

SoCalGas-20

Exhibits to Prepared Reply Testimony of Gregory Healy (March 20, 2020)

I.19-06-016

ALJs: Hecht/Poirier

Date Served: March 12, 2021

Ex. IX-1



January 31, 2016

Southern California Gas Company
555 W. 5th Street, GT21C3
Los Angeles, California 90013

Attn: Mr. Jimmie Cho, Senior Vice President

Subject: Blade RCA Information Request - SS25 & P39 Well Files.

This letter is a Blade Energy Partners request to SoCalGas for information and files pursuant to the Aliso Canyon RCA Project. Blade requests that the following be provided as soon as possible in electronic file format to Bill Whitney or me at the earliest possible time.

Incident Well SS25

- Complete well file with history from before first ever spudding of the Aliso Canyon leaking well through January 31, 2016, to include geologic & geophysical, basis of design, rig & service company daily field reports, all tubular (casing & tubing), fluids and cementing, downhole completion tools (including packers), wellhead, and flowline information. Include all interventions (slickline, electric, and stranded wireline, coiled tubing, through tubing) and kill attempts and washouts, stimulation, chemical injection treatments, inhibitors, pressure tests, logs or other integrity assessment tests.
- Complete production & injection history records from date of first use thorough all production, injection, shut-in and other periods - covering production & injection rates (gas, oil, water), wellhead and casing head pressures & temperatures, days & times & elapsed periods of each rate tested through a test separator or how estimated, bottomhole pressures/temperatures when surveyed, notes when well was shut-in and why.
- Composition and chemistry of well production and injection fluids/solids, including hydrocarbon and non-hydrocarbon and water analyses, and source of sampling with sampling conditions. Non-hydrocarbons besides water may include sand, minerals, corrosives (H₂S, CO₂), and added odorizers (mercaptans).

- Well schematics and general histories of adjacent or analog field wells and those wells' remediation issues, if any.
- Field structure maps, formation tops, and well geologic correlation. Subsurface lithologies and location of all natural water and hydrocarbon zones for the leaking well and all wells adjacent to it 360deg.
- Listing of all Aliso Canyon wells with date of their original drilling and running casing, and whether these other wells are still in use, have been shut semi-permanently (before 01Jan15) yet not plugged, or the date plugged, if plugged.
- Package of information provided to regulators to date.

Relief Well P39

- SoCalGas' complete:
 - well files,
 - daily operations/drilling reports,
 - service company reports & supplier invoices,
 - all the above - historically from original well drilling, and,
 - all the above - on a daily continuing basis until further notice.

Thank you & Regards,
 Blade Energy Partners, Ltd.
 Bob Pilko
bpilko@blade-energy.com; c: +1.832.202.7341

copy:
 Bill Whitney, Blade Energy Partners
bwhitney@blade-energy.com; c: +1.832.971.9555

Ex. IX-2



February 19, 2016

Southern California Gas Company
555 W. 5th Street, GT21C3
Los Angeles, CA 90013

Attn: Ms. Jill Tracy

Subject: Blade RCA Data Request

Dear Ms. Tracy:

We are going through the reports available on DOGGR websites, and the data provided by SoCalGas on Wells 25, 25A and 25B. Your data files contain a lot of valuable data. We await response to our last data request. This is a supplemental data request. Please get us the data as they come in, we will track it.

Blade requests the following.

1. Please provide us with the Earth Vision model for the field. We will access it using the Earth Vision software. This model will contain all relevant geologic data regarding the field. Further it will allow us to visualize the three dimensional geology of the field, especially with regards to the structure, faulting and well geometries.
 - a. If there are any reservoir simulation studies or models, please provide them too.
2. Please provide a plat of SS25 Location showing the 3 wells and the following:
 - a. Well centers and distances between well centers, and the outline of the covers on 25A and 25B.
 - b. Edges of the flat part of the location including the entrance road.
 - c. Scaled drawing hard copy (minimum 11"x17") and electronic copy.
3. We understand that a CBL log was run in the well around May 26th 1973. Please provide a copy of that log.
4. Please provide a complete well file for SS5. If possible, please provide the data in a chronological order. If this slows the process of compiling the data, please provide it as you have it.
5. Please provide a complete well file for SS4-0. If possible, please provide the data in a chronological order. If this slows the process of compiling the data, please provide it as you have it

