:

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

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

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

BY MR. SHER:

Q. I appreciate that.

So . . . with regards to storage field engineering.

WITNESS NEVILLE: Um-hmm.

BY MR. SHER:

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

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

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

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

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

BY MR. SHER:

Q. And that person's name is?

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

BY MR. SHER:

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

WITNESS NEVILLE: That's correct.

BY MR. SHER:

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

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

BY MR. SHER:

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

MR. GRUEN: End of February.

BY MR. SHER:

Q. -- end of February 2016.

WITNESS NEVILLE: The end of October 22nd?

BY MR. SHER:

Q. 2015.

WITNESS NEVILLE: 2015.

BY MR. SHER:

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

WITNESS NEVILLE: Well files.

BY MR. SHER:

Q. -- were accurate and correct?

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

BY MR. SHER:

Q. Do you know if they were complete?

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

MR. GRUEN: Okay.

MR. SHER: Thank you.

WITNESS NEVILLE: Okay.

EXAMINATION (RESUMED)

BY MR. GRUEN:

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

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay. And how would . . .

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

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Okay.

WITNESS NEVILLE: He mentioned shifting a sliding sleeve.

BY MR. GRUEN:

Q. Yeah.

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

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

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

BY MR. GRUEN:

Q. Okay. Thank you.

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

WITNESS NEVILLE: October 23rd?

BY MR. GRUEN:
Q. Following when --
WITNESS NEVILLE: Oh, following the --
BY MR. GRUEN:
Q. -- the incident began.
Yeah, I' -- I'm using that --
WITNESS NEVILLE: Yeah.
BY MR. GRUEN:
Q. -- just interchangeably. I could -- I could mention the incident if it's more helpful.
WITNESS NEVILLE: Oh, no.
In -- In problems? I haven't had any problems with wellbore schematics.
BY MR. GRUEN:
Q. Okay.
WITNESS NEVILLE: I do recall having . . . a third-party company come in and update our schematics that we -- that we had.
So we had -- we had some schematics that were hand-drawn and in place for -- for many, many years.
And then we had -- We were building some new schematics with Wellview. The new schematics, in my -- my mind, weren't as -- as nice as I wanted them, and especially providing them to -- to a regulator.
We were asked by DOGGR to start providing some

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

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

read.

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

BY MR. GRUEN:

Q. Why had DOGGR asked SoCalGas to provide schematics?

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

BY MR. GRUEN:

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

WITNESS NEVILLE: The --

BY MR. GRUEN:

Q. Am I following that right?

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

BY MR. GRUEN:

Q. Okay.

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

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

BY MR. GRUEN:

Q. Um-hmm.

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

BY MR. GRUEN:

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

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

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

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

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

BY MR. GRUEN:

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

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

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

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

EXAMINATION (RESUMED)

BY MS. ROSE:

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

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

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.

BY MS. ROSE:

Q. Okay.

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

BY MS. ROSE:

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

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

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

EXAMINATION (RESUMED)

BY MR. GRUEN:

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

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

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

Q. Why?

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

BY MR. GRUEN:

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

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

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

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

hand-drawn schematic.

BY MR. GRUEN:

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

WITNESS NEVILLE: They were.

BY MR. GRUEN:

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

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

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

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

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

BY MR. GRUEN:

Q. Yeah.

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

BY MR. GRUEN:

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

WITNESS NEVILLE: No.

BY MR. GRUEN:

Q. Okay.

(Pause in proceedings.)

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Had you voiced the concern that --

WITNESS NEVILLE: Yeah.

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

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

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

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

BY MR. GRUEN:

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

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

Did I get that right?

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

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

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Same question --

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

BY MR. GRUEN:

Q. Yes.

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

BY MR. GRUEN:

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

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

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

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

BY MR. GRUEN:

Q. Incomplete data.

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

BY MR. GRUEN:

Q. Yes, sir.

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

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

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

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

BY MR. GRUEN:

Q. Okay.

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Okay.

WITNESS NEVILLE: -- the presentation.

MR. GRUEN: Understood.

(Pause in proceedings.)

MR. GRUEN: Can we go under seal?

Let's go off the record for a moment.

(Whereupon, a discussion was held off the record commencing at 1:59 PM)

(Recess taken at 2:00 PM)

///

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

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

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

MS. ROSE: The e-mail from earlier.

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

MR. STODDARD: Yeah.

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

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

MR. GRUEN: It -- It --

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

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

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

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

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

Ms. Rose, would you like to identify the Bates

stamp for Exhibit 3?

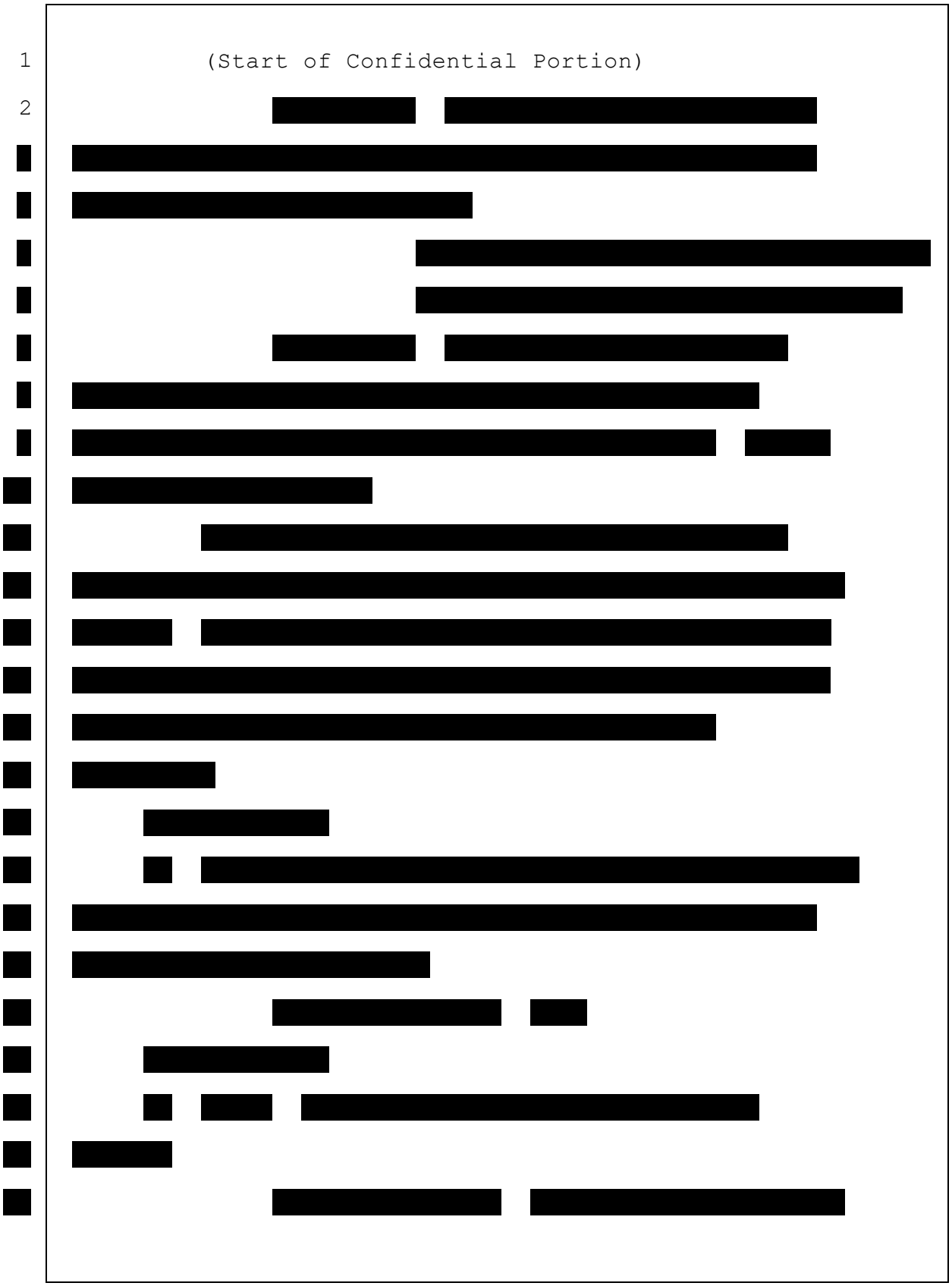
MS. ROSE: Yes. The Bates stamp for Exhibit 3 is AC_CPUC_SED_KITSON_0000946.

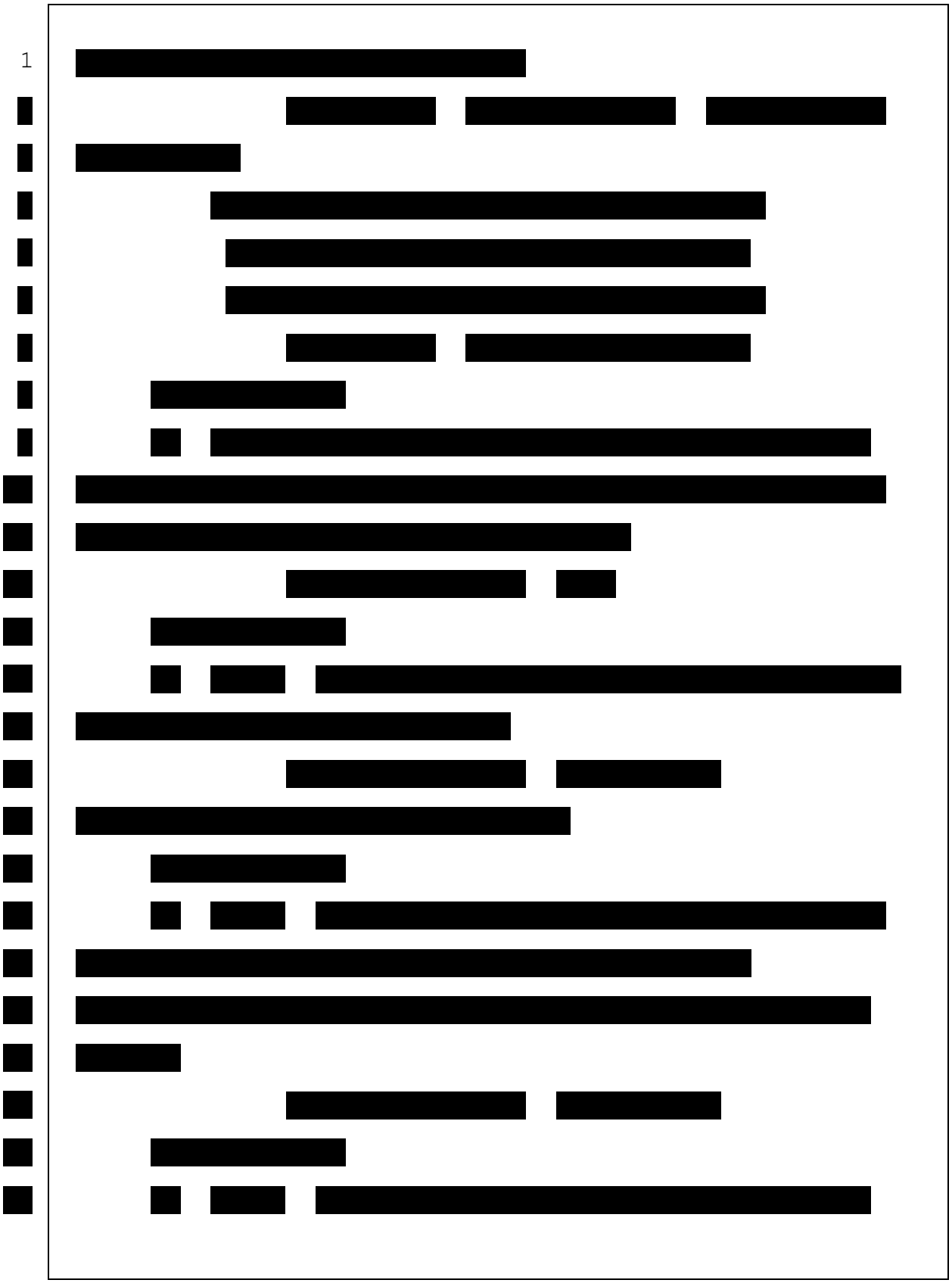
MR. GRUEN: Thank you.

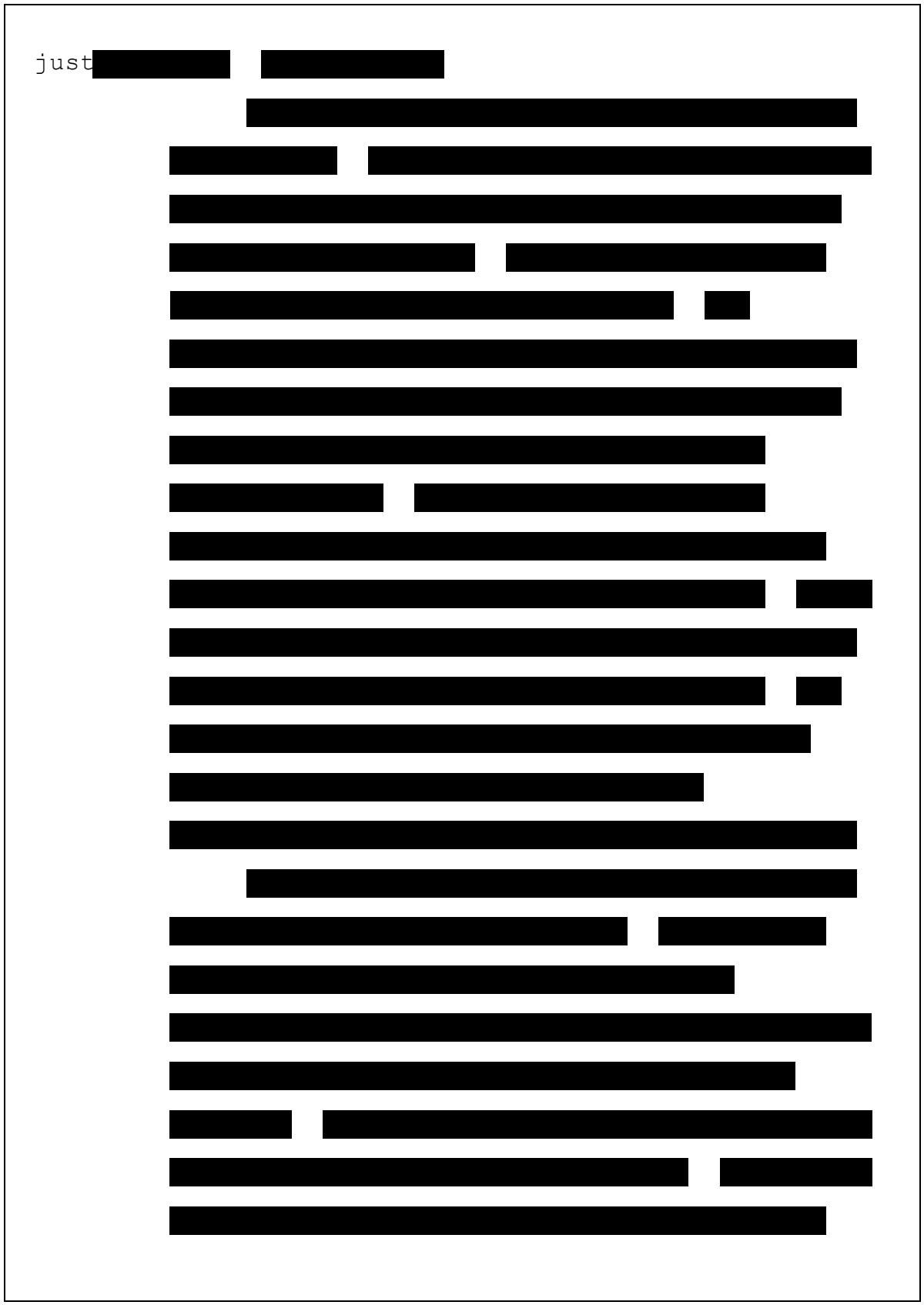
(The following pages 122 through 154 are confidential.)

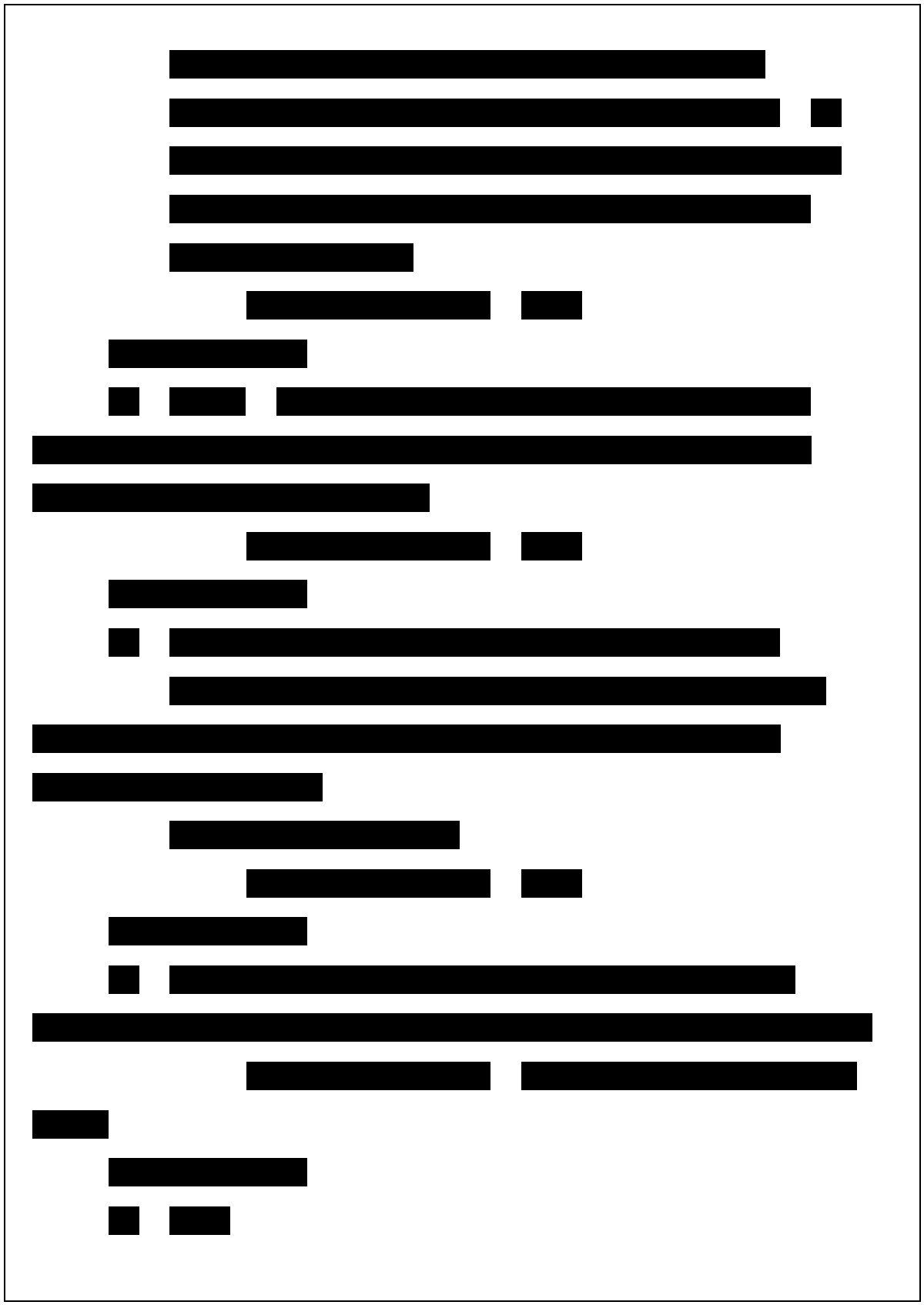
///

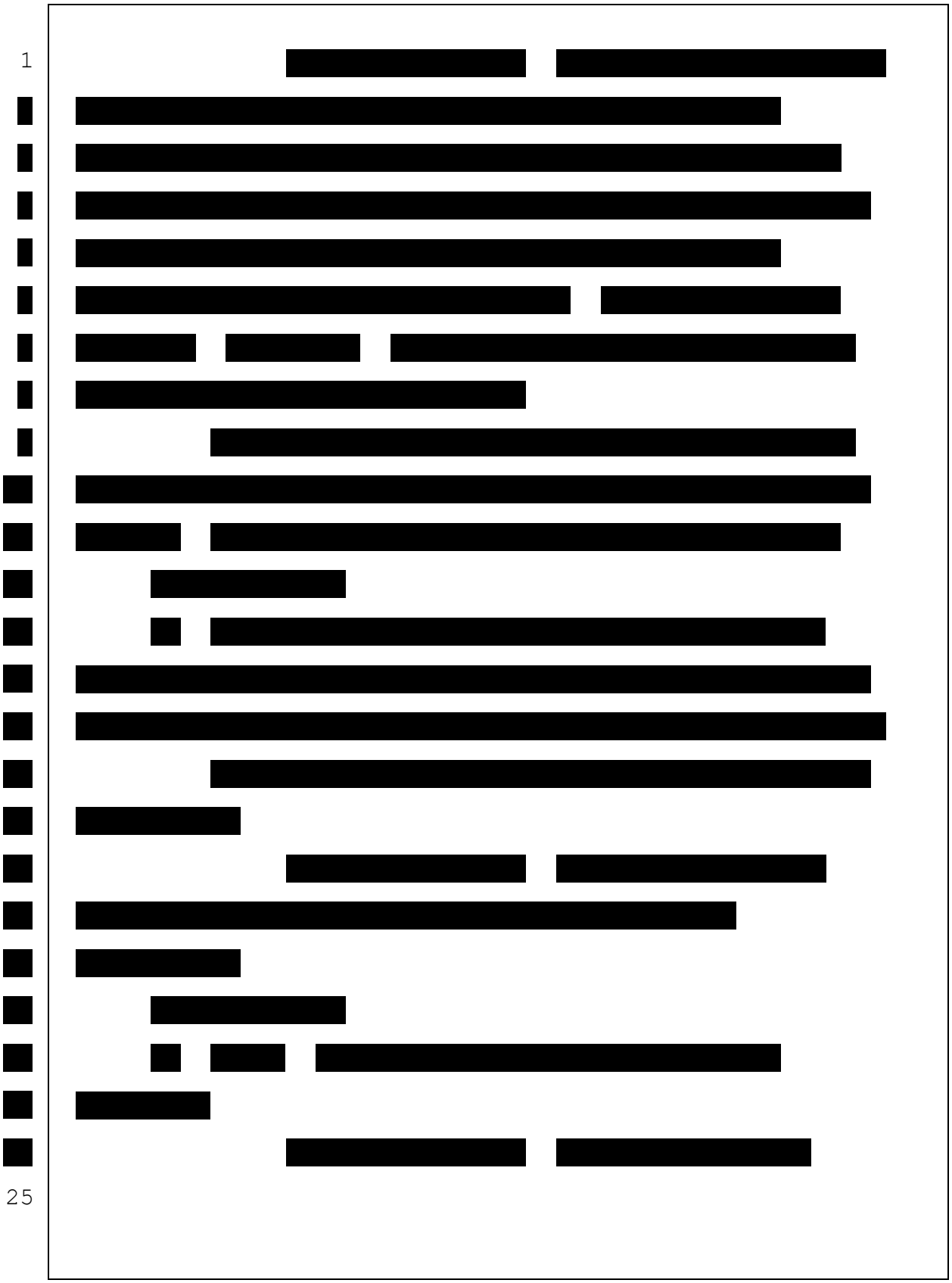
(Start of Confidential Portion)

