

SED-310
SoCalGas Response to SED Data Request 120
I.19-06-016
ALJs: Hecht/Poirier
Date Served: May 17, 2021

**ORDER INSTITUTING INVESTIGATION ON THE COMMISSION'S OWN MOTION INTO THE
OPERATIONS AND PRACTICES OF SOUTHERN CALIFORNIA GAS COMPANY WITH
RESPECT TO THE ALISO CANYON STORAGE FACILITY AND THE RELEASE OF
NATURAL GAS, AND ORDER TO SHOW CAUSE WHY SOUTHERN CALIFORNIA GAS
COMPANY SHOULD NOT BE SANCTIONED FOR ALLOWING THE UNCONTROLLED
RELEASE OF NATURAL GAS FROM ITS ALISO CANYON STORAGE FACILITY
(I.19-06-016)**

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SED-SCG-120 DATED NOVEMBER 16, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 19, 2020

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated November 16, 2020 in I.19-06-016. The Responses are based upon the best available, nonprivileged information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request, and within SoCalGas' possession, custody, or control. SoCalGas' responses do not include information collected or modeled by Blade Energy Partners' during its Root Cause Analysis Investigation. SoCalGas reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

SoCalGas objects to the instructions submitted by SED and to the continuing and indefinite nature of this request on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature and continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(d) and 030.060(g), respectively. SoCalGas will provide responsive documents in existence at the time of its response. Should SED seek to update its request, SoCalGas will respond to such a request as a new data request in the future.

SoCalGas submits these Responses, while generally objecting to any Request that fails to provide a defined time period to which SoCalGas may tailor its Response, and to the extent that any Request is overly broad, vague, ambiguous, unduly burdensome, assumes facts, or otherwise fails to describe with reasonable particularity the information sought. SoCalGas further submits these Responses without conceding the relevance of the subject matter of any Request or Response. SoCalGas reserves the right to object to use of these Responses, or information contained therein, in any dispute, matter or legal proceeding. Finally, at the time of this Response, there are no pending oral data requests from SED to SoCalGas.

For this question, please refer to the following, which is a quote of SED Data Request 119, Question 6 and the response to that question.

QUESTION 6:

Referring to page 4:16-18, which states, "Dispatch took the information provided and developed the MCR. Note that dispatch does not have technical expertise, and certainly not with respect to well control operations." Also referring to page 4:8-10, which states, "The text message to which Ms. Felts refers is a Message Center Report (MCR) issued on November 13, 2015 at 3:00 p.m. which states, "[d]uring the repair process to mitigate the Leak at the well head in Aliso Canyon,

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oil was extracted and vented into the atmosphere.” With these passages in mind, please answer:

- a. Precisely how did dispatch know to state in the Message Center Report that “oil was extracted and vented into the atmosphere.”?

RESPONSE 6:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “how did dispatch know to state.” SoCalGas further objects to this request on the ground it calls for speculation. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas is not currently able to pose this question to the Dispatcher.
[End of Response]

With SED Data Request 119, Question 6 and SoCalGas’ response to that question in mind, please answer the following:

QUESTION 1:

Provide all recordings of communications with dispatch, including radio and phone recordings, related to the “Message Center Report (MCR) issued on November 13, 2015 at 3:00 p.m. which states, “[d]uring the repair process to mitigate the Leak at the well head in Aliso Canyon, oil was extracted and vented into the atmosphere.”

RESPONSE 1:

SoCalGas objects to this request as unduly burdensome under Rule 10.1 of the Commission’s Rules of Practice and Procedure, particularly because a response has been requested within 3 calendar days of issuance of the request. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the phrase “related to.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas searched through recordings for the relevant dispatchers, for the period November 13, 2015 between 1:00-5:00 PM, and was not able to locate the recording.

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SOCALGAS RESPONSE DATED NOVEMBER 19, 2020

QUESTION 2:

If SoCalGas possesses transcripts of the recordings requested in question 1 as of the time it received this data request, please provide them.

RESPONSE 2:

SoCalGas objects to this request as unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, particularly because a response has been requested within 3 calendar days of issuance of the request. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas was not able to locate a transcript.

QUESTION 3:

For question 3, please refer to the following passages in the "Prepared Supplemental Rebuttal Testimony of Glenn La Fevers on Behalf of Southern California Gas Company, dated October 26, 2020. Page 3, lines 8 through 11 of Mr. LaFever's testimony states:

"Representatives from the Division of Oil, Gas and Geothermal Resources (DOGGR, presently known as the California Geologic Energy Management or CalGEM) were present at Aliso Canyon during the well kill attempt on November 13, 2015." [Footnote omitted.]

Page 4 of Mr. LaFever's testimony, lines 8 through 10 states,
"The text message to which Ms. Felts refers is a Message Center Report (MCR) issued on November 13, 2015 at 3:00 p.m. which states: "[d]uring the repair process to mitigate the Leak at the well head in Aliso Canyon, oil was extracted and vented into the atmosphere. [Footnote omitted]"

With these passages in mind, please answer the following question.

Provide the names of the people who were present at Aliso Canyon during the well kill attempt on November 13, 2015, and who witnessed the extracting and venting of oil into the atmosphere stated in the Message Center Report issued in November 13, 2015 at 3:00 p.m., which is the text message to which Ms. Felts refers.

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RESPONSE 3:

SoCalGas objects to this request as unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure, particularly because a response has been requested within 3 calendar days of issuance of the request. SoCalGas also objects to this request as unduly burdensome on the ground the information sought is equally available to SED, as referenced within the question. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. The following DOGGR personnel were present at Aliso Canyon during the well kill attempt on November 13, 2015.: Kris Gustafson, Bruce Hesson, Scott McGurk, and Scott Walker.