Thank you and Regards,

Ravi Krishnamurthy, Blade Energy Partners

2600 Network Boulevard, Suite 550 Frisco, TX 75034 □Telephone □1 972.712.8407 □Fax □1 972.712.8408

Ex. IX-3



April 7, 2016

Southern California Gas Company
555 W. 5th Street, GT21C3
Los Angeles, CA 90013

Attn: Ms. Jill Tracy

Subject: Blade RCA Data Request

Dear Ms. Tracy:

Thank you for all the data already provided. Based on that ongoing review, we have some additional data requests.

- 1) In AC_BLD_0003625 Injection Schedule:
 - A. What do the terms T, C, TK and CK mean in the STR column?
 - B. Under the AVAIL. PRIOR. columns, there are numbers (e.g., "Y 1", "Y 2"). Do these refer to the priority of the wells for injection? We assume that wells are opened in the order of priority (e.g., first 1, then 2, and so on to 6). Is this correct?
- 2) In AC_BLD_0003626 Withdrawal Schedule:
 - A. Under the AVAIL. PRIOR. columns, there are numbers (e.g., "Y 1", "Y 2"). Do these refer to the priority of the wells for withdrawal? We assume that wells are opened in the order of priority (e.g., first 1, then 2, and so on to 6). Is this correct?
 - B. Under RATE column, what is the number shown? Does this refer to the maximum withdrawal rate for that well? Are the proper units MMscf/d (instead of MMCF shown in the table?
 - C. Please explain the following comment at the bottom of the schedule: "Red Flag Event: Use wells starting with priority 3 through 6 to reduce liquid production."
- 3) AC_BLD_0003627 is a "Withdrawal Worksheet". Please provide the analogous "Injection Worksheet" if available.
- 4) In injection mode, is the injected gas measured and/or metered? If so, where and how?
- 5) In withdrawal mode, is the withdrawn gas measured and/or metered? If so, where and how?
- 6) What is the procedure for allocating injected gas to individual wells? Please provide a written procedure, if available.
- 7) What is the procedure for allocating withdrawn gas to individual wells? Please provide a written procedure, if available.
- 8) Please provide the complete well file Frew 3.
- 9) Please provide the complete well file for FF-34 and FF-34A.
- 10) Please provide the complete well file for Porter 38.
- 11) There are references to "sand testing" (e.g., AC_BLD_0003641):
 - A. What is the purpose of these tests?
 - B. Are these tests still being conducted? The references we have seen are from 1980s and 1990s.

- C. Please provide a sample procedure for the sand test.
 - D. Please provide a recent sand test data from SS-25 (or the closest well to SS-25).
 - E. Is sand production a problem with gas storage wells? If so, how is the produced sand handled? How much sand is produced?
- 12) There is a presentation on reservoir simulation study by SI International dated 10/2002. Is the reservoir simulation model available?
- 13) Well SS 25:
- A. We have received some of the gas measurements in the wellsite bore holes after SS25 seal; however can we have all of the data collected to date from these bore holes on SS25 site.
 - B. Need a copy of the temperature, noise and CBL log runs around 16-17 February 2016. Including gamma ray if run. Need the status of the well including tubing pressure, and 'A' annulus pressure when the logs were run.
 - C. Need well head and tree purchasing specifications. Should be included in the purchase order. Data needed includes complete description, manufacturer, serial numbers.
- 14) Please provide a complete well file for Frew 7.
- 15) Please provide the AECOM 3-D cloud point model, data along with drone pictures and video that was acquired as part of Phase I.
- 16) Please provide digital data either in ASCII or LAS formats the following log information:

Log Name or Type	Log Date	Open or Cased Hole	From (ft)	To (ft)	Comments
Schlumberger Electrical Log (SP and Resistivity)	13-Nov-53	Open	86	4,909	Combined Runs 1, 2, 3, 4
Schlumberger Electrical Log (SP and Resistivity)	14-Feb-54	Open	3,860	8,749	Combined Runs 5 (ST), 6, 7, 8, 9, 10, 11
Dresser Atlas Acoustic Cement Bond Log VDL	25-May-73	Cased	6,950	8,737	
Dresser Atlas Neutron Lifetime Log	25-May-73	Cased	8,000	8,742	
Dresser Atlas Compensated Density Log	28-May-73	Cased	8,000	8,560	
Dresser Atlas Acoustic Log	28-May-73	Cased	8,000	8,560	
Western Wireline Temperature Down	9-Nov-15	Cased	0	8,432	
Western Wireline Noise Temperature	9-Nov-15	Cased	0	8,432	