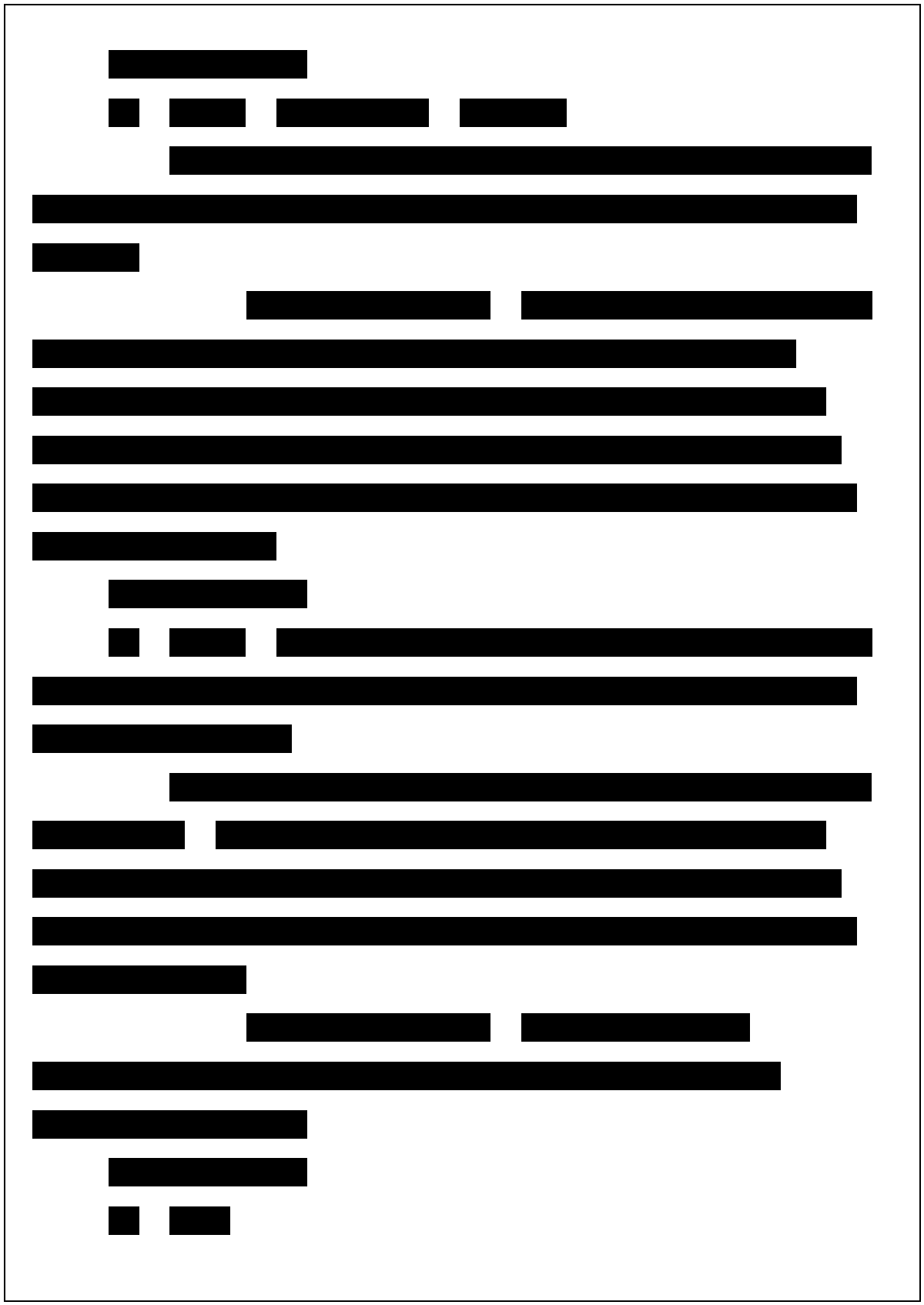


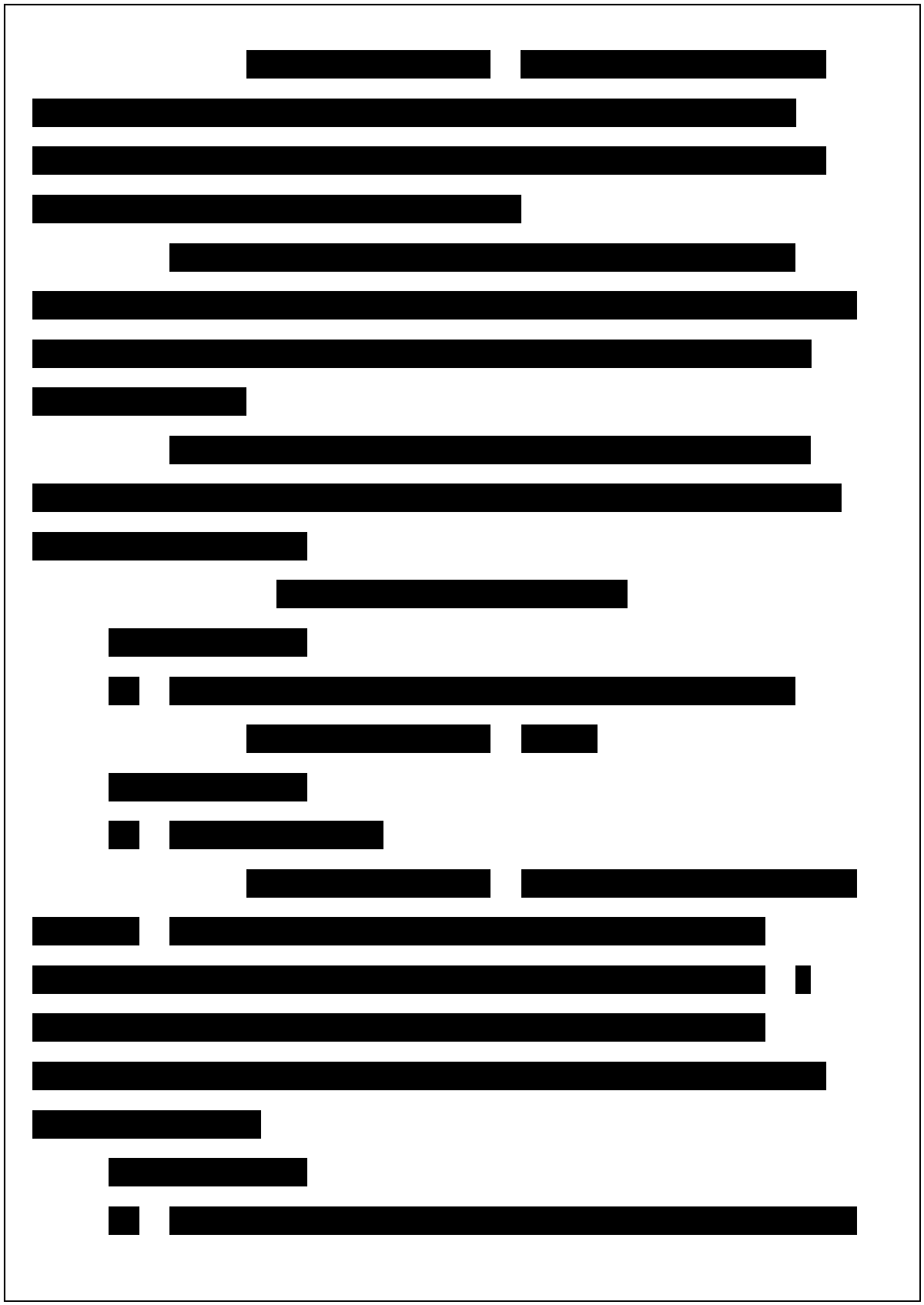


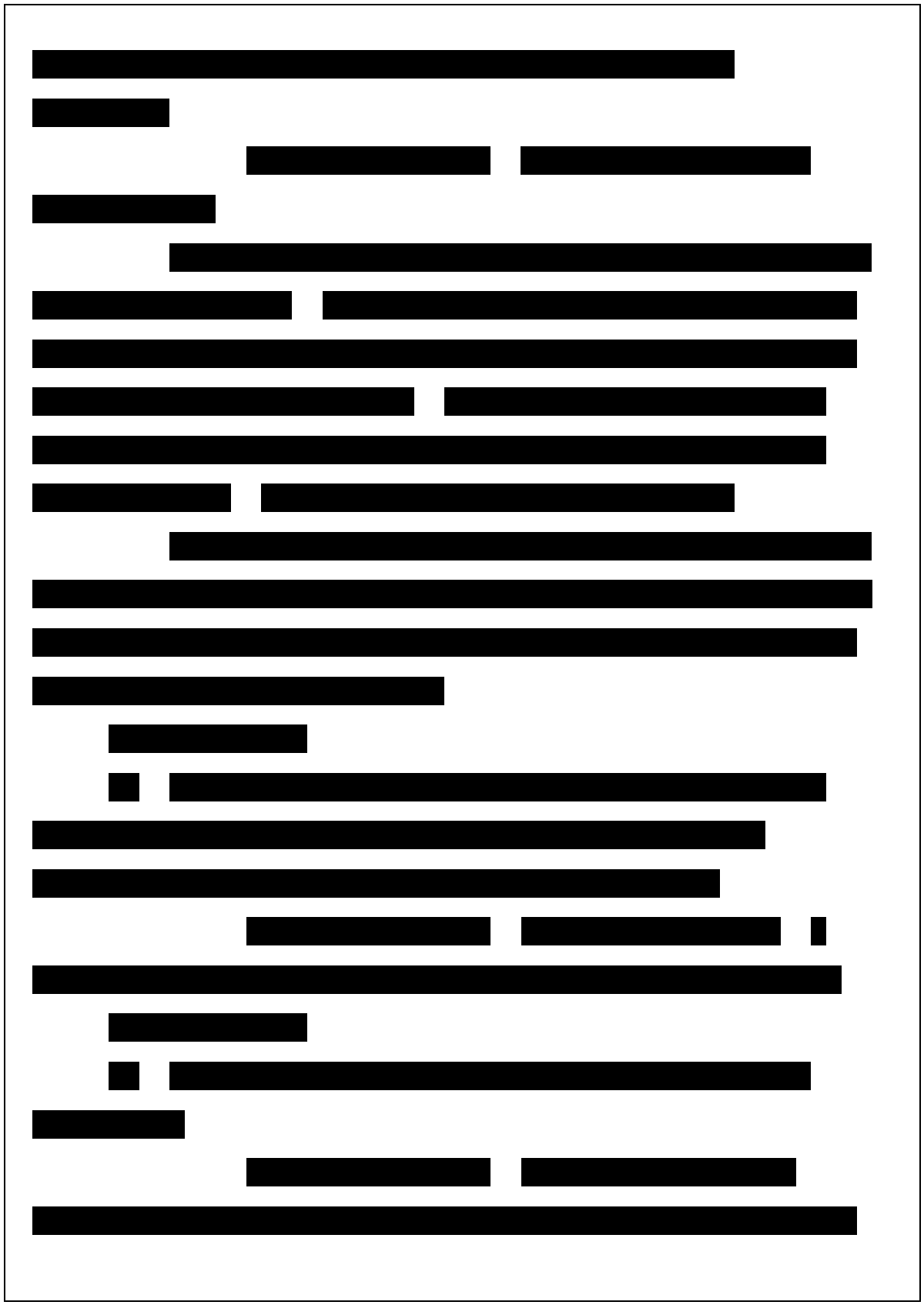

1
just

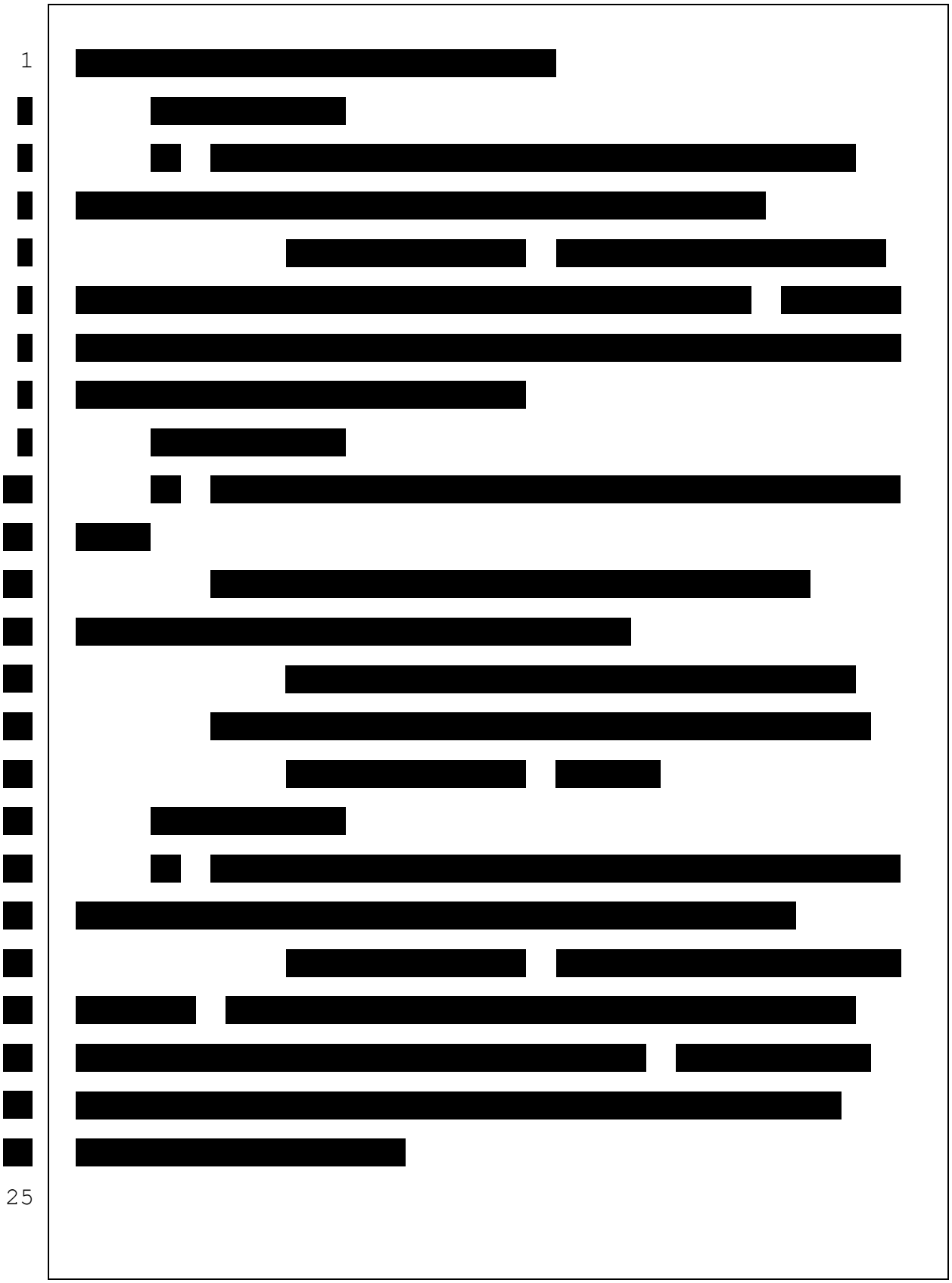


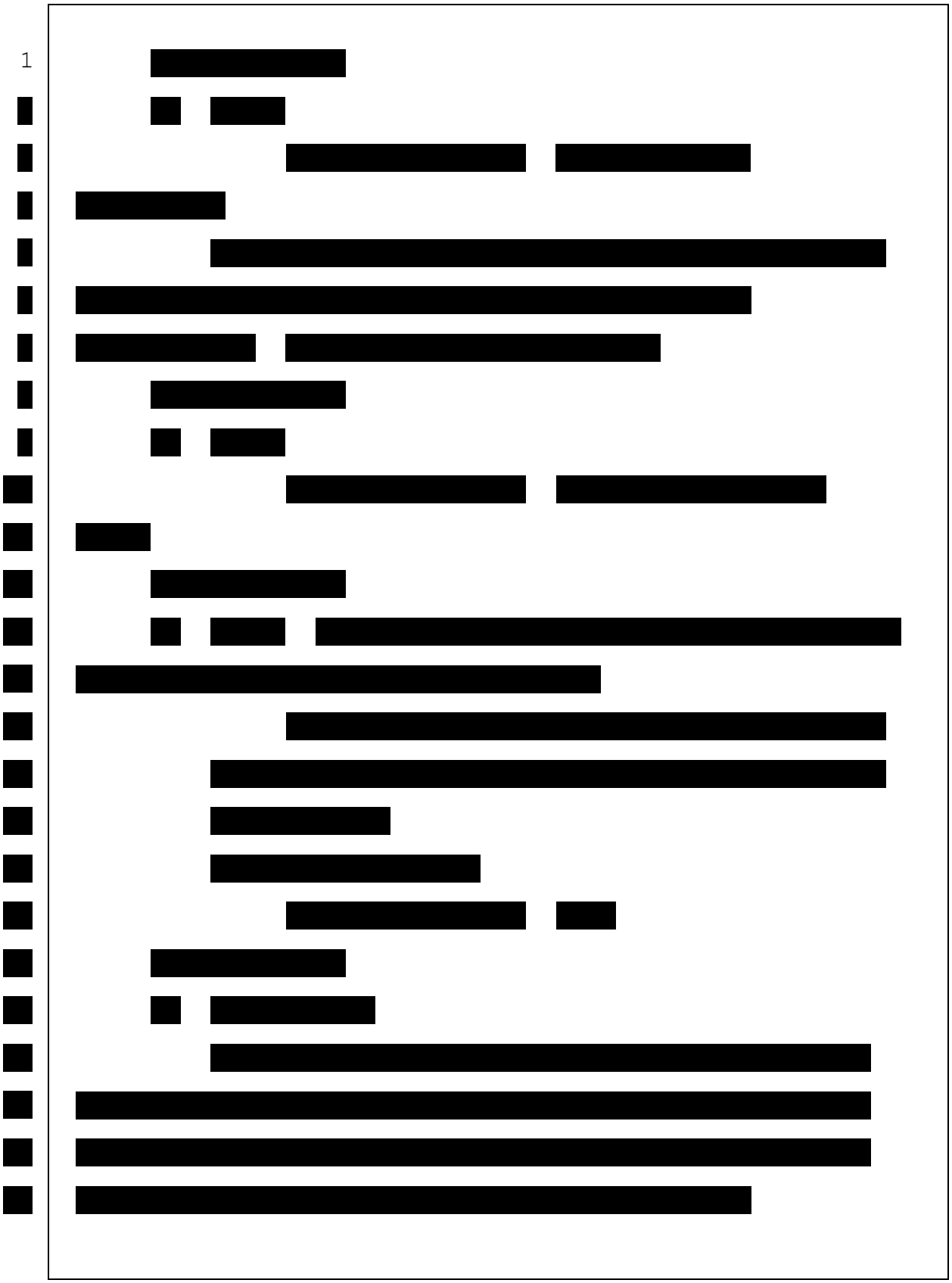


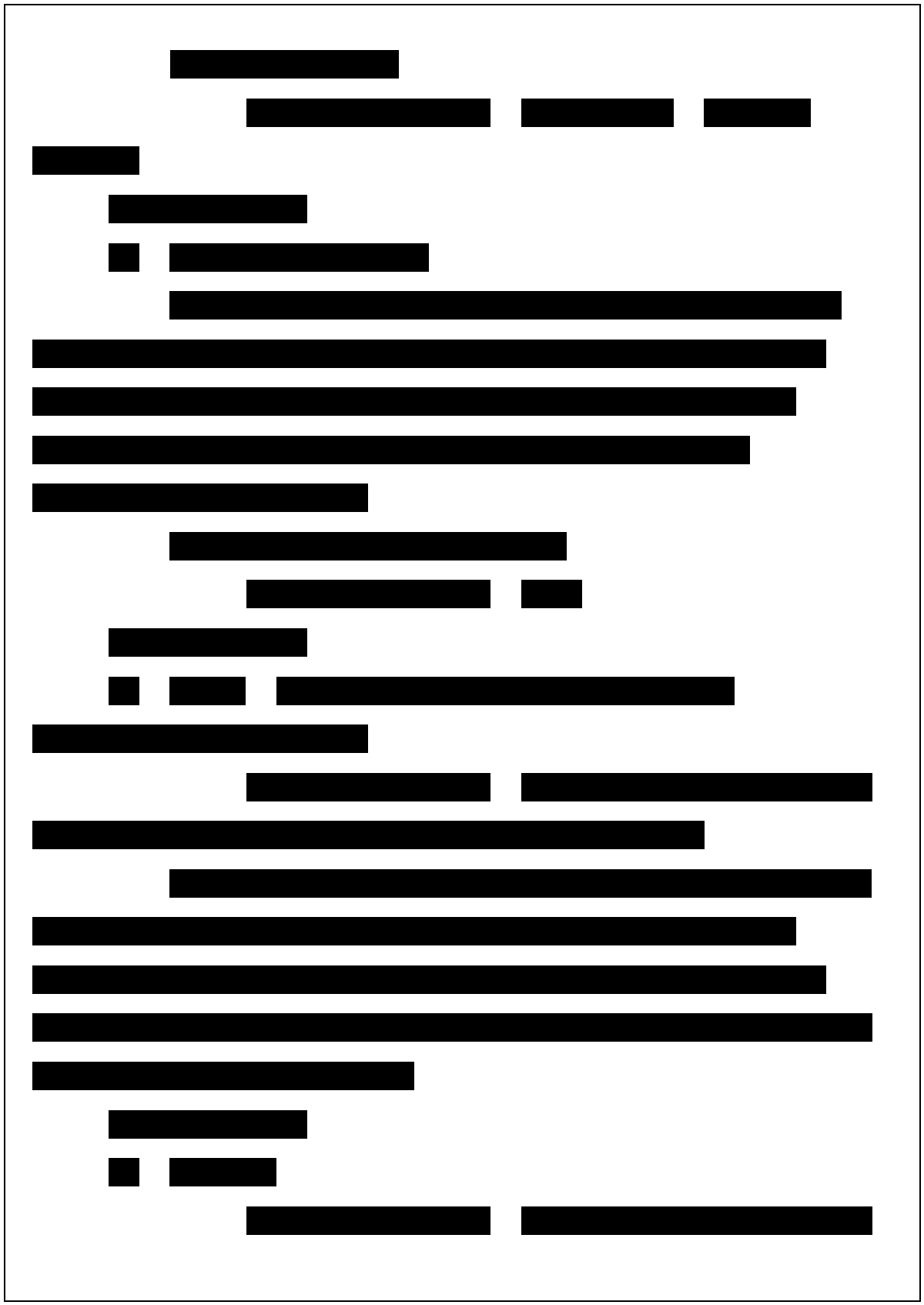


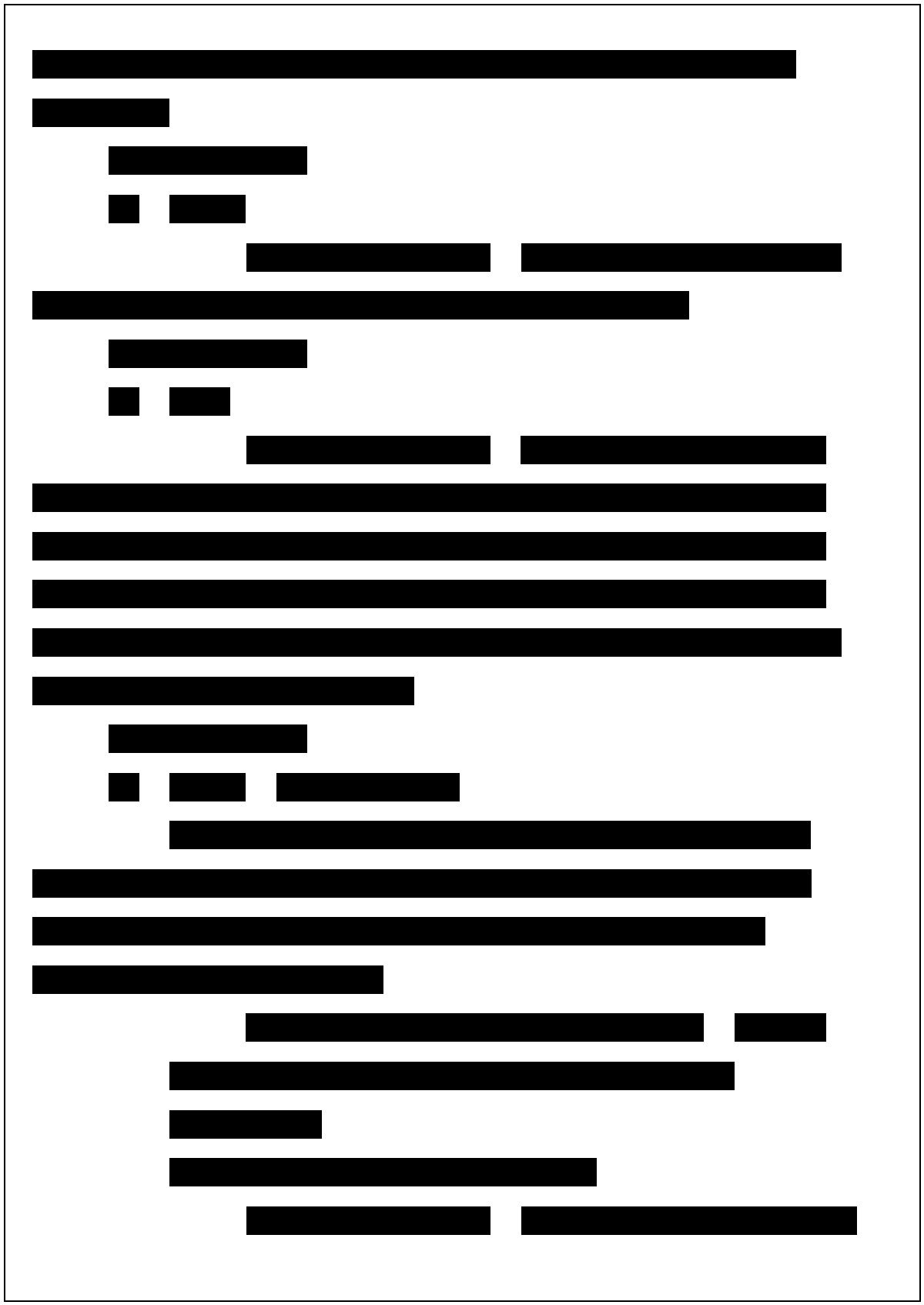


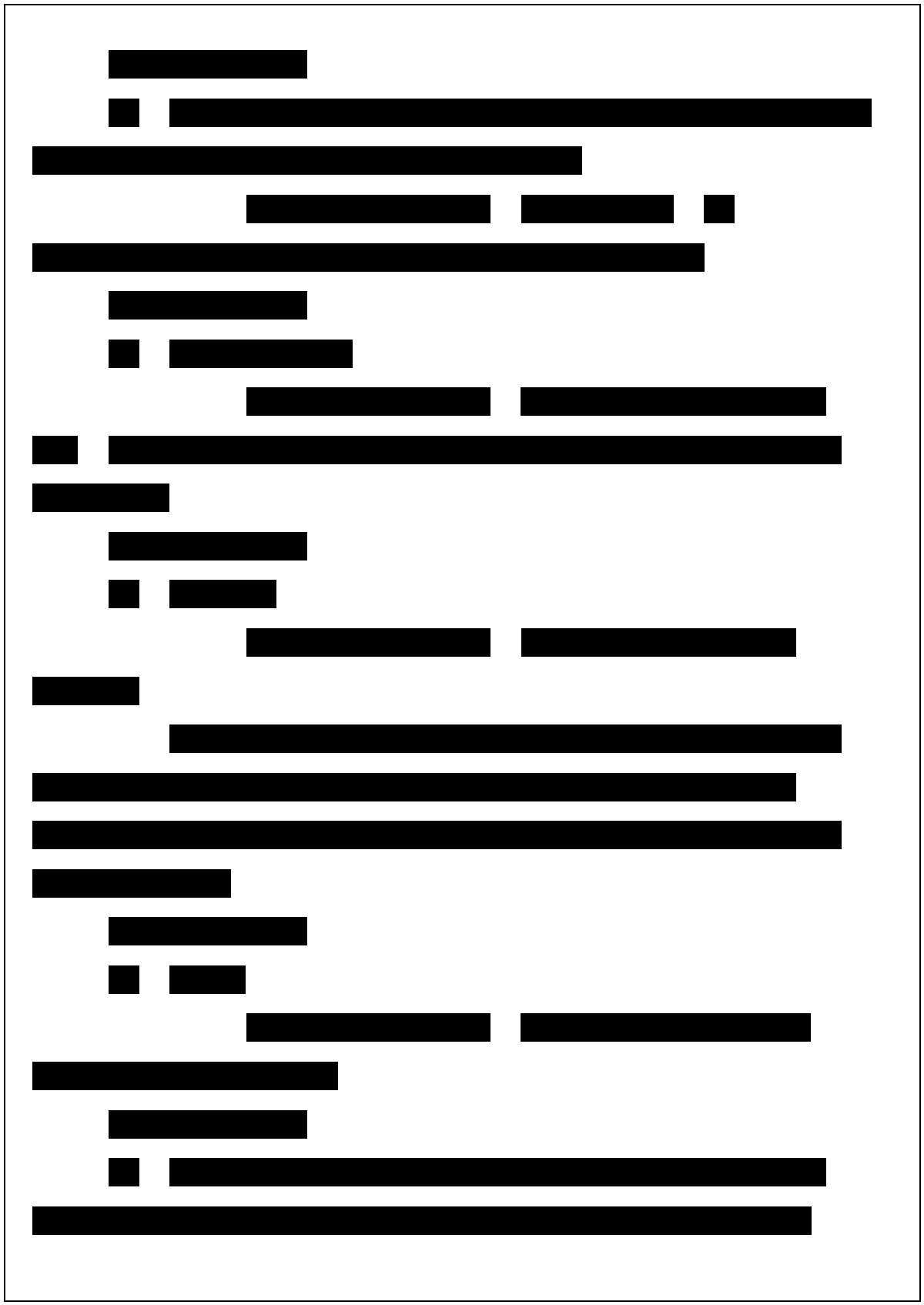


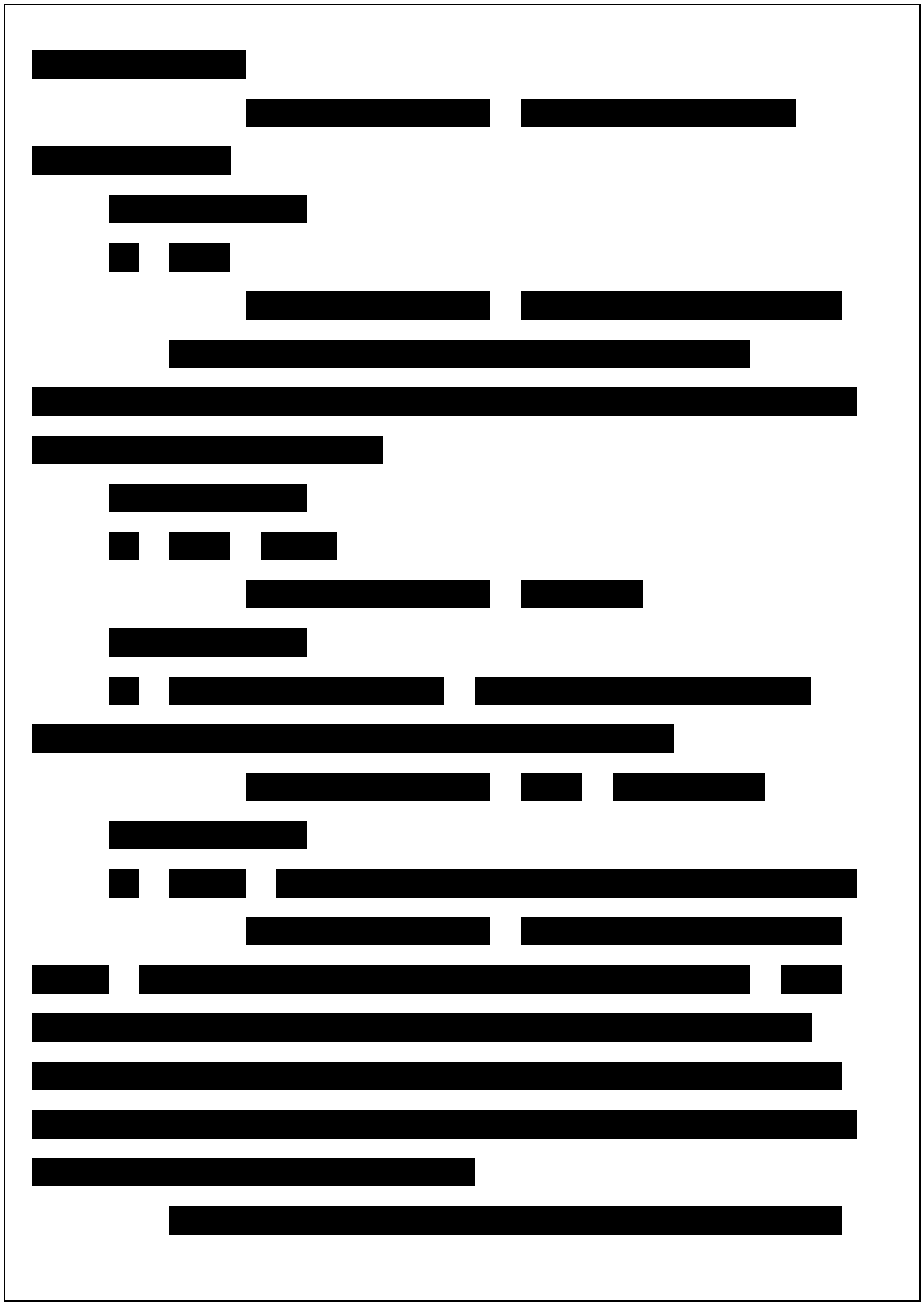


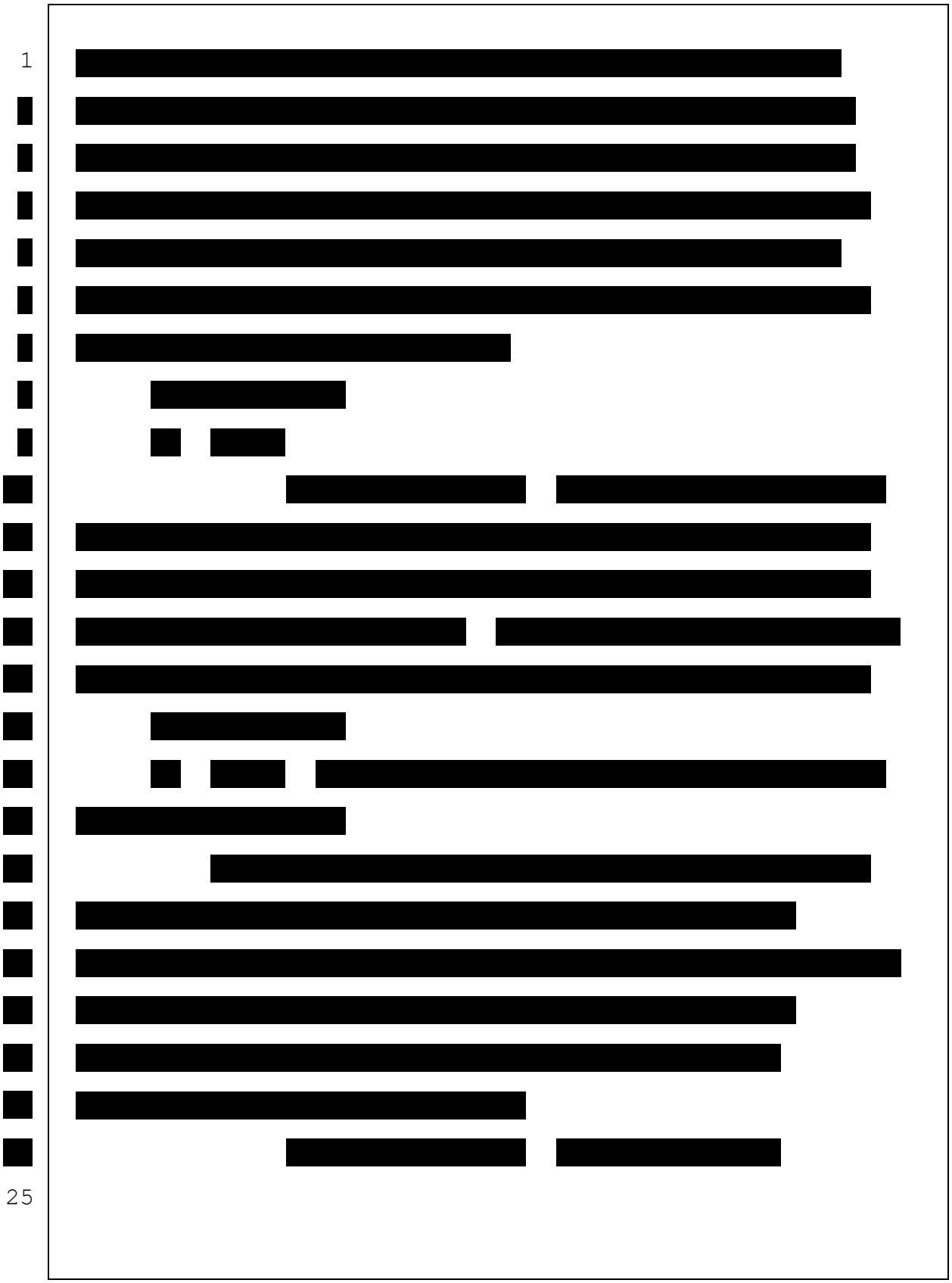


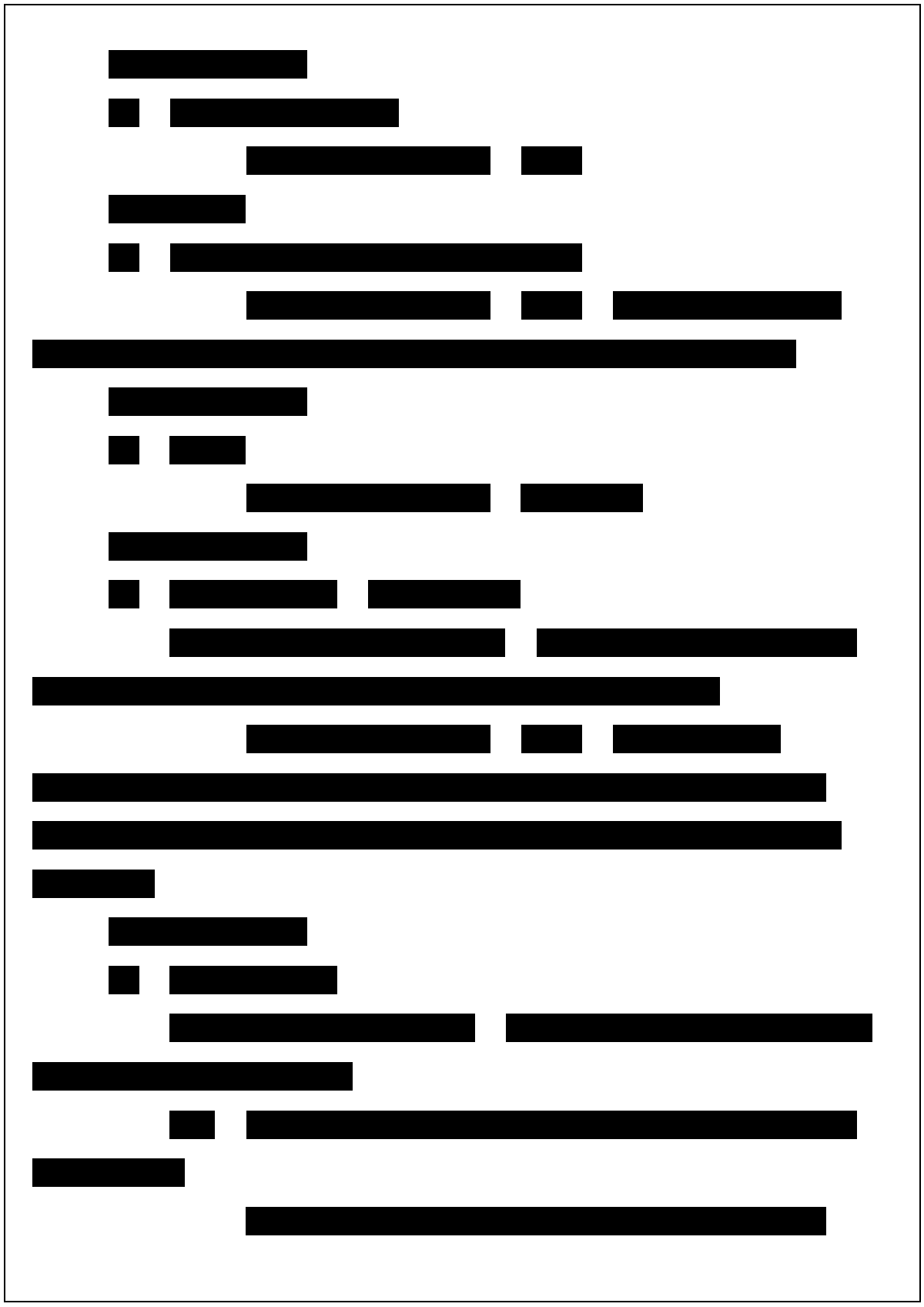


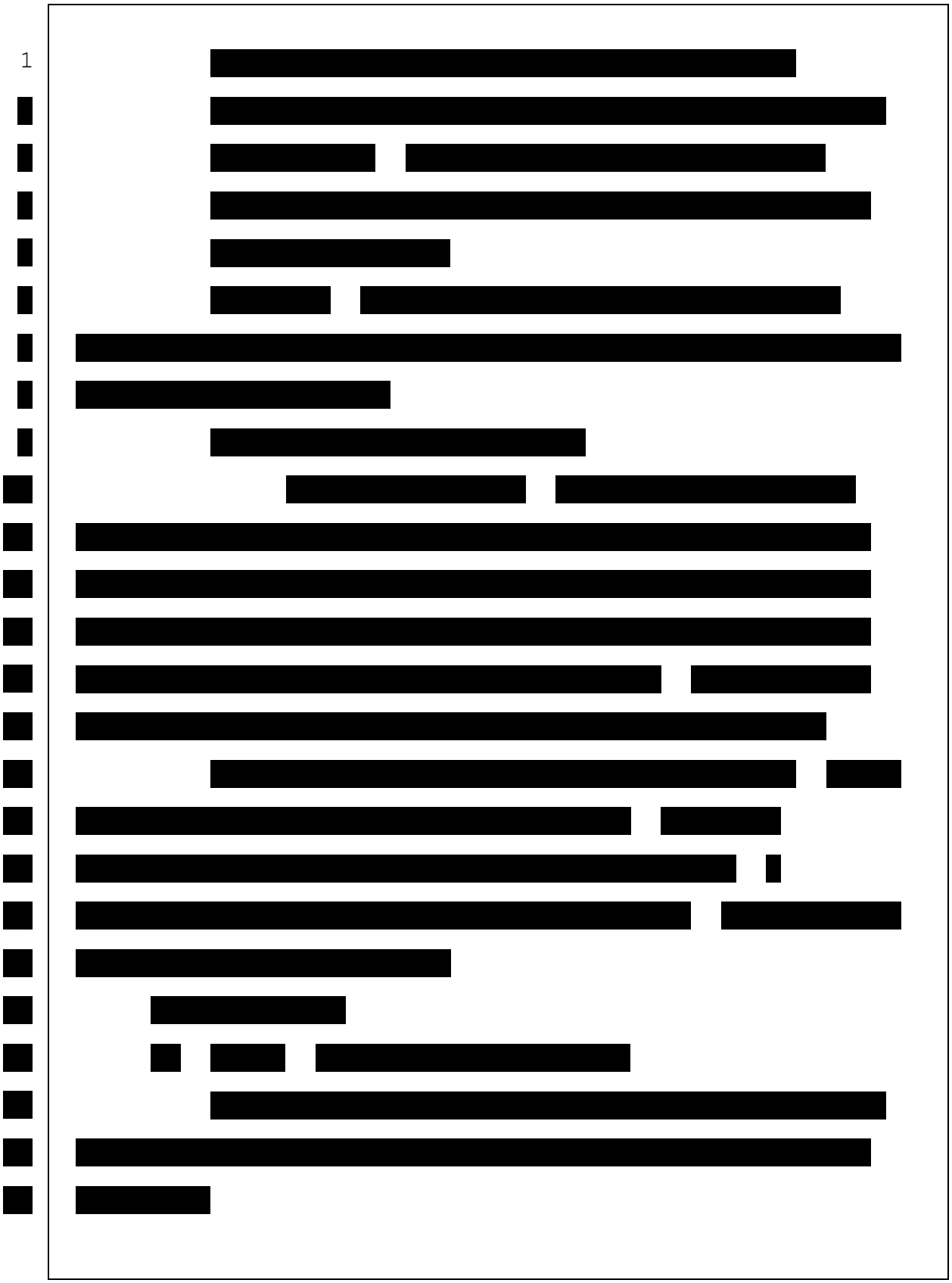


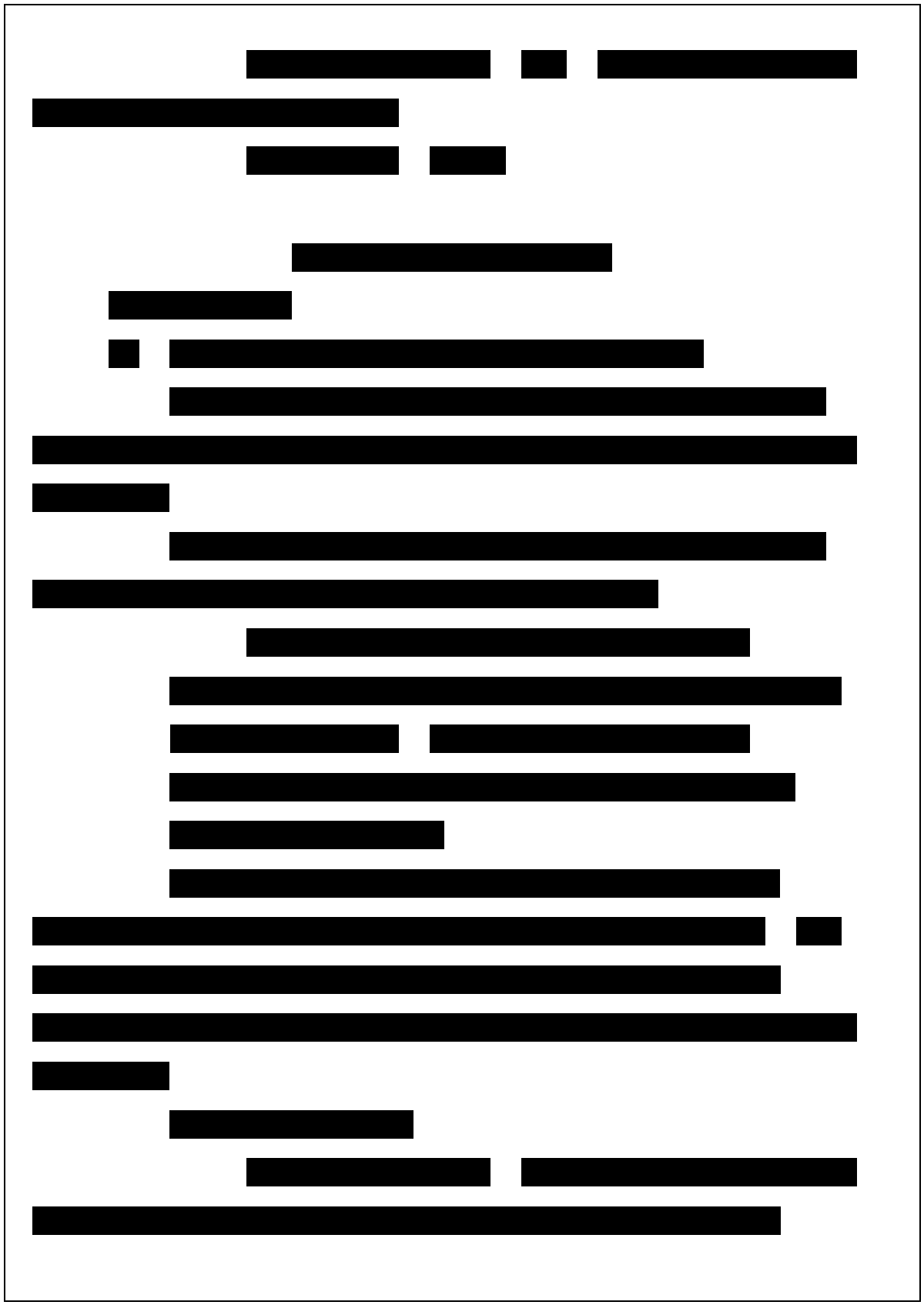


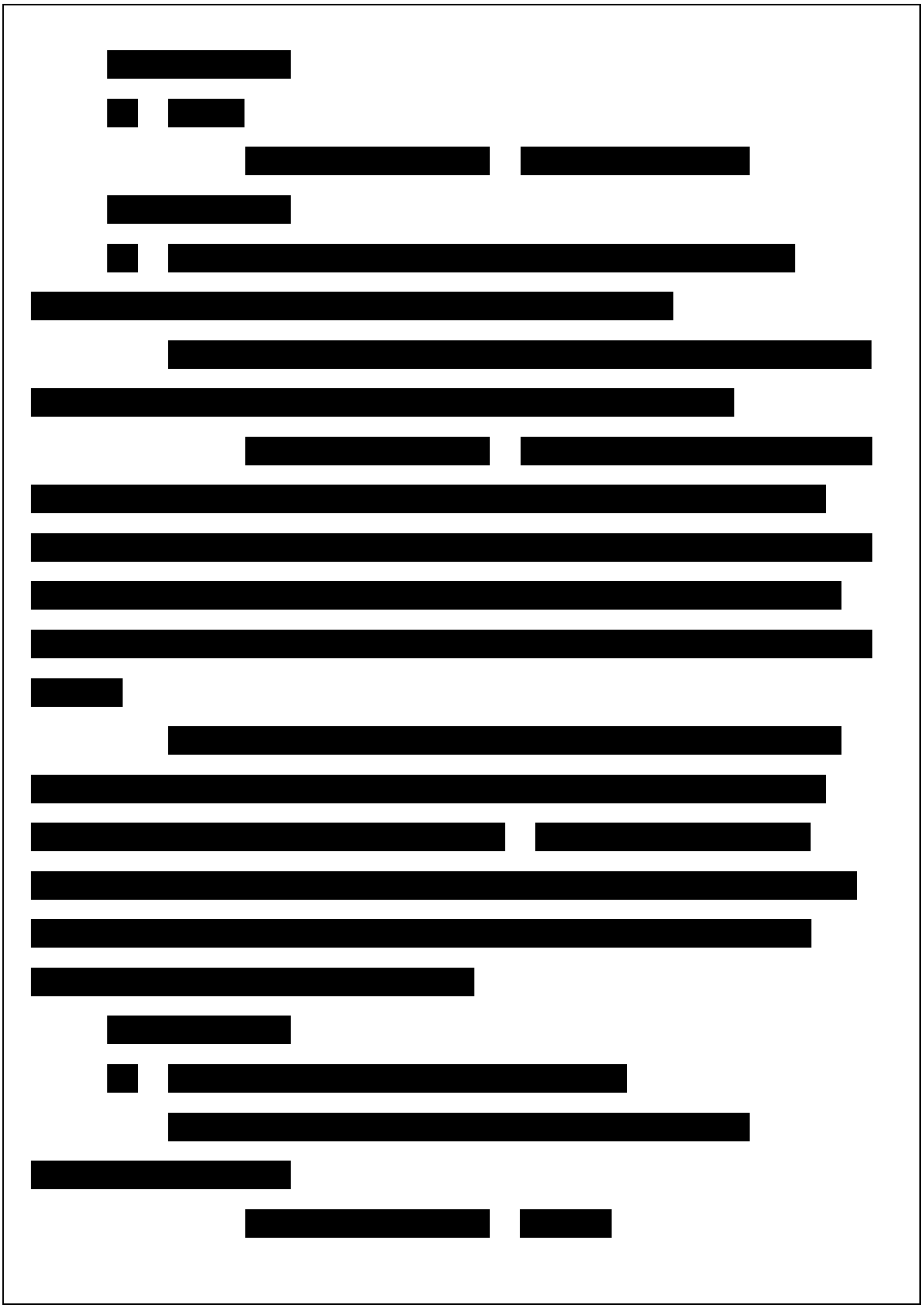


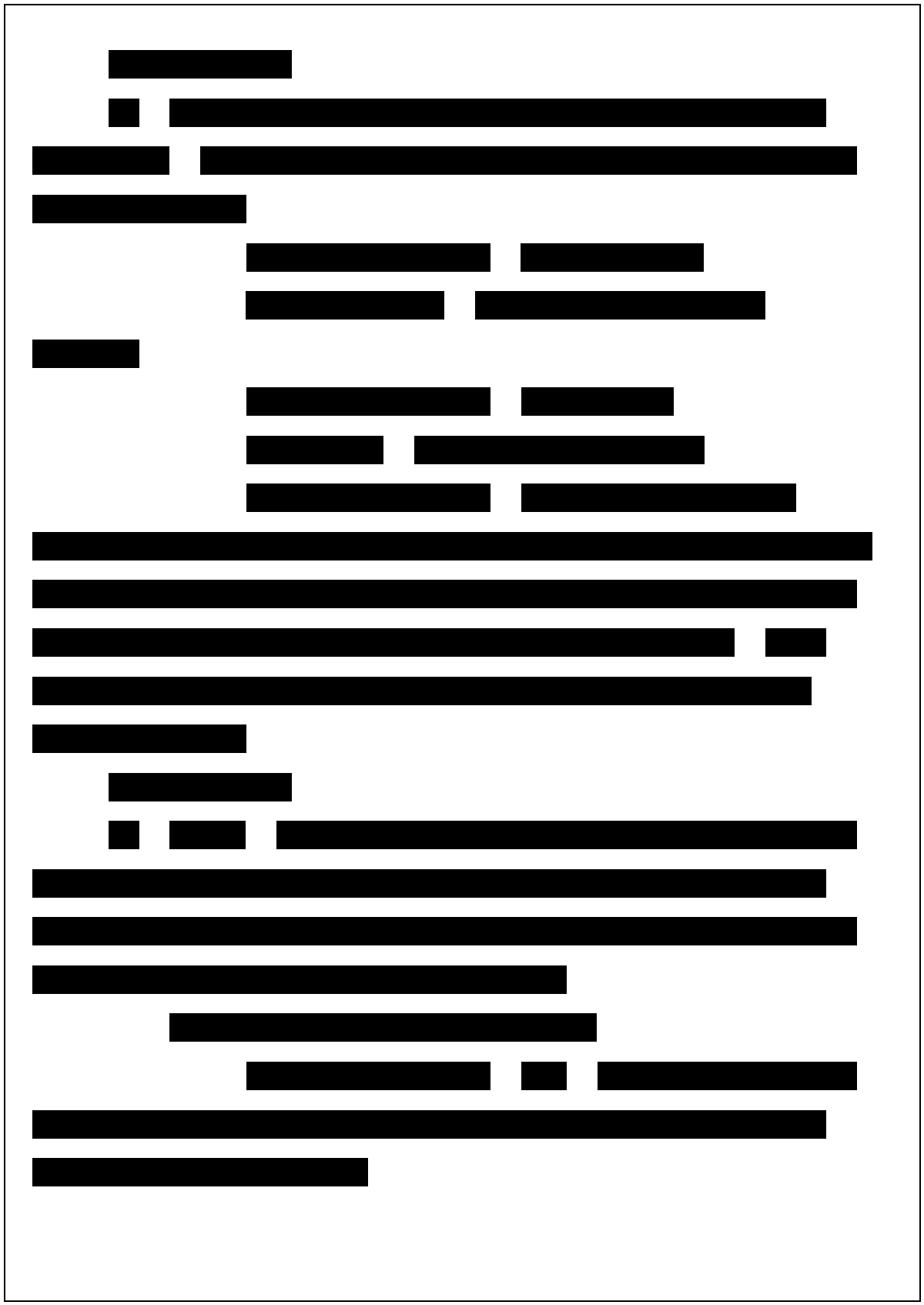


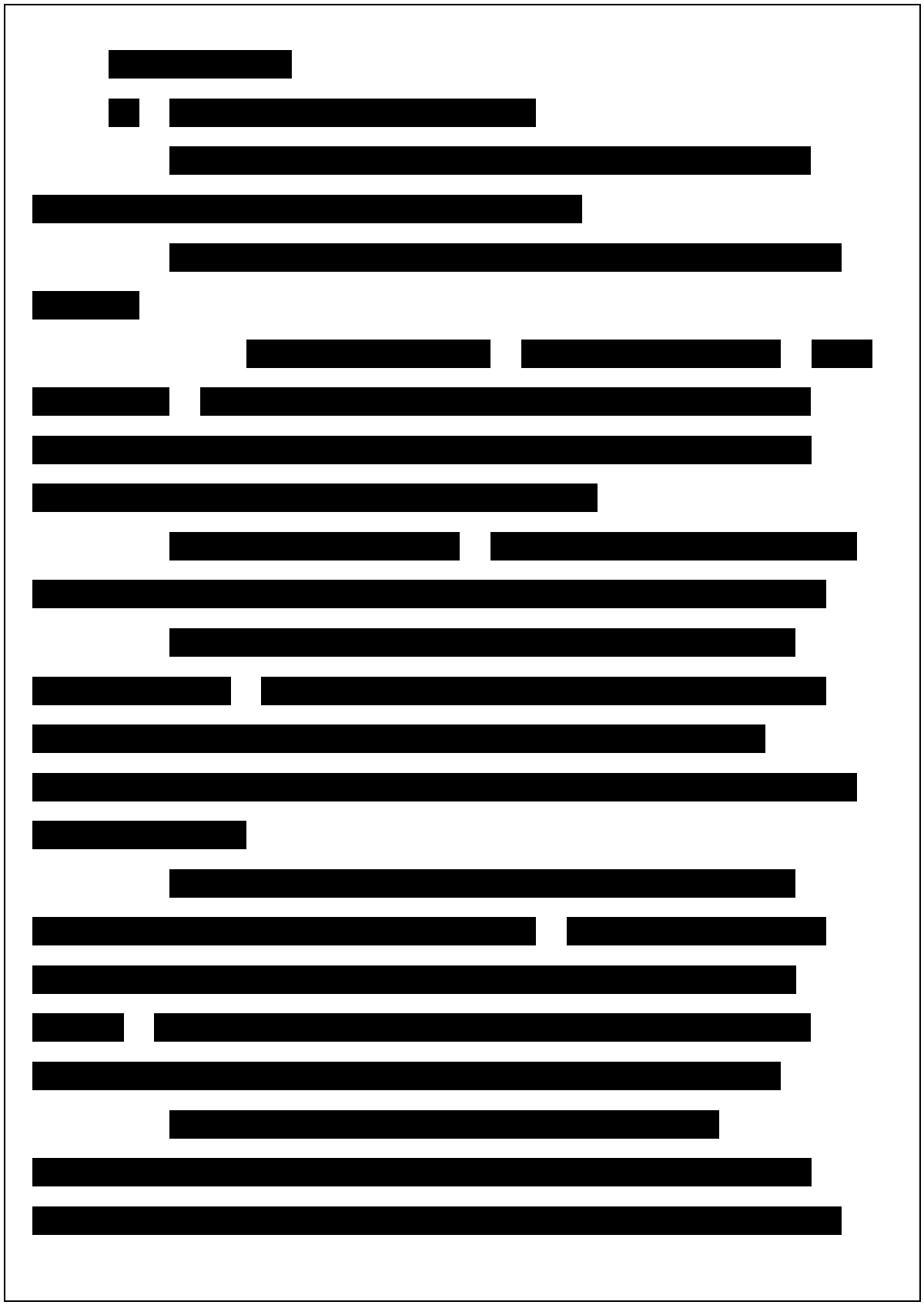


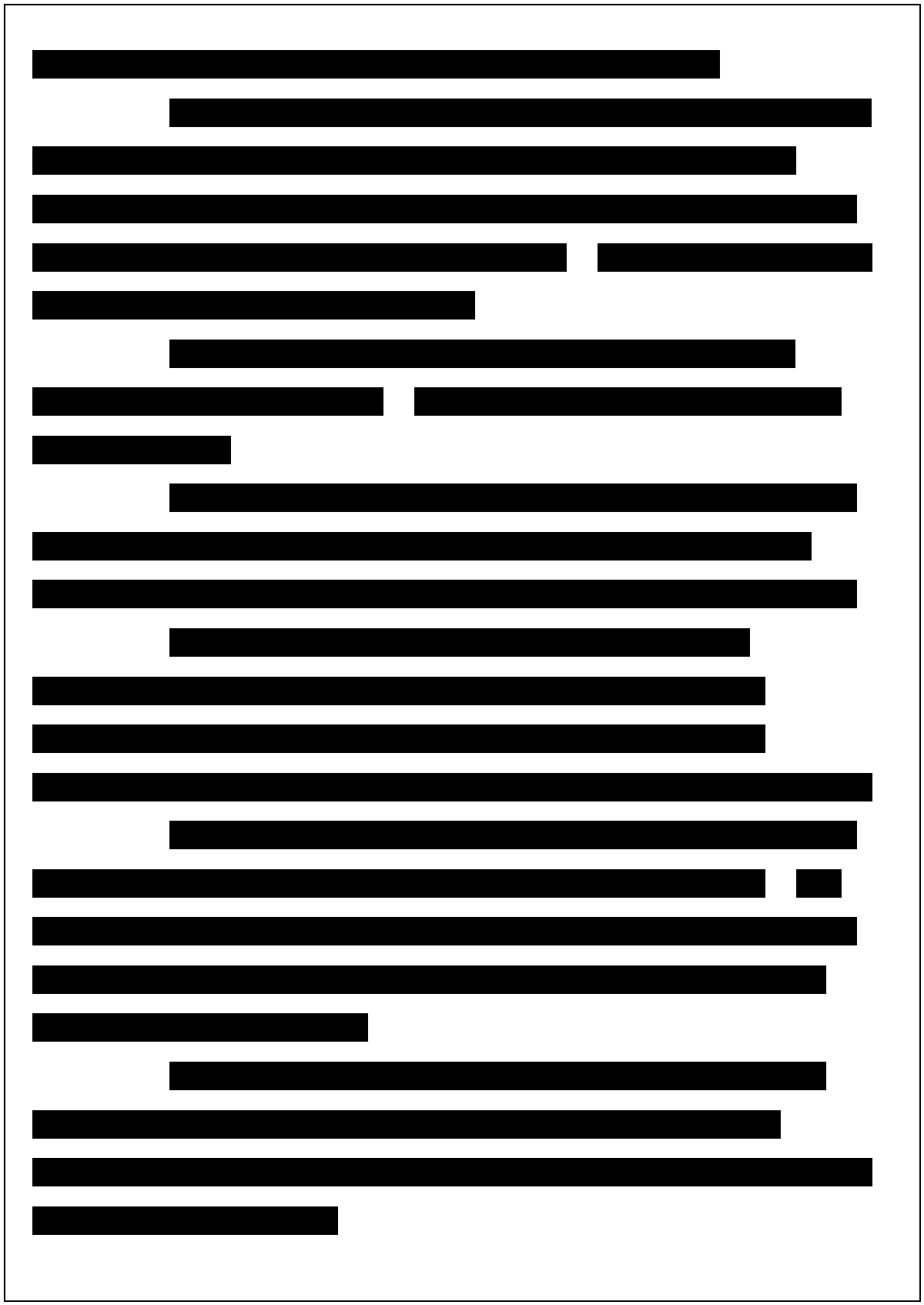


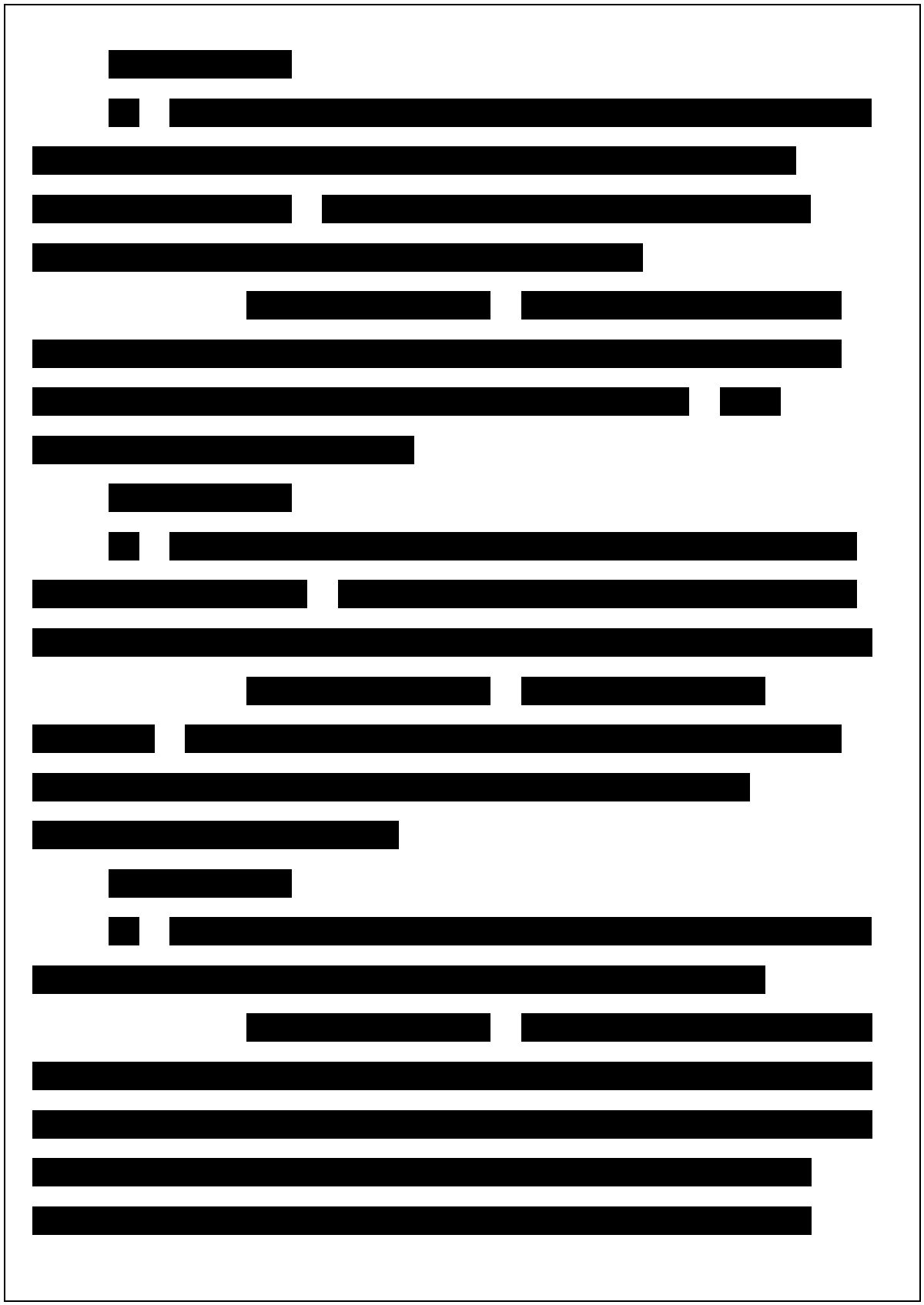


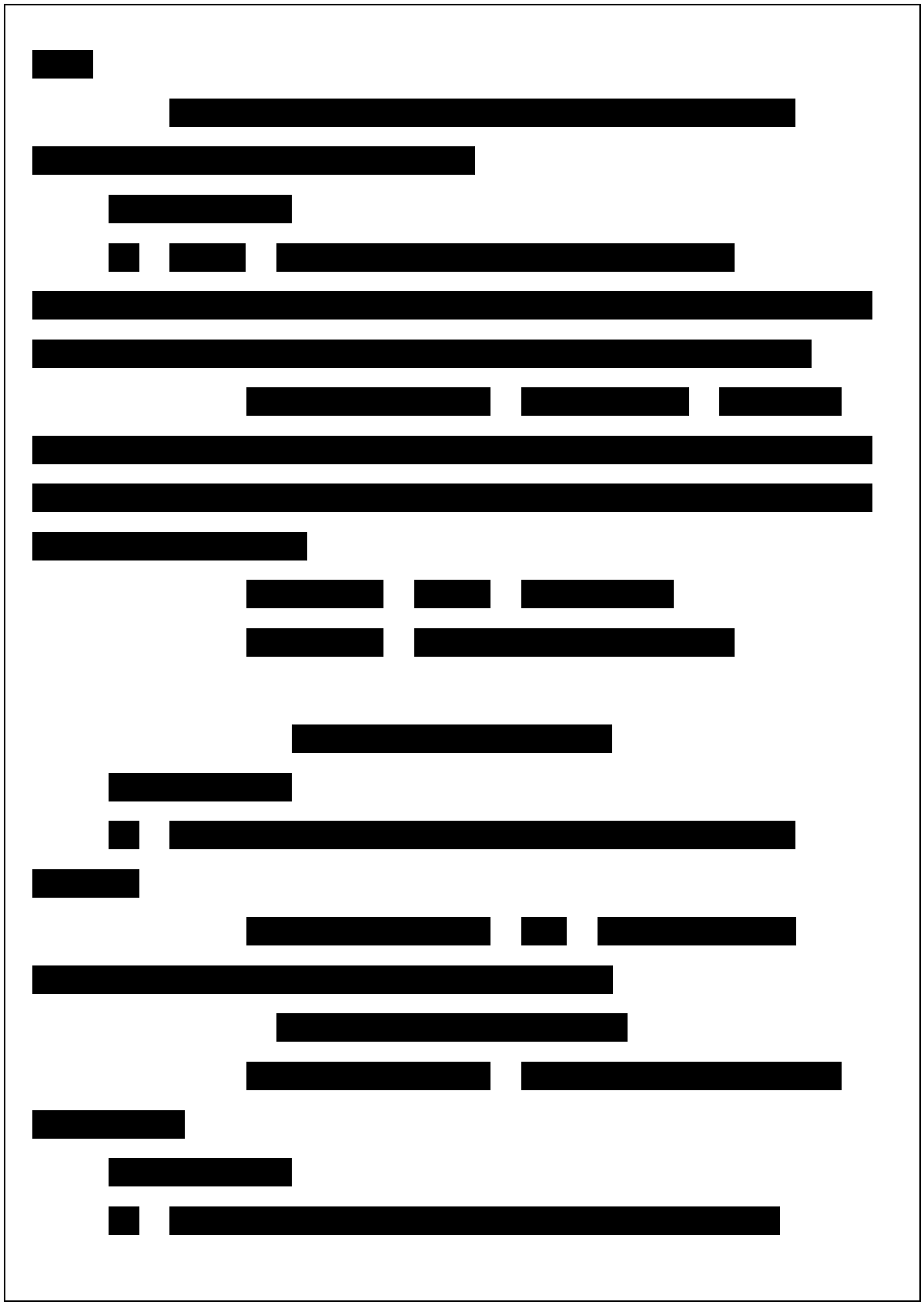


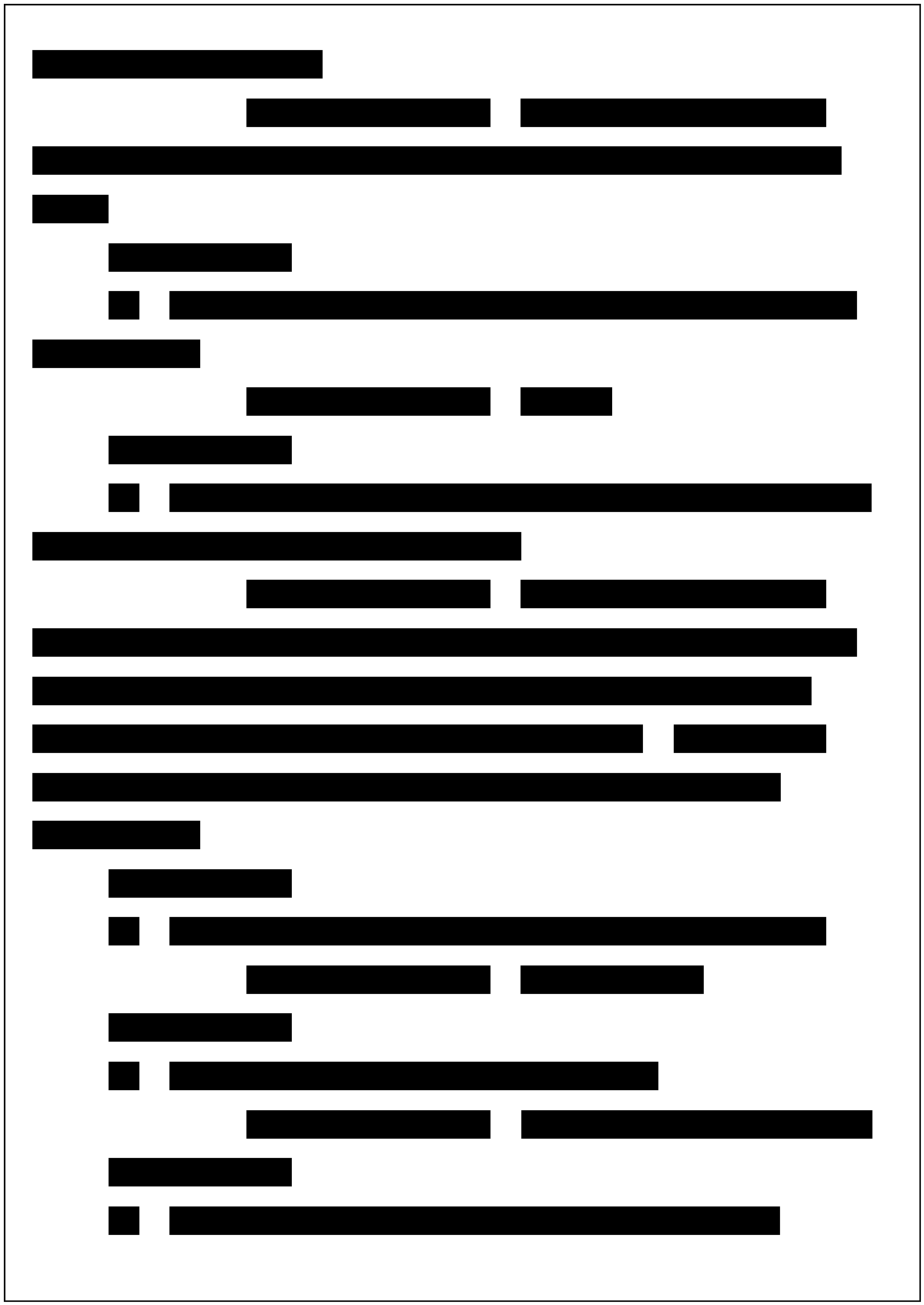