Thank you,

Best Regards,

Ravi Krishnamurthy, Blade Energy Partners

Ex. IX-4



□liso Can□bn RC□

February 18th, 2018

Southern California Gas Company
555 W. 5th Street, GT21C3
Los Angeles, CA 90013

Attn: Mr. Glenn La Fevers

Subject: Blade RCA Data Request

Dear Mr. La Fevers:

Thank you for all the data already provided.

This is a request for the well files, including the P&A daily reports, for the following wells.

Frew 6

Frew 7 (File was provided in April 2016. Please provide daily reports after April 2016)

Frew 8

Porter 47

Porter Sesnon 42

Sesnon Fee 3

Sesnon Fee 4

Sesnon Fee 6

Standard Sesnon 2

Standard Sesnon 13

Standard Sesnon 14 (File was provided in July 2016. Please provide daily reports after July 2016)

Standard Sesnon 17

Standard Sesnon 24

Standard Sesnon 30

Please provide the data by March 5th, 2018

Thank you,

Best Regards,

Ravi Krishnamurthy, Blade Energy Partners

Ex. IX-5

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED JANUARY 31, 2016**

SOCALGAS SUPPLEMENTAL RESPONSE DATED FEBRUARY 26, 2019

SoCalGas provides this information in response to the request for information from Blade Energy Partners, dated January 31, 2016. This information is based upon the best available non-privileged information known at this time, and is subject to change and/or supplementation as SoCalGas' investigation continues, and additional information becomes available.

DATA REQUESTS

Question 1:

Complete well file with history from before first ever spudding of the Aliso Canyon leaking well through January 31, 2016, to include geologic & geophysical, basis of design, rig & service company daily field reports, all tubular (casing & tubing), fluids and cementing, downhole completion tools (including packers), wellhead, and flowline information. Include all interventions (slickline, electric, and stranded wireline, coiled tubing, through tubing) and kill attempts and washouts, stimulation, chemical injection treatments, inhibitors, pressure tests, logs or other integrity assessment tests.

Response 1 (dated February 29, 2016):

Please see enclosed electronic document production set for copies of all documents comprising the active SS-25 well file, documents Bates range AC_CPUC_0000023 - AC_CPUC_0000759.

As to well SS-25A, please see enclosed electronic document production set for the active well file associated with well SS-25A, Bates range AC_CPUC_0000001 - AC_CPUC_0000011 and AC_CPUC_0000760 - AC_CPUC_0001198.

As to well SS-25B, please see enclosed electronic document production set for the active well file associated with well SS-25B, Bates Range AC_CPUC_0000012 - AC_CPUC_0000022 and AC_CPUC_0001199 - AC_CPUC_0001587.

Supplemental Response 1:

Please see enclosed the following documents:

SS-25	AC BLD 0067964 – AC BLD 0070652
SS-25A	AC BLD 0070653 – AC BLD 0073933
SS-25B	AC BLD 0073934 – AC BLD 0075723

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED JANUARY 31, 2016**

SOCALGAS SUPPLEMENTAL RESPONSE DATED FEBRUARY 26, 2019

The enclosed documents supplement the complete hard copy versions of the well files for SS-25, SS-25A, and SS-25B originally produced on February 8, 2016, and include electronic well file documents and/or well-related information to further assist Blade's investigation with a comprehensive, broad set of well-related information. While SoCalGas continues to keep its well files in hard copy, electronic versions of well file records are available in various digital repositories (e.g., WellView, UGS Servers). The hard copy well file consists of the following: (1) histories (2) logs, (3) surveys, and (4) invoices. The only repository SoCalGas digitizes well file information is WellView.

Please note that SoCalGas had previously supplemented its production of the well file for SS-25 on February 29, 2016 and June 3, 2016. The February 29, 2016 supplemental response was Bates stamped AC_BLD_0000001 - AC_BLD_0000737. The June 3, 2016 supplemental production was Bates stamped AC_BLD_0040939 – AC_BLD_0040990.

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED JANUARY 31, 2016**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

SoCalGas provides this information in response to the request for information from Blade Energy Partners, dated January 31, 2016. This information is based upon the best available non-privileged information known at this time, and is subject to change and/or supplementation as SoCalGas' investigation continues, and additional information becomes available.

DATA REQUESTS

Relief Well P39

Question 8:

SoCalGas' complete:

- well files,
- daily operations/drilling reports,
- service company reports & supplier invoices,
- all the above - historically from original well drilling, and,
- all the above - on a daily continuing basis until further notice.

Response 8 (dated February 29, 2016):

Please see enclosed electronic documents Bates range AC_BLADE_0002047 - AC_BLADE_0003624.

Supplemental Response 8:

Please see enclosed the following documents:

P39	AC BLD 0111963 – AC BLD 0112833
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The enclosed documents supplement the complete hard copy version of the well file for P39 originally produced on February 29, 2016, and include electronic well file documents and/or well-related information to further assist Blade's investigation with a comprehensive, broad set of well-related information. While SoCalGas continues to keep its well files in hard copy, electronic versions of well file records are available in various digital repositories (e.g., WellView, UGS Servers). The hard copy well file consists of the following: (1) histories (2) logs, (3) surveys, and (4) invoices. The only repository SoCalGas digitizes well file information is WellView.

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED FEBRUARY 19, 2016**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

SoCalGas provides this information in response to the request for information from Blade Energy Partners, dated February 19, 2016. This information is based upon the best available non-privileged information known at this time, and is subject to change and/or supplementation as SoCalGas' investigation continues, and additional information becomes available.

DATA REQUESTS

Question 4:

Please provide a complete well file for SS5. If possible, please provide the data in a chronological order. If this slows the process of compiling the data, please provide it as you have it.

Response 4 (dated February 29, 2016):

The well file for SS5 is enclosed as an electronic document with Bates range AC_BLD_0003858 - AC_BLD_0004332.

Question 5:

Please provide a complete well file for SS4-0. If possible, please provide the data in a chronological order. If this slows the process of compiling the data, please provide it as you have it.

Response 5 (dated February 29, 2016):

The well file for SS4-0 is enclosed as an electronic document with Bates range AC_BLD_0004333 - AC_BLD_0005560.

Supplemental Response 4 and 5:

Please see enclosed the following documents:

SS5	AC BLD 0119333 – AC BLD 0121229
SS4-0	AC BLD 0116875 – AC BLD 0119332

The enclosed documents supplement the complete hard copy version of the well files for SS5 and SS4-0 originally produced on February 29, 2016, and include electronic well file documents and/or well-related information to further assist Blade's investigation with a comprehensive, broad set of well-related information. While SoCalGas continues to keep its well files in hard copy, electronic versions of well file records are available in various digital repositories (e.g., WellView, UGS Servers). The hard copy well file consists of the following: (1) histories (2)

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED FEBRUARY 19, 2016**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

logs, (3) surveys, and (4) invoices. The only repository SoCalGas digitizes well file information is WellView.

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED APRIL 7, 2016**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

SoCalGas provides this information in response to the request for information from Blade Energy Partners, dated April 7, 2016. This information is based upon the best available non-privileged information known at this time, and is subject to change and/or supplementation as SoCalGas' investigation continues, and additional information becomes available.

DATA REQUESTS

Question 8:

Please provide the complete well file Frew 3.

Response 8 (dated April 25, 2016):

Please see enclosed electronic documents with Bates stamp range: AC_BLD_0031490 to AC_BLD_0032929.

Question 9:

Please provide the complete well file for FF-34 and FF-34A.

Response 9 (dated April 25, 2016):

Please see enclosed electronic documents with Bates stamp range: AC_BLD_0032930 to AC_BLD_0034135.

Question 10:

Please provide the complete well file for Porter 38.

Response 10 (dated April 25, 2016):

Please see enclosed electronic documents with Bates stamp range: AC_BLD_0034143 to AC_BLD_0034698.

Question 14:

Please provide a complete well file for Frew 7.