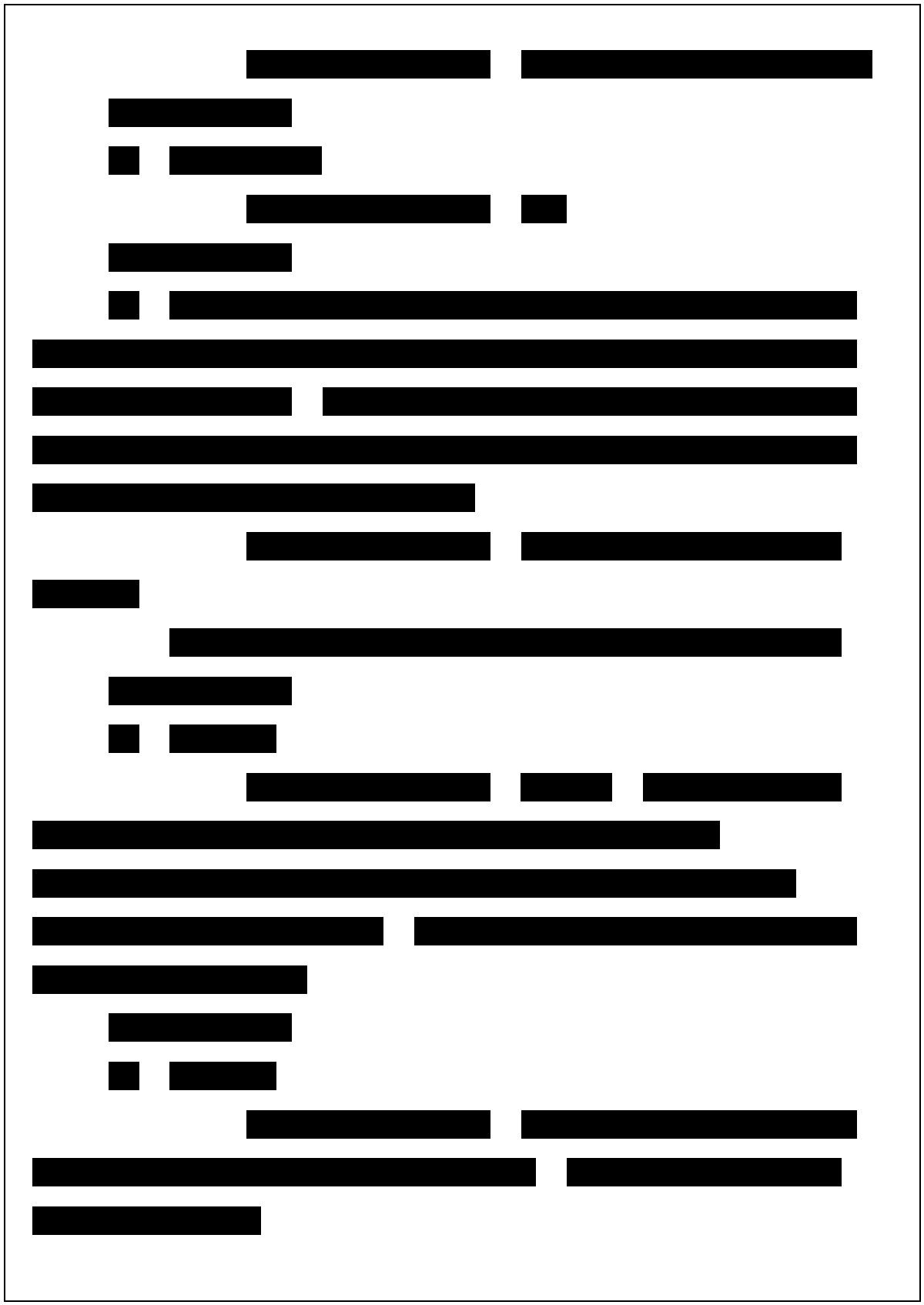


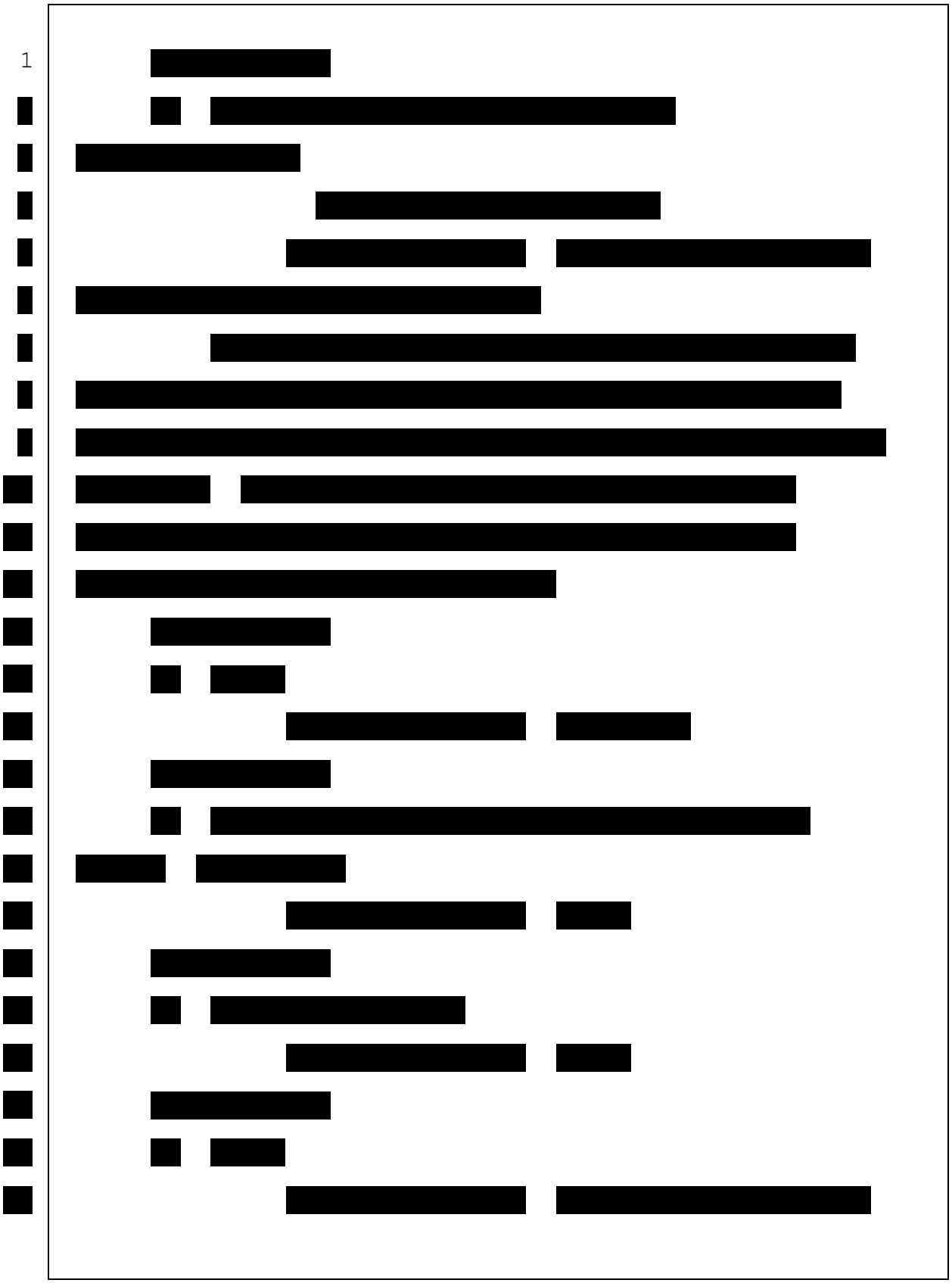


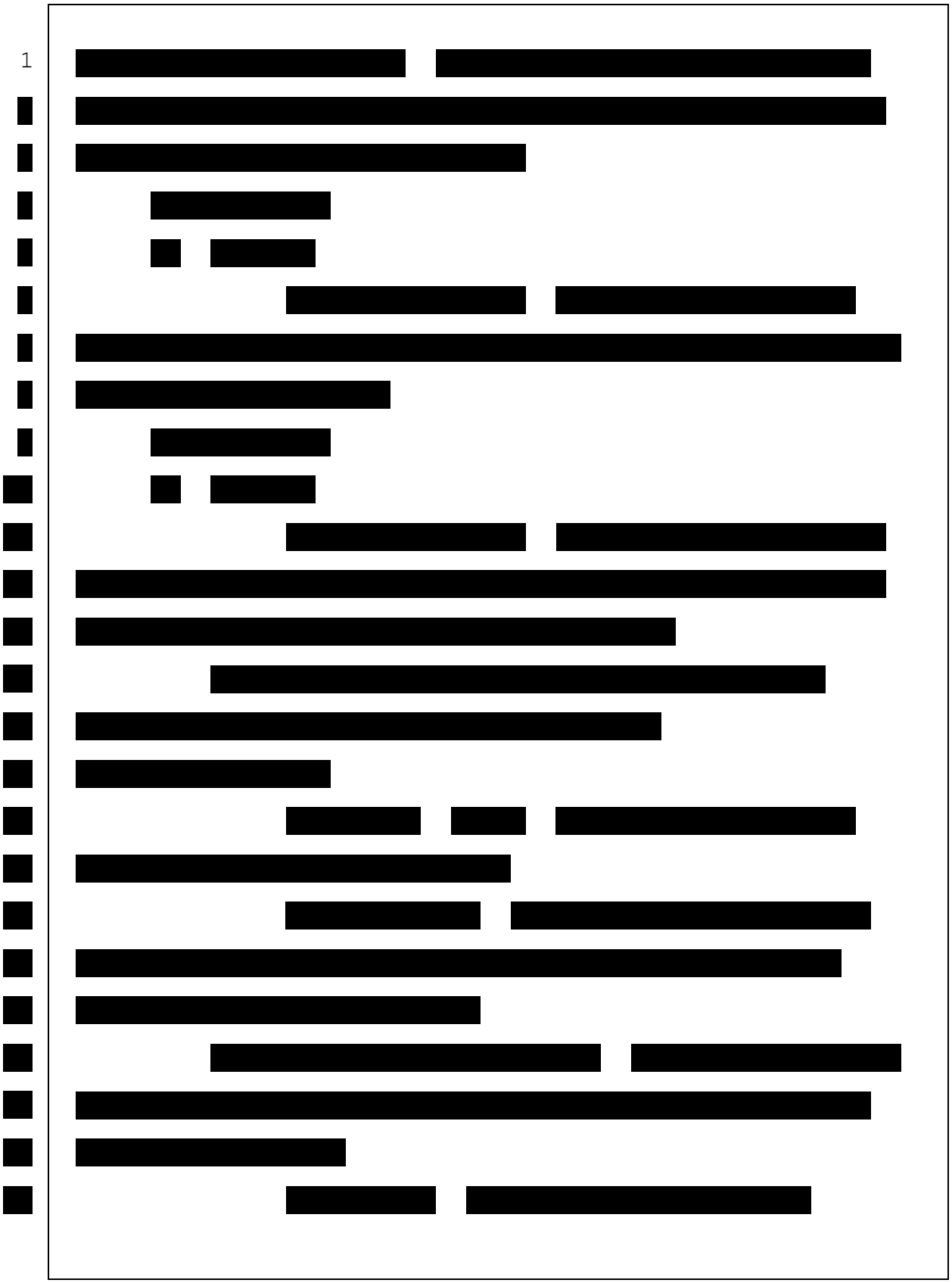


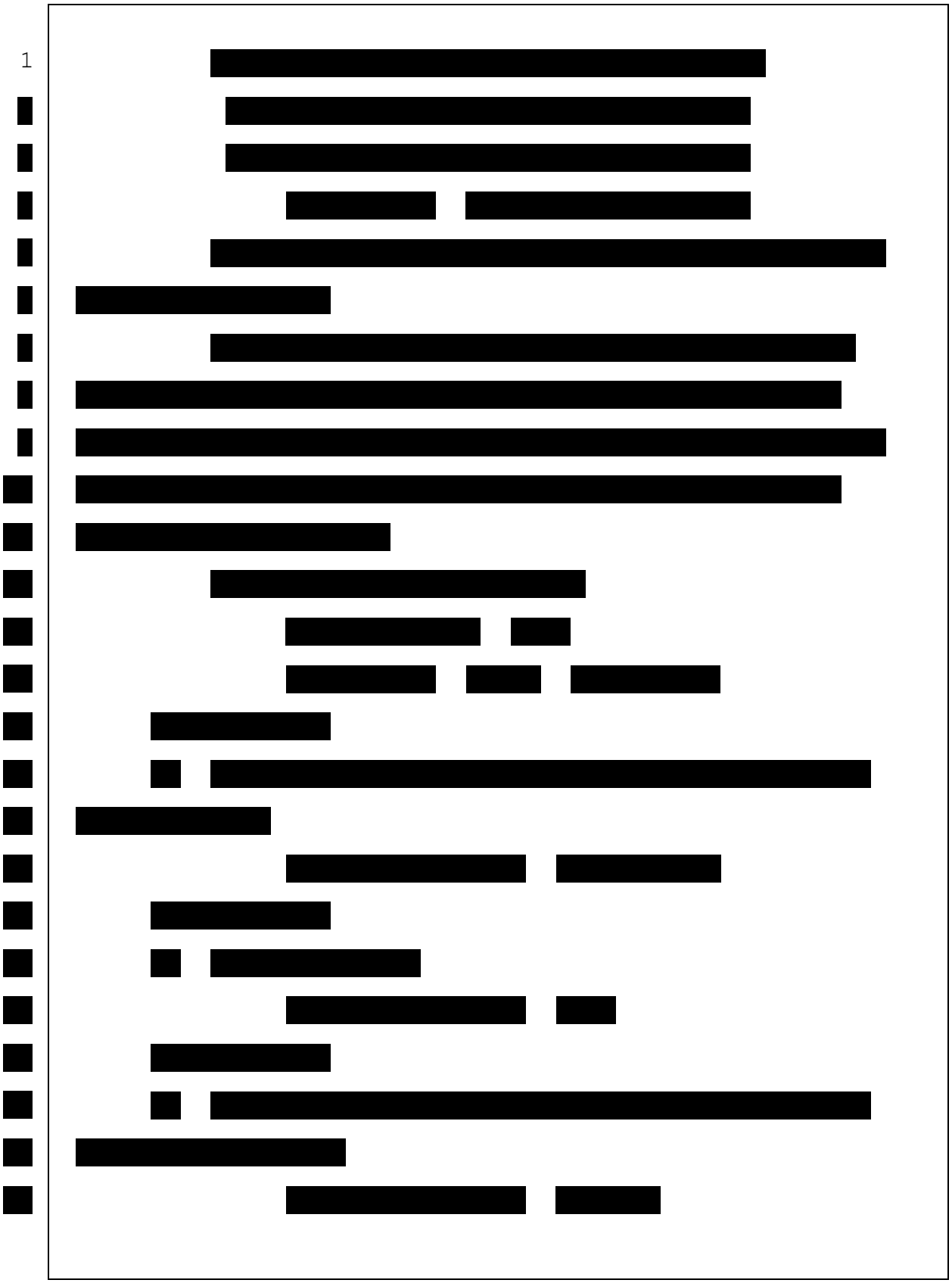


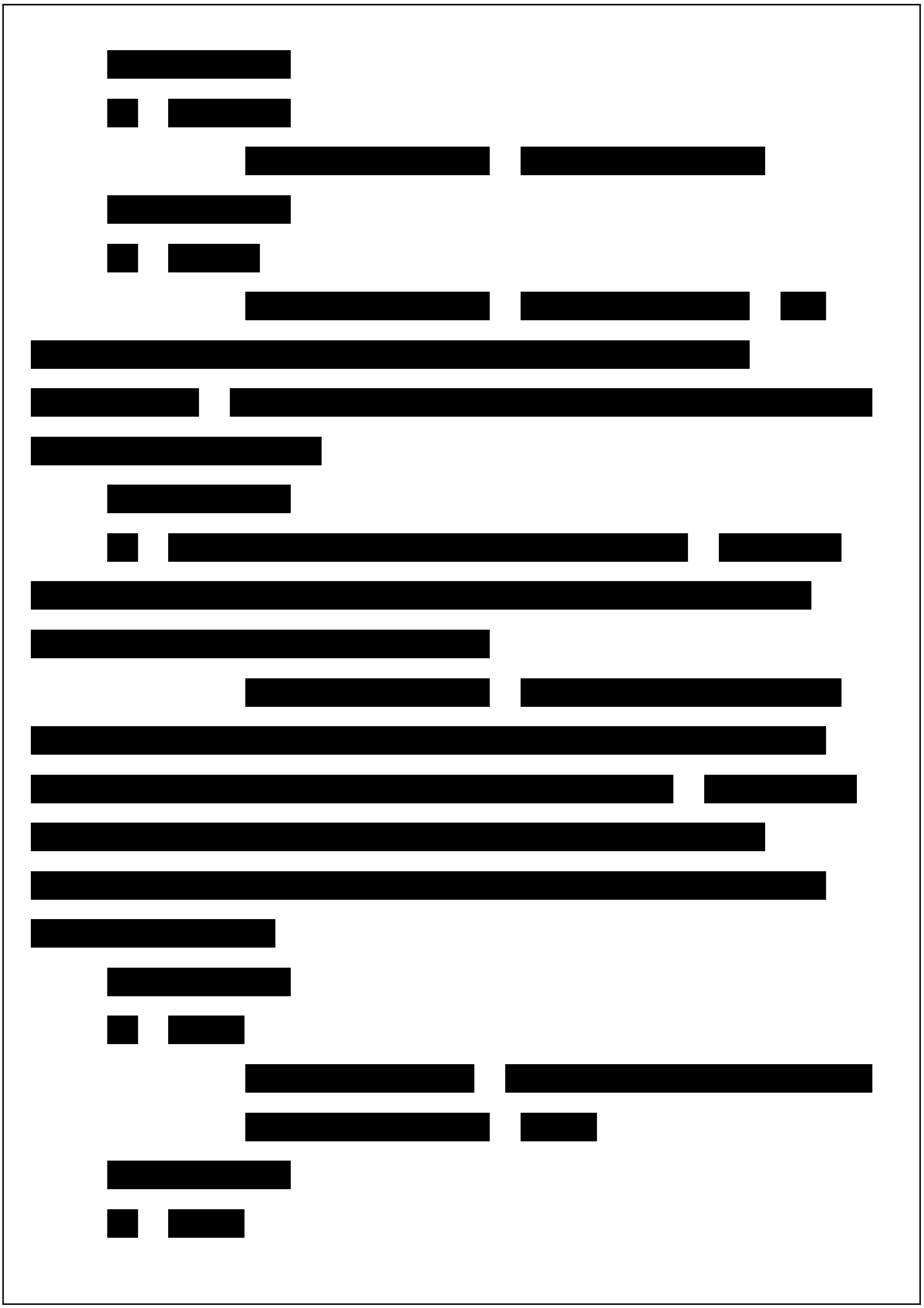


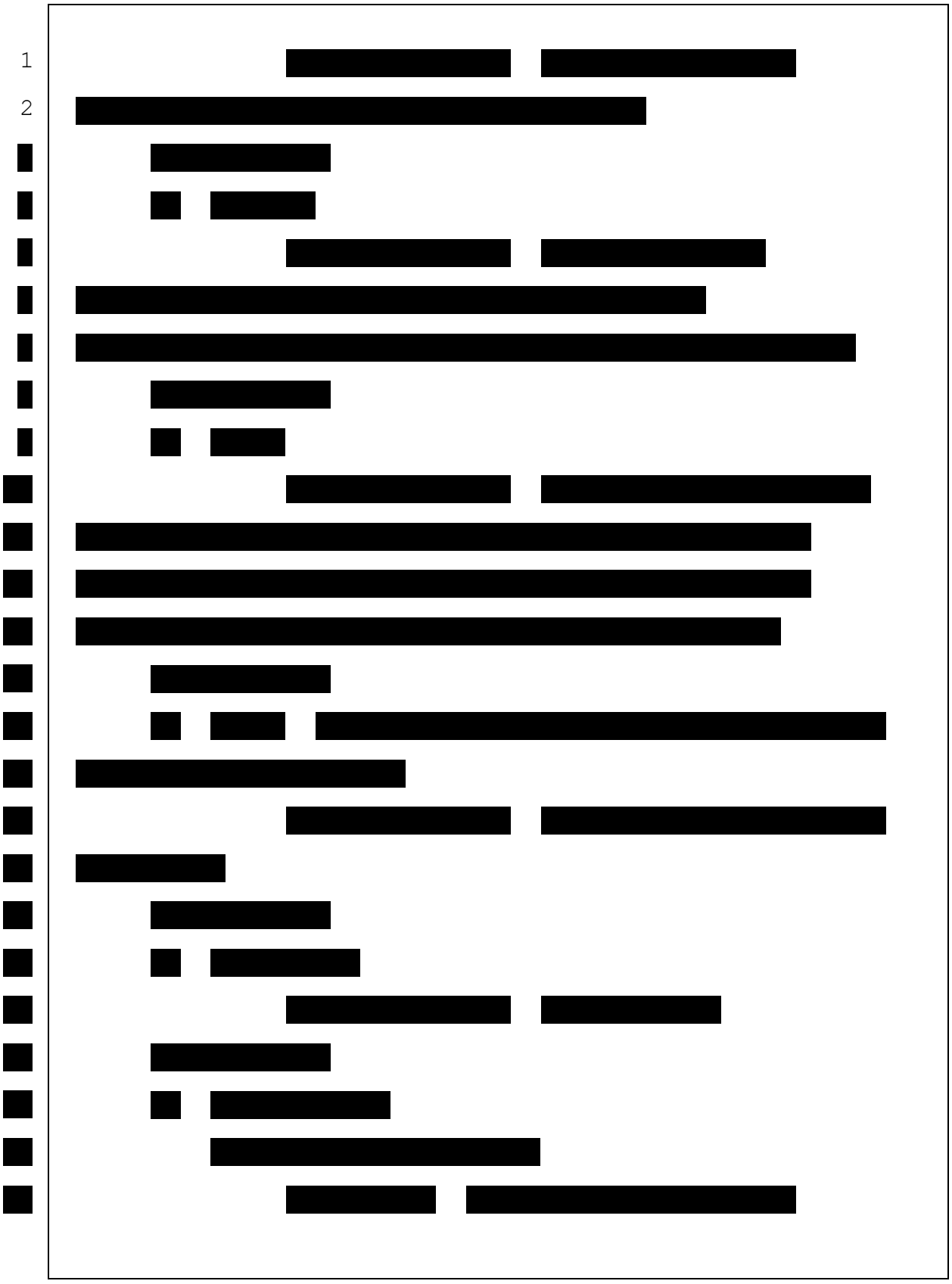


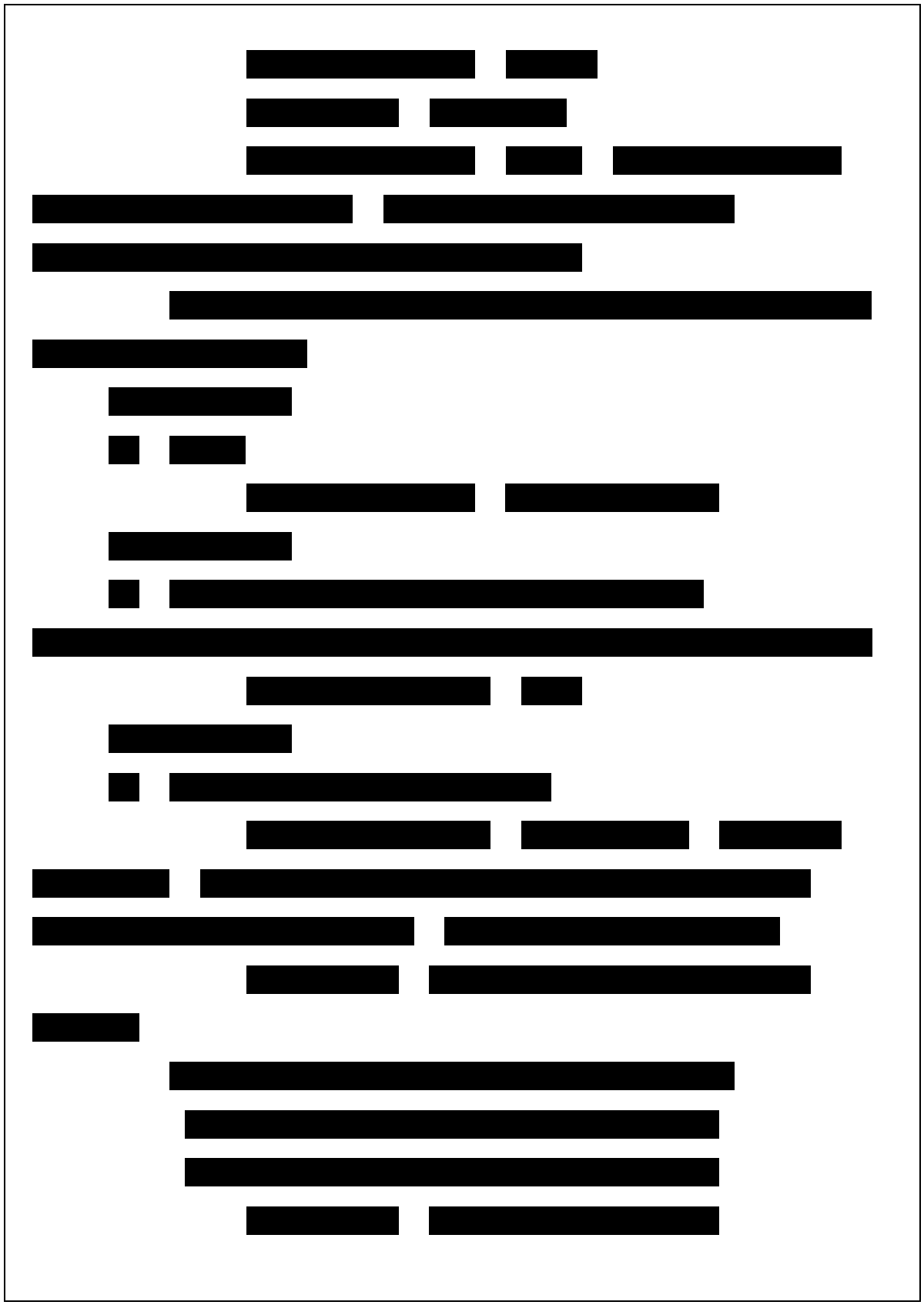












[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]End of Confidential Portion)

///

(Continuation of Non-Confidential Testimony)

BY MR. GRUEN:

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

(Pause in proceedings.)

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Mr. Egbert?

WITNESS EGBERT: Yes.

BY MR. GRUEN:

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

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

WITNESS EGBERT: Okay.

BY MR. GRUEN:

Q. -- to answer.

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