Response 14 (dated April 25, 2016):

Please see enclosed electronic documents with Bates stamp range: AC_BLD_0034769 to AC_BLD_0035412.

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED APRIL 7, 2016**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

Supplemental Response 8, 9, 10 and 14:

Please see enclosed the following documents:

Frew 3	AC BLD 0109333 – AC BLD 0110054
FF 34	AC BLD 0106417 – AC BLD 0107740
FF 34A	AC BLD 0107741 – AC BLD 0109332
Porter 38	AC BLD 0110960 – AC BLD 0111962
Frew 7	AC BLD 0110063 – AC BLD 0110946

The enclosed documents supplement the complete hard copy version of the well files for Frew 3, FF 34, FF 34A, P38, and Frew 7 originally produced on April 25, 2016, and include electronic well file documents and/or well-related information to further assist Blade's investigation with a comprehensive, broad set of well-related information. While SoCalGas continues to keep its well files in hard copy, electronic versions of well file records are available in various digital repositories (e.g., WellView, UGS Servers). The hard copy well file consists of the following: (1) histories (2) logs, (3) surveys, and (4) invoices. The only repository SoCalGas digitizes well file information is WellView.

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED FEBRUARY 18, 2018**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

SoCalGas provides this information in response to the request for information from Blade Energy Partners, dated February 18, 2018. This information is based upon the best available non-privileged information known at this time, and is subject to change and/or supplementation as SoCalGas' investigation continues, and additional information becomes available.

DATA REQUESTS

Question 1:

Request for the well files, including the P&A daily reports for the following wells:

Frew 6
Frew 7 (file was provided in April 2016. Please provide daily reports after April 2016)
Frew 8
Porter 47
Porter Sesnon 42
Sesnon Fee 3
Sesnon Fee 4
Sesnon Fee 6
Standard Sesnon 2
Standard Sesnon 13
Standard Sesnon 14 (File was provided in July 2016. Please provide daily reports after July 2016.)
Standard Sesnon 17
Standard Sesnon 24
Standard Sesnon 30

Response 1 (dated March 12, 2018):

Please see the enclosed Bates ranges for the following wells:

<u>WELL FILE</u>	<u>BATES RANGE</u>
Frew 7	AC BLD 0044960 – AC BLD 0045020
Standard Sesnon 14	AC BLD 0045021 – AC BLD 0045063

SoCalGas is compiling the remaining requested well files and will provide them to Blade when available.

Response 1 (dated March 16, 2018):

Please see the enclosed Bates range for each well:

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED FEBRUARY 18, 2018**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

<u>WELL FILE</u>	<u>BATES RANGE</u>
Frew 6	AC BLD 0045064 – AC BLD 0046511
Frew 8	AC BLD 0046512 – AC BLD 0047955
Porter 47	AC BLD 0047956 – AC BLD 0050216
Porter Sesnon 42	AC BLD 0050217 – AC BLD 0051799
Sesnon Fee 3	AC BLD 0051800 – AC BLD 0053655
Sesnon Fee 4	AC BLD 0053656 – AC BLD 0055000
Sesnon Fee 6	AC BLD 0055001 – AC BLD 0056721
Standard Sesnon 2	AC BLD 0056722 – AC BLD 0058885
Standard Sesnon 13	AC BLD 0058886 – AC BLD 0060540
Standard Sesnon 17	AC BLD 0060541 – AC BLD 0063197
Standard Sesnon 24	AC BLD 0063198 – AC BLD 0066021
Standard Sesnon 30	AC BLD 0066022 – AC BLD 0067590

Supplemental Response 1:

Please see enclosed the following documents:

Frew 6	AC BLD 0110055 – AC BLD 0110062
Frew 7	AC BLD 0110063 – AC BLD 0110946
Frew 8	AC BLD 0110947 – AC BLD 0110959
Porter 47	AC BLD 0114479 – AC BLD 0114491
Porter Sesnon 42	AC BLD 0116047 – AC BLD 0116051
Sesnon Fee 3	AC BLD 0116937 – AC BLD 0116962
Sesnon Fee 4	AC BLD 0116963 – AC BLD 0116971
Standard Sesnon 2	AC BLD 0116972 – AC BLD 0116974
Standard Sesnon 14	AC BLD 0122503 – AC BLD 0123628
Standard Sesnon 17	AC BLD 0123629 – AC BLD 0123634
Standard Sesnon 24	AC BLD 0123635 – AC BLD 0123650
Standard Sesnon 30	AC BLD 0123651 – AC BLD 0123653