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

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

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

WITNESS NEVILLE: Yes.

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

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

BY MR. GRUEN:

Q. Indeed.

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

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

(Whereupon, a discussion was held off the record commencing at 2:54 p.m.)

(Proceedings resumed at 2:55 p.m.:)

MR. GRUEN: So back on the record.

The document that is entitled "Well Operations-Well Kill SCG 224.0030" is marked as Exhibit 5.

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

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

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

(Whereupon, a discussion was held off the record commencing at 2:56 p.m.)

(Proceedings resumed at 3:06 p.m.:)

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

And so we have distributed Exhibits 5 and 6.

BY MR. GRUEN:

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

Did I understand that right?

WITNESS NEVILLE: Yes.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Okay.

WITNESS NEVILLE: So --

BY MR. GRUEN:

Q. Understood.

WITNESS NEVILLE: -- just to make that clarification.

BY MR. GRUEN:

Q. That's helpful.

WITNESS NEVILLE: Okay.

BY MR. GRUEN:

Q. Understood.

Can you . . .

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

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

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

WITNESS NEVILLE: High level?

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

BY MR. GRUEN:

Q. Yeah.

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

BY MR. GRUEN:

Q. Okay.

WITNESS NEVILLE: So high level --

BY MR. GRUEN:

Q. Yes.

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

BY MR. GRUEN:

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

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

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

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

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

Do you know?

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. I follow.

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

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

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

4.1.1 says, quote(reading):

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

And "Storage Engineering's" in bold.