The enclosed documents supplement the complete hard copy version of the well files for Frew 6, Frew 7, Frew 8, Porter 47, Porter Sesnon 42, Sesnon Fee 3, Sesnon Fee 4, Standard Sesnon 2, Standard Sesnon 14, Standard Sesnon 17, Standard Sesnon 24, Standard Sesnon 30 originally produced on March 12 and 16, 2018, and include electronic well file documents and/or well-related information to further assist Blade's investigation with a comprehensive, broad set of well-related information. While SoCalGas continues to keep its well files in hard copy, electronic versions of well file records are available in various digital repositories (e.g., WellView, UGS Servers). The hard copy well file consists of the following: (1) histories (2)

SOUTHERN CALIFORNIA GAS COMPANY

**BLADE ENERGY PARTNERS
REQUEST FOR INFORMATION DATED FEBRUARY 18, 2018**

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 1, 2019

logs, (3) surveys, and (4) invoices. The only repository SoCalGas digitizes well file information is WellView.

Ex. IX-6



April 12, 2019

Southern California Gas Company
555 W. 5th Street, GT21C3
Los Angeles, CA 90013

Attn: Mr. Glenn La Fevers

Subject: Blade RCA Data Request

Dear Mr. La Fevers:

Thank you for all the data already provided.

Blade understands from previous data requests and responses that prior to October 2015, the mechanical integrity test (MIT) program for Aliso Canyon gas-storage wells was to run a temperature log annually. Other MITs were conducted if temperature surveys showed anomalous results. This was stated as following DOGGR requirements in one of your data responses.

This data request is regarding the Attachment that shows the 2015 California Statutes and Regulations, Section 1724.10. Filing, Notifications, Operating, and Testing Requirements for Underground Injection Projects.

As stated in 1724.10 (g); pipeline-quality gas injection wells were exempt from the requirement of tubing and a packer. Section 1724.10 (j) (1) states: Prior to commencing injection operations, each injection well must pass a pressure test of the casing-tubing annulus to determine the absence of leaks. Thereafter, the annulus of each well must be tested at least once every five years; prior to recommencing injection operations following the repositioning; or replacement of downhole equipment; or whenever requested by the appropriate Division district deputy.

Please confirm whether the underlined requirement above is applicable to Aliso Canyon gas storage wells. If that requirement is not applicable to Aliso Canyon gas storage wells, Why not? Is there a documented exception to this requirement?

Please respond by April 19th, 2019. We require this response to complete our RCA.

Thank you,

Best Regards,

Ravi Krishnamurthy, Blade Energy Partners

Attachment 1

§ 1724.10. Filing, Notification, Operating, and Testing Requirements for Underground Injection Projects

(a) The appropriate Division district deputy shall be notified of any anticipated changes in a project resulting in alteration of conditions originally approved, such as: increase in size, change of injection interval, or increase in injection pressure. Such changes shall not be carried out without Division approval.

(b) Notices of intention to drill, redrill, deepen, or rework, on current Division forms, shall be completed and submitted to the Division for approval whenever a new well is to be drilled for use as an injection well and whenever an existing well is converted to an injection well, even if no work is required on the well.

(c) An injection report on a current Division form or in a computerized format acceptable to the Division shall be filed with the Division on or before the 30th day of each month, for the preceding month.

(d) A chemical analysis of the liquid being injected shall be made and filed with the Division whenever the source of injection liquid is changed, or as requested by the Supervisor.

(e) An accurate, operating pressure gauge or pressure recording device shall be available at all times, and all injection wells shall be equipped for installation and operation of such gauge or device. A gauge or device used for injection-pressure testing, which is permanently affixed to the well or any part of the injection system, shall be calibrated at least every six months. Portable gauges shall be calibrated at least every two months. Evidence of such calibration shall be available to the Division upon request.

(f) All injection piping, valves, and facilities shall meet or exceed design standards for the maximum anticipated injection pressure, and shall be maintained in a safe and leak-free condition.