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

Let's go off the record a moment.

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

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

MR. GRUEN: Back on the record.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

WITNESS NEVILLE: Drilling.

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

Q. Okay.

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

moment.

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

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Understood. Thank you.

Okay. With regards to . . .

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

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

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

BY MR. GRUEN:

Q. Understood.

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

Do you recall?

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

MR. GRUEN: Okay. Understood.

Let's go off the record a second.

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

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

MR. GRUEN: Back on the record.

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

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

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

MR. SHER: Sure.

EXAMINATION (RESUMED)

BY MR. SHER:

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

Did I get that right?

WITNESS EGBERT: I'm not sure.

BY MR. SHER:

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

WITNESS EGBERT: Yes.

BY MR. SHER:

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

WITNESS EGBERT: Correct.

BY MR. SHER:

Q. -- Reservoir Engineering?

WITNESS NEVILLE: Reservoir Engineering.

WITNESS EGBERT: I recall now, yes.

BY MR. SHER:

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

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

MR. SHER: Okay. Understood. Thank you.

EXAMINATION (RESUMED)

BY MR. GRUEN:

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

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

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

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

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

WITNESS EGBERT: Um-hmm.

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Yes.

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

And . . . that's what I recall.

BY MR. GRUEN:

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

WITNESS EGBERT: Yes.

BY MR. GRUEN:

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

So, for example, 4.2.1 states (reading):

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

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

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

I do recall him spending considerable time --

BY MR. GRUEN:

Q. Yeah.

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

BY MR. GRUEN:

Q. Okay. Understood.

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

pressure, then; is that correct?

WITNESS EGBERT: Not quite.

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Okay. And was the . . .

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

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

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

BY MR. GRUEN:

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

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Yes, please.

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

BY MR. GRUEN:

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

WITNESS EGBERT: One might say that, yes.

BY MR. GRUEN:

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

WITNESS EGBERT: Absolutely.

BY MR. GRUEN:

Q. Okay. I follow.

And was the . . .

Was the field gauge kept, to your knowledge?

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

BY MR. GRUEN:

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

WITNESS EGBERT: I don't know.

MR. GRUEN: Okay. Okay.
Go ahead.

EXAMINATION (RESUMED)

BY MR. SHER:

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

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

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

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

BY MR. SHER:

Q. You mentioned that accurate gauges are used.

WITNESS EGBERT: (Nodding head.)

BY MR. SHER:

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

WITNESS EGBERT: I believe so, yes.

BY MR. SHER:

Q. Do you know how regularly they are checked?

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

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

BY MR. SHER:

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

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

WITNESS EGBERT: Yes.

BY MR. SHER:

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

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

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

MR. SHER: Thank you.

(Pause in proceedings.)

EXAMINATION (RESUMED)

BY MR. GRUEN:

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

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

BY MR. GRUEN:

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

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

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

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

BY MR. GRUEN:

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

WITNESS EGBERT: (Examining document.)

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

BY MR. GRUEN:

Q. Yeah, I -- I think so.

WITNESS EGBERT: And -- And so --

BY MR. GRUEN:

Q. Let me just be sure.

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

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

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: So --

BY MR. GRUEN:

Q. Go ahead.

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

BY MR. GRUEN:

Q. Uh-huh.

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

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

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

BY MR. GRUEN:

Q. Sure.

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

BY MR. GRUEN:

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

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

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

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

BY MR. GRUEN:

Q. Okay.

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

BY MR. GRUEN:

Q. All right. Understood.

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

MR. GRUEN: Understood. That's helpful. Okay. Thank you.

(Pause in proceedings.)

MR. GRUEN: Go ahead.

EXAMINATION (RESUMED)

BY MS. ROSE:

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

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

Or let me rephrase.

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

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

BY MS. ROSE:

Q. Okay.

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

BY MS. ROSE:

Q. Okay.

WITNESS EGBERT: -- quite a bit.

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

BY MS. ROSE:

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

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

BY MS. ROSE:

Q. Okay.

WITNESS EGBERT: They -- They -- Such

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

MS. ROSE: Okay.

MR. GRUEN: Thank you.

Turning to Exhibit -- Oh.

EXAMINATION (RESUMED)

BY MR. SHER:

Q. Just before we move from Exhibit Number 5.

If we look at the policy section, 1.1.

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

Do you see those?

WITNESS EGBERT: Yes.

BY MR. SHER:

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

WITNESS EGBERT: Well, I certainly held that position.

BY MR. SHER:

Q. Which would that be?

WITNESS EGBERT: Storage Field Engineer.

BY MR. SHER:

Q. Okay.

WITNESS EGBERT: One of . . .

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

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

WITNESS NEVILLE: Yeah, you do.

WITNESS EGBERT: I'm sorry. I have that backwards.

Operations Manager.

Storing Engineer Manager would have been Amy Kitson; right?

WITNESS NEVILLE: (Nodding head.)

WITNESS EGBERT: And then Storage Operations Manager . . .

WITNESS NEVILLE: That would have been -- Isn't it Tim Bomberger?

WITNESS EGBERT: At that time --

WITNESS NEVILLE: Or was it Glenn --

WITNESS EGBERT: -- it was Glenn --

WITNESS NEVILLE: It was Glenn.

WITNESS EGBERT: It was Glenn LaFevers.

MR. SHER: Glenn LaFevers.

Thank you both.

EXAMINATION (RESUMED)

BY MR. GRUEN:

Q. Turning to Exhibit 6 briefly, really, Page 1 of 10.

So this is the Routine Well Kills document, Company Operations Standard Gas Operations. In the upper right corner, it's 224.045.

So, I'm looking at 1.1 under Planning, "Prior to" -- which says, in part (reading):

"Prior to killing the well, review the Well File and discuss kill with the Storage Field Engineer to ensure that a means of pressure communication exists between the tubing and tubing casing annulus, scheduling required wireline work prior to all killing operations."

So, as the Storage Field Engineer, Mr. Egbert --

Do you want to take a moment to digest that?

WITNESS EGBERT: I'm okay.

BY MR. GRUEN:

Q. Okay. So, as the Storage Field Engineer, do you know who reviewed -- Did -- Was this part -- First

of all, let me ask:

Was this part applicable at -- I see it says "routine well kill" and I know you described it as an emergency well kill --

WITNESS EGBERT: Um-hmm.

BY MR. GRUEN:

Q. -- the well kill attempt. So if this document isn't applicable, I won't go down this line of questioning.

So I guess my first question is: Is the routine well kill document applicable for the first two well kill attempts?

WITNESS EGBERT: I -- I -- I think, in part, yes.

BY MR. GRUEN:

Q. And can you say more about why it is?

WITNESS EGBERT: Well, it provides direction and killing of gas storage well.

Some . . . Some facets of it do not apply. The facets relating to routine well kills may not -- may not apply. But much of it does --

BY MR. GRUEN:

Q. Understood.

WITNESS EGBERT: -- for an emergency well kill.

BY MR. GRUEN:

Q. Does it apply to the requirement to schedule -- I'm looking at the last part of Section 1.1 that says, "Scheduling required wireline work prior to well killing operations."

WITNESS EGBERT: Yes.

BY MR. GRUEN:

Q. Is that part applicable, in your mind?

WITNESS EGBERT: Yes.

BY MR. GRUEN:

Q. Okay. And, so, in terms of the . . .

To your knowledge -- Well, let me just ask:

What -- Can you explain at a high level what required wireline work is.

WITNESS EGBERT: Sure.

BY MR. GRUEN:

Q. Please.

WITNESS EGBERT: So, 1.1 states that (reading):

"Prior to killing the well, review the Well File and discuss kill with the Storage Field Engineer to ensure that a means of pressure communication exists between the tubing and the tubing casing annulus . . ."

BY MR. GRUEN:

Q. Yes, sir.

WITNESS EGBERT: In the case of SS-25, we knew that -- already that the sliding sleeve was open and that communication between the tubing and the tubing casing annulus did exist.

BY MR. GRUEN:

Q. Yes, sir.

WITNESS EGBERT: So the subsequent sentence, "scheduling required wireline work," that refers to situations where the sleeve might be closed --

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: -- and wireline work is required to open the sleeve. The sleeve has to be open in order to circulate fluids between the tubing and the casing.

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: So in the case of the SS-25, its sleeve was already open so no wireline work was required.

BY MR. GRUEN:

Q. Thank you.

Are you familiar with -- Were you consulted about the -- the Well File review that's called out in Section 1.1 as well?

WITNESS EGBERT: My understanding at the time is that Todd Van de Putte and Alan Fortenberry had already consulted the Well File in their preparation for the kill.

BY MR. GRUEN:

Q. Understood.

WITNESS EGBERT: And that they . . . And that they had the information they needed to complete their plan.

BY MR. GRUEN:

Q. Okay. Okay. I want to step away from the -- the two standards for a second and just touch on something you said this morning about the tubing kill or well kill one and the casing well kill two.

And my understanding is, when the tubing kill didn't work, then, under Mr. -- supporting Mr. Fortenberry, you supported him to attempt the casing kill.

Did I follow that correctly?

WITNESS EGBERT: I believe so, yes.

BY MR. GRUEN:

Q. Okay. And, to your knowledge, why didn't the

tubing kill work?

WITNESS EGBERT: My knowledge at the time?

BY MR. GRUEN:

Q. Yes, sir.

WITNESS EGBERT: I didn't know.

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: It was really . . . I guess I can speak for myself only. I didn't know why --

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: -- the pump locked up and the flow stopped during the tubing kill.

BY MR. GRUEN:

Q. And if memory serves, we understood from Mr. Fortenberry that I think it was approximately 19 barrels of kill fluid had been used for the tubular kill --

WITNESS EGBERT: Um-hmm.

BY MR. GRUEN:

Q. -- if -- if I'm tracking right.

Did the use of that amount of kill fluid -- which I understood, too, was given the calculations

that had been performed -- was less than the approximated kill fluid that was thought to be needed --

WITNESS EGBERT: Um-hmm.

BY MR. GRUEN:

Q. -- to complete the well --

WITNESS EGBERT: Right.

BY MR. GRUEN:

Q. -- kill.

Did the use of only 19 barrels at the time give you any indication of what hadn't worked?

WITNESS EGBERT: Well, at the time, my thinking was that the -- that volume of fluid was an indication of the depth of whatever the restriction was down-hole.

And at that time, we didn't know what that restriction was, but that -- that pointed to the depth of the restriction.

BY MR. GRUEN:

Q. Did you have -- Prior to beginning to inject the kill fluid into the tubular -- into the tubing -- excuse me -- did you know whether the restriction was there?

WITNESS EGBERT: No.

BY MR. GRUEN:

Q. Could it have been found out whether the restriction was there prior to installing the kill fluid --

WITNESS EGBERT: I --

BY MR. GRUEN:

Q. -- into the tubing?

WITNESS EGBERT: I -- I -- I don't know.

MR. GRUEN: Okay. Okay.

EXAMINATION (RESUMED)

BY MR. SHER:

Q. If, for example, the sleeve was closed and so one needed to use wireline equipment --

WITNESS EGBERT: (Nodding head.)

BY MR. SHER:

Q. -- would one have noticed, in using -- trying to use the wireline equipment, that it couldn't go down to open the sleeve?

WITNESS EGBERT: Yes.

BY MR. SHER:

Q. But there was no need to do that because the sleeve was open.

WITNESS EGBERT: Yeah. Under normal circumstances, if the sleeve were closed and you wanted

to kill a well, you would first open the sleeve.

And during that operation, if there was restriction in the tubing, you definitely would learn that in that -- during that process because the wireline would stop at that point.

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

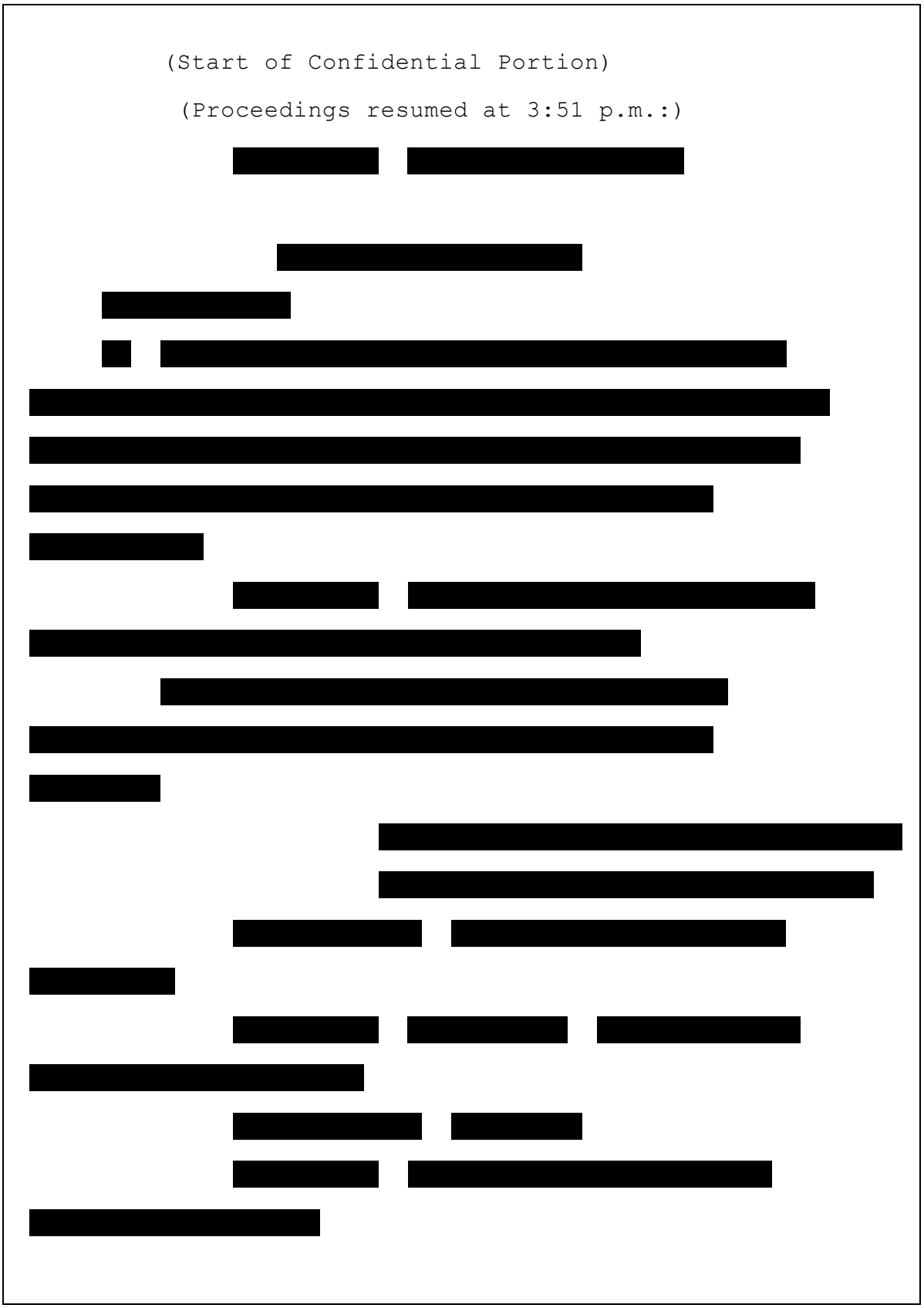
(The following pages 192 through 199 are confidential.)

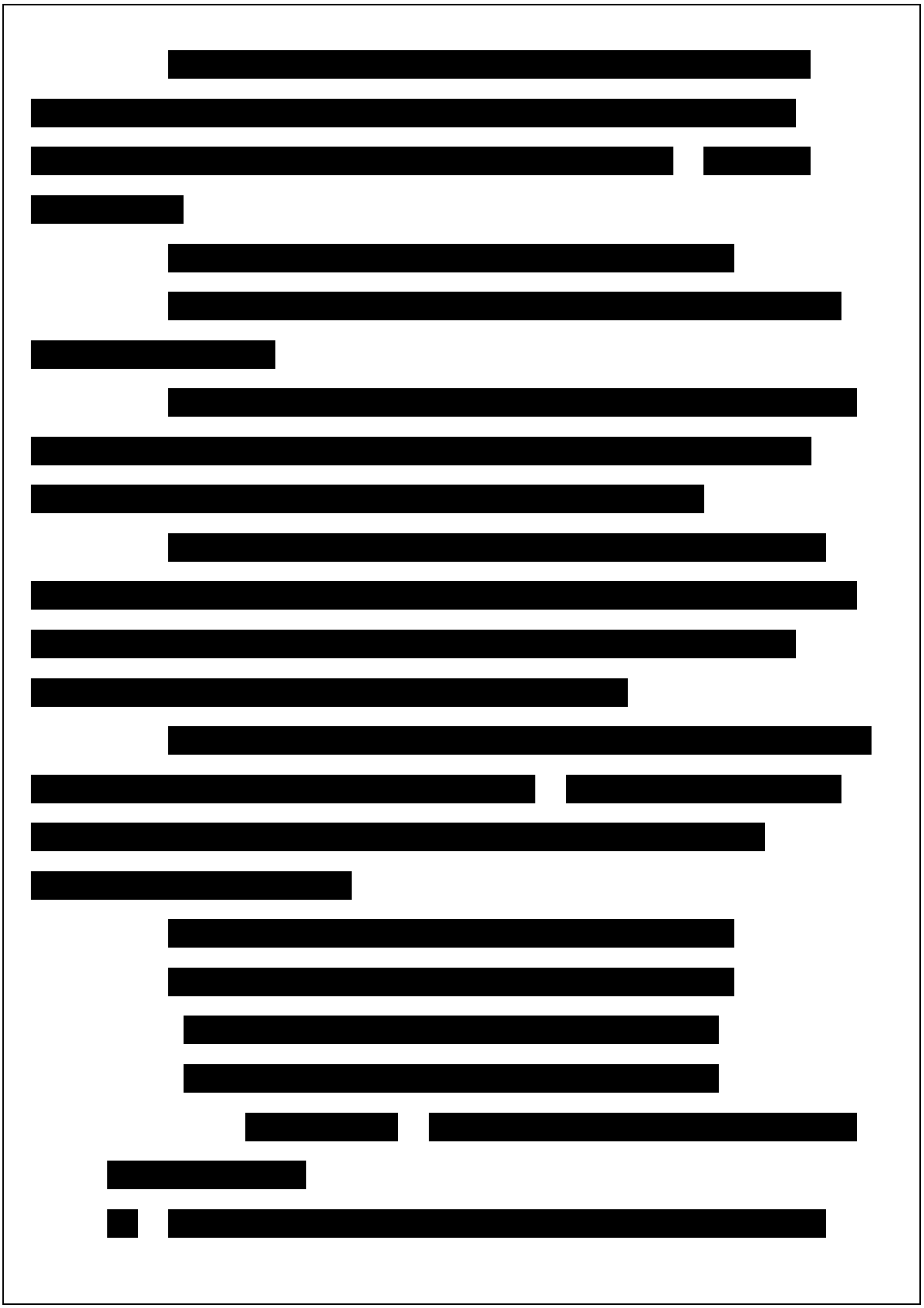
(Whereupon, a discussion was held off the record commencing at 3:50 p.m.)

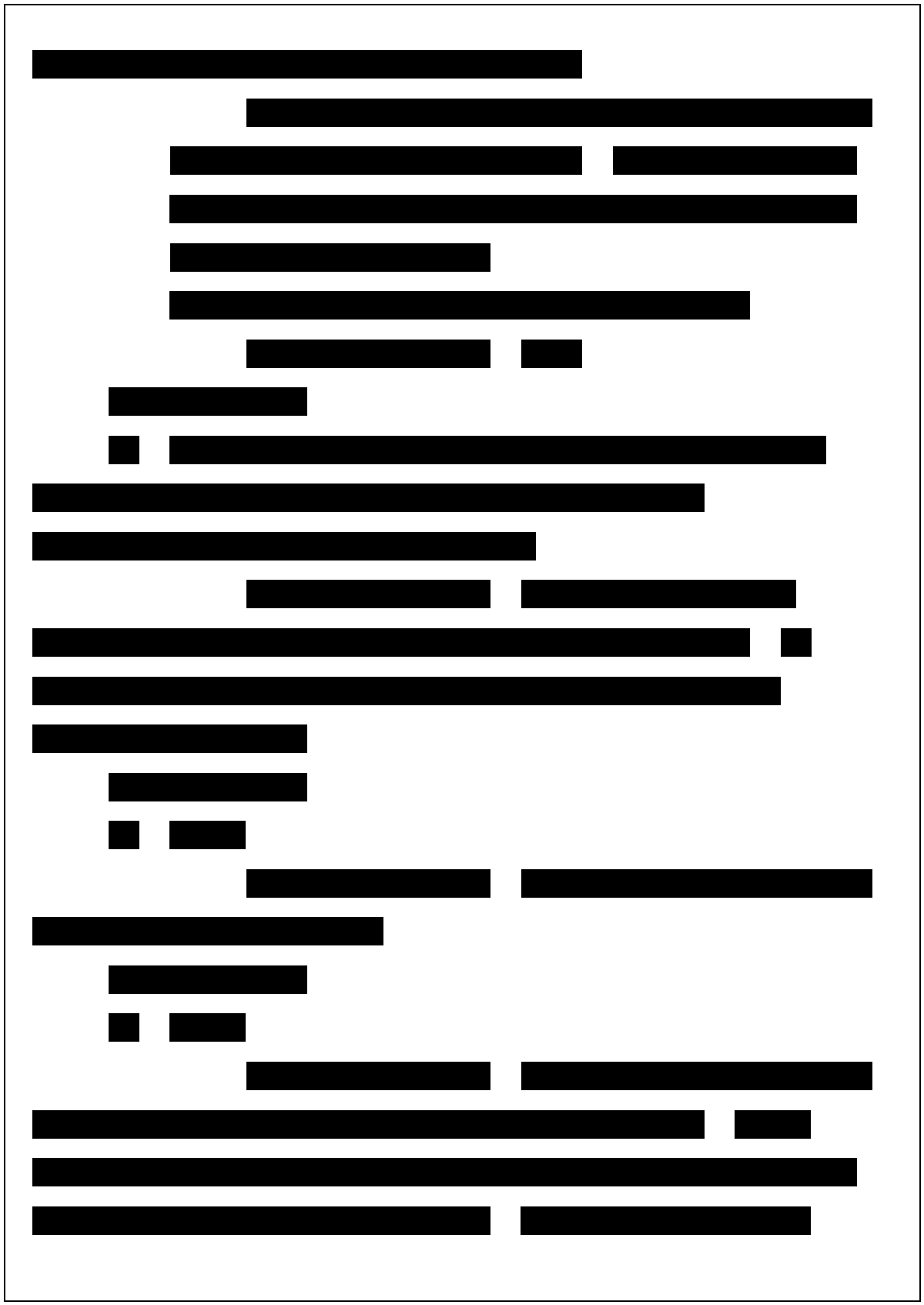
///

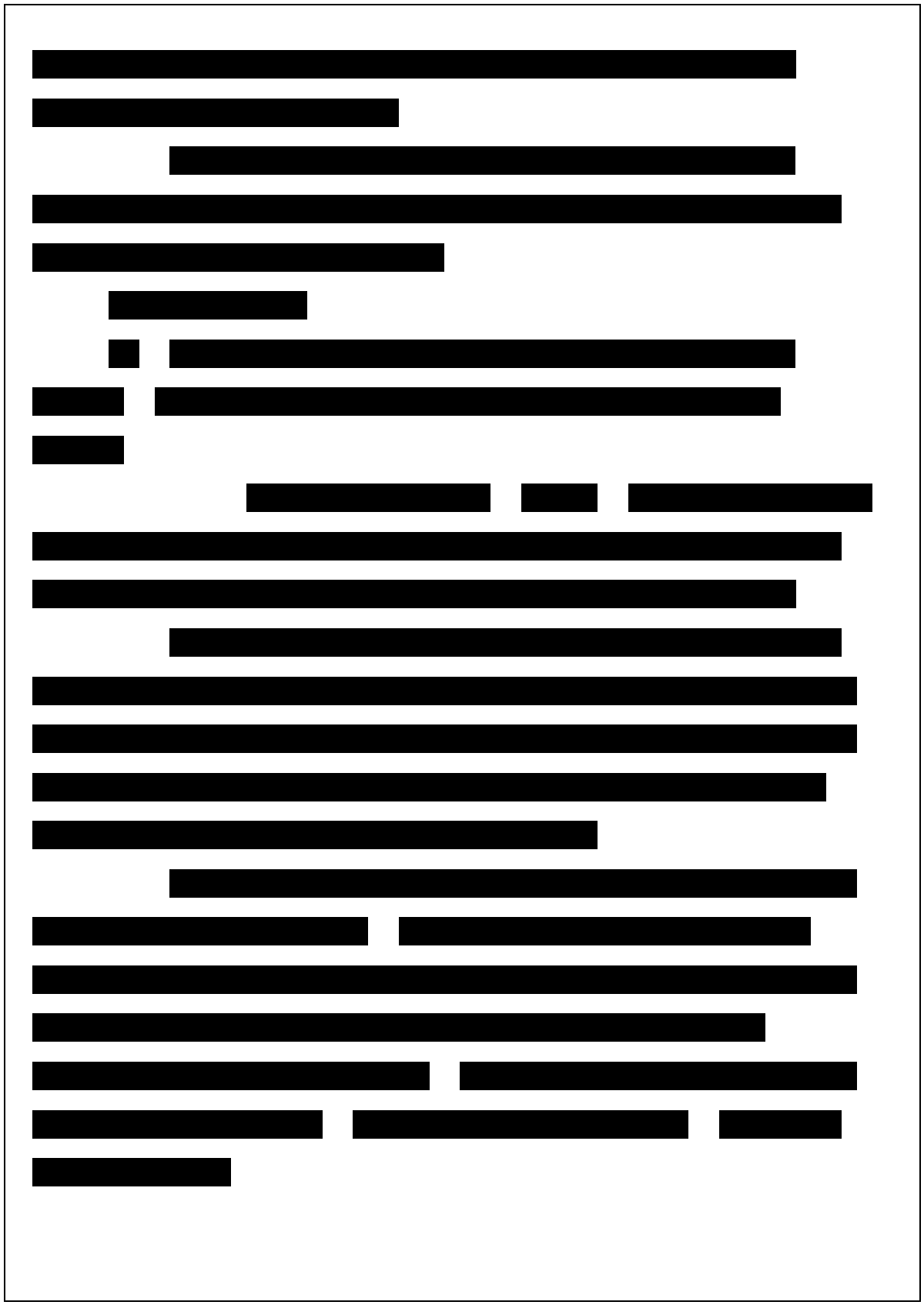
(Start of Confidential Portion)

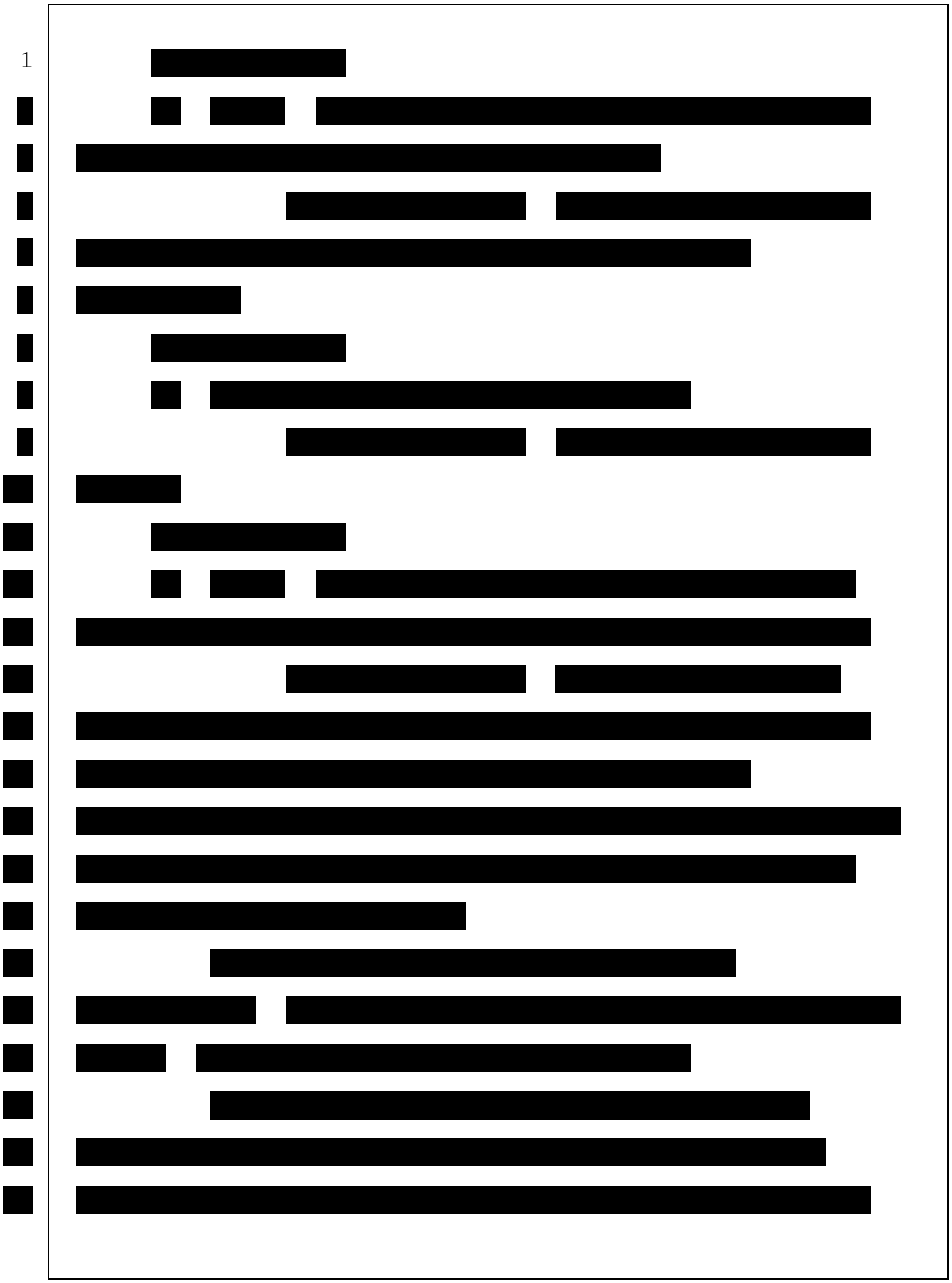
(Proceedings resumed at 3:51 p.m.:)

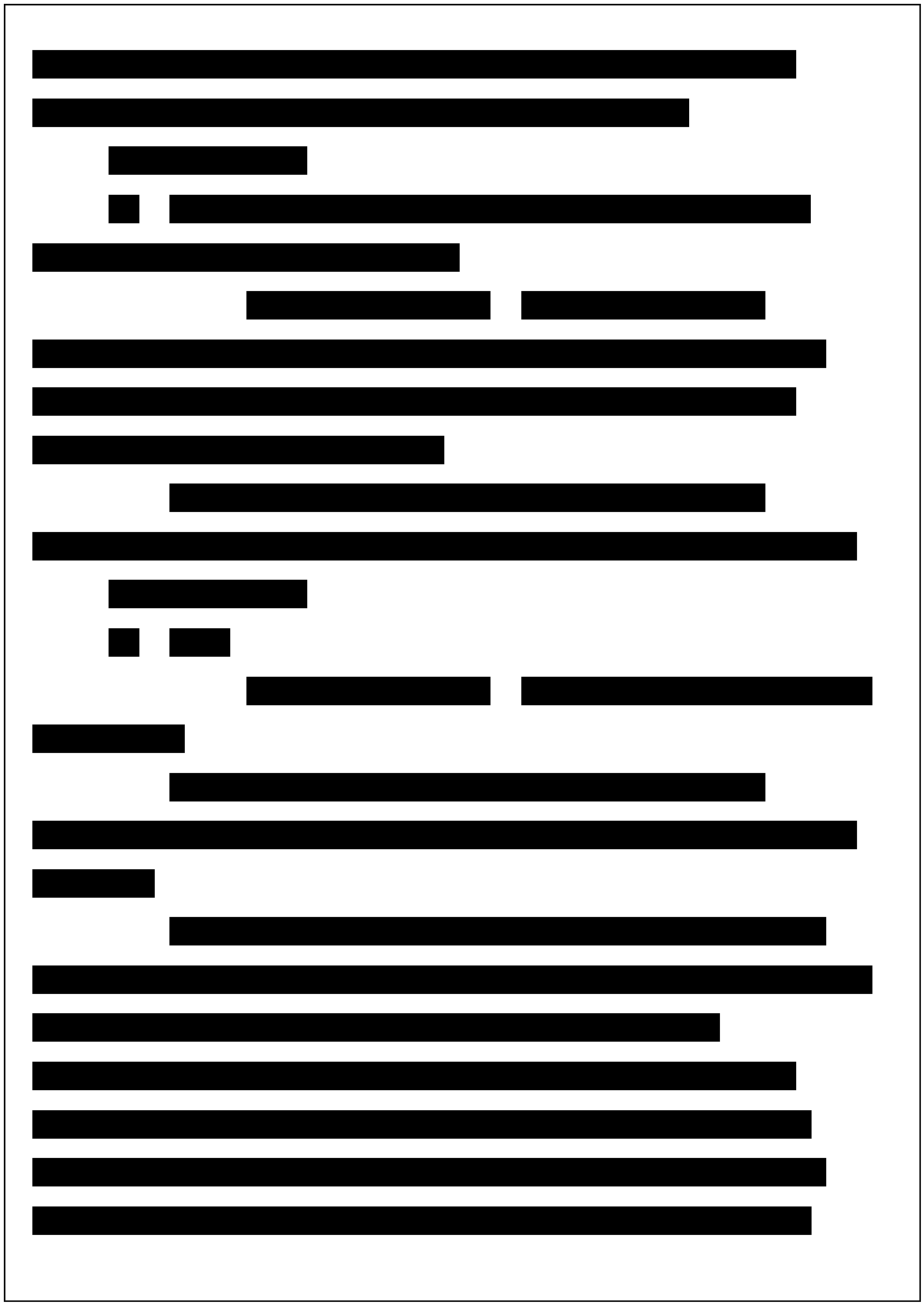


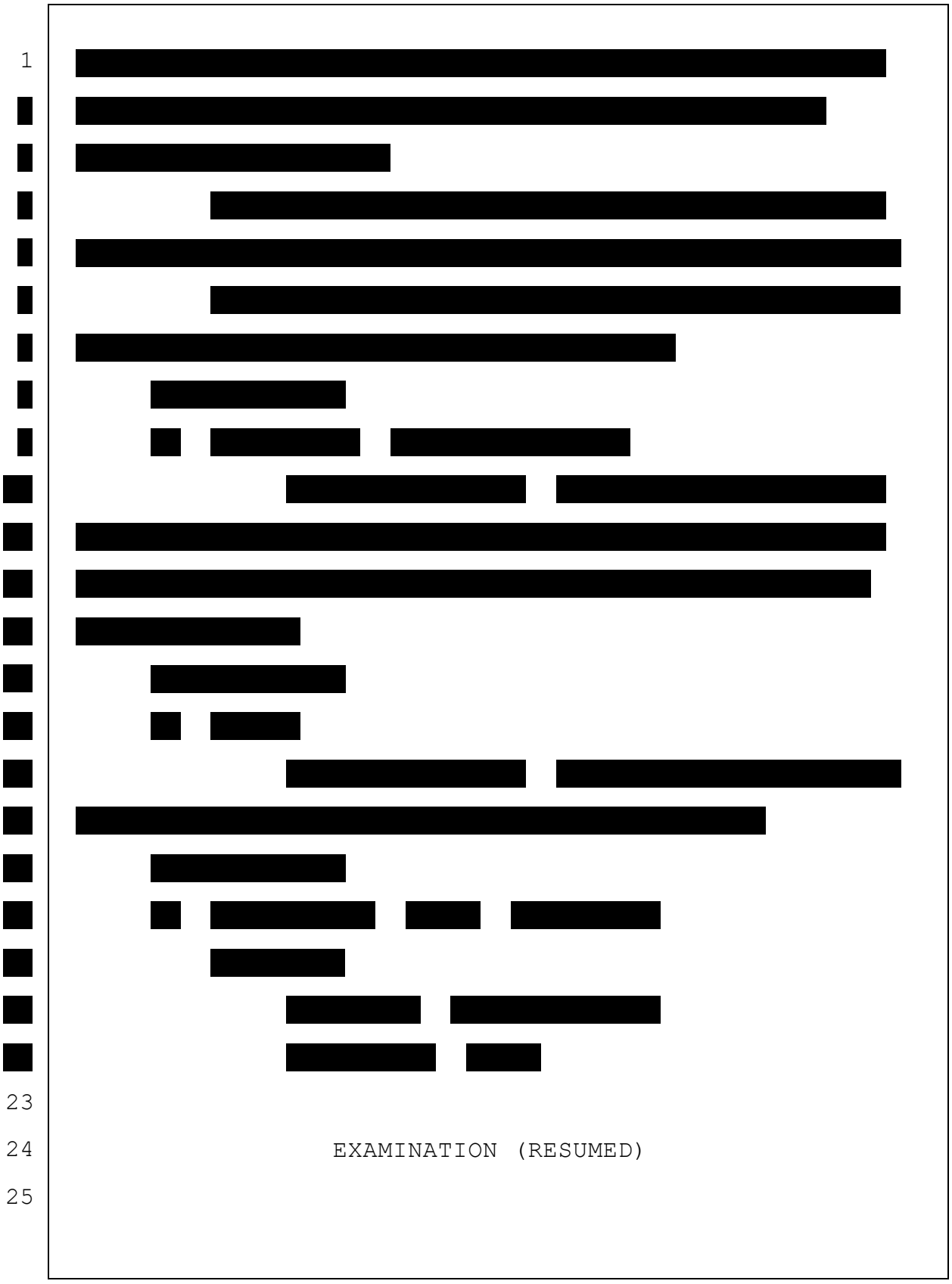












EXAMINATION (RESUMED)

[redacted]

(End of Confidential Portion)

///

(Continuation of Non-Confidential Testimony)

EXAMINATION (RESUMED)

BY MR. GRUEN:

Q. We're almost at the time, and if you'll indulge me, I think, Mr. Egbert, just a couple of quick questions about the work with Mr. Fortenberry --

WITNESS EGBERT: Sure.

BY MR. GRUEN:

Q. -- your supporting role for him.

He had used a term yesterday where he talked about -- I believe it was reenergizing the well seal on SS-25.

Does -- Are you familiar with the term "reenergize" -- the phrase "reenergizing the well seal"?

WITNESS EGBERT: Yes.

BY MR. GRUEN:

Q. Okay. And were you present for the effort to reenergize the well seal?

WITNESS EGBERT: I was.

BY MR. GRUEN:

Q. Were you part -- Were you in the supporting role for Mr. Fortenberry.

WITNESS EGBERT: I was in a supporting

role and in a position to observe the work occurring. I may not have been there the entire time, but at least part of the time when Cameron was energizing the seals, I was present.

BY MR. GRUEN:

Q. Yes. Okay. And could any of the work reenergizing the well seal have contributed to the blockage in the tubing or the obstruction that -- that occurred during the -- the injection of fluid into the tubing during the first well kill attempt?

WITNESS EGBERT: So, you're asking my opinion as of now whether I think doing that then could have caused the tubing blockage?

BY MR. GRUEN:

Q. I think I am, yes.

WITNESS EGBERT: I can't think of a way that it would.

BY MR. GRUEN:

Q. Okay. Okay. That's helpful. Thank you.

In addition -- Separate from the reenergizing of the well, are you aware of any work that was performed on SS-25 in an attempt to stop the leak before Mr. Fortenberry arrived on-site?

WITNESS EGBERT: No, I'm not aware of any work prior to the well kill in an attempt to stop the

leak, no.

BY MR. GRUEN:

Q. Okay. And I'm asking you in -- My understanding is, really, you were the one of the first people on site, not that you discovered the leak, but that you were really one of the first lead people working on -- on -- on addressing or perhaps mitigating the leak.

Am I understanding that correctly?

WITNESS EGBERT: I'm not sure. I don't know.

I believe Todd and Alan were on -- at Aliso Canyon at the time, but when I first arrived at the well, I didn't see them there.

BY MR. GRUEN:

Q. Anyone else who you think might have been working on mitigating the leak before you? Is there anyone you can identify for us?

WITNESS EGBERT: Well, I don't think there were any attempts to mitigate the leak.

BY MR. GRUEN:

Q. Maybe I should -- Maybe I should -- I stand corrected. Thank you. Maybe I should use the term "stop the leak."

WITNESS EGBERT: I don't think anybody,

prior to the well kill, was trying to stop the leak.

BY MR. GRUEN:

Q. Okay.

WITNESS EGBERT: We . . . Other than the energizing of the wellhead seals.

BY MR. GRUEN:

Q. Yes, sir.

WITNESS EGBERT: One theory that was floated was that one of the seals was passing gas, and Cameron was called out in order to make that determination whether or not the seals were passing.

BY MR. GRUEN:

Q. Yes, sir.

WITNESS EGBERT: That -- That's the only attempt to mitigate or stop the leak that occurred prior to the well kill, to my knowledge.

MR. GRUEN: Understood. Thank you.

Anyone else?

Okay. Thank you both very much.

You are -- You were required to answer our questions, but we appreciate your -- your time and effort and insight in helping with our pre-formal investigation. So we appreciate that. We appreciate you coming here.

And, with that, that concludes the Examination

Under Oath for today and you're both excused.

WITNESS EGBERT: Terrific. Thank you.

WITNESS NEVILLE: Thank you.

MR. GRUEN: Off the record.

(Proceedings adjourned at 4:08 p.m.)

State of California)
)
County of San Francisco)

I, Candace L. Yount, Certified Shorthand Reporter for the State of California, County of San Francisco, do hereby certify:

That I was present at the time of the above proceedings;

That I took down in machine shorthand notes all proceedings had and testimony given;

That I thereafter transcribed said shorthand notes with the aid of a computer;

That the above and foregoing is a full, true, and correct transcription of said shorthand notes, and a full, true and correct transcript of all proceedings had and testimony taken;

That I am not a party to the action or related to a party or counsel;

That I have no financial or other interest in the outcome of the action.

Dated: November 18, 2018

Candace L. Yount, CSR No. 2737