(g) All injection wells, except steam, air, and pipeline-quality gas injection wells, shall be equipped with tubing and packer set immediately above the approved zone of injection within one year after the effective date of this act. New or recompleted injection wells shall be equipped with tubing and packer upon completion or recompletion. Exceptions may be made when there is:

(1) No evidence of freshwater-bearing strata.

(2) More than one string of casing cemented below the base of fresh water.

(3) Other justification, as determined by the district deputy, based on documented evidence that freshwater and oil zones can be protected without the use of tubing and packer.

(h) Data shall be maintained to show performance of the project and to establish that no damage to life, health, property, or natural resources is occurring by reason of the project. Injection shall be stopped if there is evidence of such damage, or loss of hydrocarbons, or upon written notice from the Division. Project data shall be available for periodic inspection by Division personnel.

(i) To determine the maximum allowable surface injection pressure, a step-rate test shall be conducted prior to sustained liquid injection. Test pressure shall be from hydrostatic to the pressure required to fracture the injection zone or the proposed injection pressure, whichever occurs first. Maximum allowable surface injection pressure shall be less than the fracture pressure. The appropriate district office shall be notified prior to conducting the test so that it may be witnessed by a Division inspector. The district deputy may waive or modify the requirement for a step-rate test if he or she determines that surface injection pressure for a particular well will be maintained considerably below the estimated pressure required to fracture the zone of injection.

(j) A mechanical integrity test (MIT) must be performed on all injection wells to ensure the injected fluid is confined to the approved zone or zones. An MIT shall consist of a two-part demonstration as provided in subsections (j)(1) and (2).

(1) Prior to commencing injection operations, each injection well must pass a pressure test of the casing-tubing annulus to determine the absence of leaks. Thereafter, the annulus of each well must be tested at least once every five years; prior to recommencing injection operations following the repositioning or replacement of downhole equipment; or whenever requested by the appropriate Division district deputy.

(2) When required by subsection (j) above, injection wells shall pass a second demonstration of mechanical integrity. The second test of a two-part MIT shall demonstrate that there is no fluid migration behind the casing, tubing, or packer.

(3) The second part of the MIT must be performed within three (3) months after injection has commenced. Thereafter, water-disposal wells shall be tested at least once each year; waterflood wells shall be tested at least once every two years; and steamflood wells shall be tested at least once every five years. Such testing for mechanical integrity shall also be performed following any significant anomalous rate or pressure change, or whenever requested by the appropriate Division district deputy. The MIT schedule may be modified by the district deputy if supported by evidence documenting good cause.

(4) The appropriate district office shall be notified before such tests/surveys are made, as a Division inspector may witness the operations. Copies of surveys and test results shall be submitted to the Division within 60 days.

(k) Additional requirements or modifications of the above requirements may be necessary to fit specific circumstances and types of projects. Examples of such additional requirements or modifications are:

(1) Injectivity tests.

(2) Graphs of time vs. oil, water, and gas production rates, maintained for each pool in the project and available for periodic inspection by Division personnel.

(3) Graphs of time vs. tubing pressure, casing pressure, and injection rate maintained for each injection well and available for periodic inspection by Division personnel.

(4) List of all observation wells used to monitor the project, indicating what parameter each well is monitoring (i.e., pressure, temperature, etc.), submitted to the Division annually.

(5) List of all injection-withdrawal wells in a gas storage project, showing casing-integrity test methods and dates, the types of safety valves used, submitted to the Division annually.

(6) Isobaric maps of the injection zone, submitted to the Division annually.

(7) Notification of any change in waste disposal methods.

Authority: Section 3013, Public Resources Code. Reference: Section 3106, Public Resources Code.

Ex. IX-7

**SOUTHERN CALIFORNIA GAS COMPANY
CPUC-SAFETY AND ENFORCEMENT DIVISION
DATA REQUEST DATED FEBRUARY 12, 2018**

RESPONSE DATED MARCH 5, 2018

Preliminary Statement

SoCalGas provides the following Responses to the CPUC-Safety and Enforcement Division's (CPUC-SED) data request dated February 12, 2018 related to the preliminary investigation regarding the Aliso Canyon Well Leak. The Responses are based upon the best available, non-privileged 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 reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

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 objects to CPUC-SED's instruction that SoCalGas' Responses be "verified" as that term is used in the instructions to SED's Request and verification is not required under the cited authority. SED has not defined this term within its request. 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 before any court, tribunal, agency or governmental action. Finally, at the time of this Response, there are no pending oral data requests from the CPUC-SED to SoCalGas.

Question 7:

Please provide Well kill plans, 1, 2, 3, 4, 5, and 6.

Response 7:

SoCalGas understands this question to be asking for Boots & Coots well kill plans 1-6. Please see electronic documents with Bates Range AC_CPUC_0206050 through AC_CPUC_0206061.

Question 8:

It is SED's understanding that these well kill plans reference in question 7 are also referred to as "sheets". Please confirm SED's understanding is accurate.

Response 8:

Yes.

**SOUTHERN CALIFORNIA GAS COMPANY
CPUC-SAFETY AND ENFORCEMENT DIVISION
DATA REQUEST DATED FEBRUARY 12, 2018**

RESPONSE DATED MARCH 5, 2018

Question 9:

Please provide any deviations that occurred from the well kill plans provided in response to Question 7.

Response 9:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as vague and ambiguous. Notwithstanding this objection, SoCalGas responds as follows: For actual work conducted at the SS-25 site on the dates of each Boots & Coots well kill, please see electronic documents with Bates Range:

- AC_CPUC_0205435 through AC_CPUC_0205437 (11-13-15)
- AC_CPUC_0205441 through AC_CPUC_0205443 (11-15-15)
- AC_CPUC_0205450 through AC_CPUC_0205452 (11-18-15)
- AC_CPUC_0205467 through AC_CPUC_0205469 (11-24-15)
- AC_CPUC_0205470 through AC_CPUC_0205472 (11-25-15)
- AC_CPUC_0205528 through AC_CPUC_0205529 (12-22-15)

Question 10:

Please provide any and all communications relating to Aliso Canyon between SoCalGas and Boots and Coots for the time period October 1, 2015 – January 31, 2018.

Response 10:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_0165876 through AC_CPUC_0188808. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Question 12:

Please provide any and all communications relating to Aliso Canyon between SoCalGas and Don Shackelford for the time period October 1, 2015 – January 31, 2018.

**SOUTHERN CALIFORNIA GAS COMPANY
CPUC-SAFETY AND ENFORCEMENT DIVISION
DATA REQUEST DATED FEBRUARY 12, 2018**

RESPONSE DATED MARCH 5, 2018

Response 12:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: SoCalGas provided an initial response to this question on March 2, 2018. For additional responsive documents, please see electronic documents with Bates Range AC_CPUC_00165699 through AC_CPUC_0170586. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Question 16:

With regards to well-kill attempts, what data did SCG (or its agents) provide to the National Labs? Did SCG provide the Labs with any other data relating to the Aliso leak? Was any information received back?

Response 16:

SoCalGas objects to this Request for failing to specify the time period for which SED seeks a response and to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_0188809 through AC_CPUC_0189427. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Question 18:

Provide a list of all Boots and Coots personnel who were present for any amount of time at Aliso between October 2015 and January 2018; please include job descriptions, titles, and the dates when each individual was present.

**SOUTHERN CALIFORNIA GAS COMPANY
CPUC-SAFETY AND ENFORCEMENT DIVISION
DATA REQUEST DATED FEBRUARY 12, 2018**

RESPONSE DATED MARCH 5, 2018

Response 18:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as overly broad and unduly burdensome. Notwithstanding this objection, SoCalGas responds as follows: For SS-25 and P39A Boots & Coots Daily Reports, which include a list of Boots & Coots personnel, job titles, and dates the individuals were present, please see electronic documents with Bates Range AC_CPUC_0205206 through AC_CPUC_0205383. For Aliso Canyon Access Passes, please see electronic documents with Bates Range AC_CPUC_0189428 through AC_CPUC_0205205.

Question 19:

Provide any contractors, subcontractors, or other personnel hired by SoCalGas who were involved in the operations of the leak response and subsequent kill operations, and also present at Aliso for the dates mentioned in question 18; please include job descriptions, titles, and the dates when each individual was present.

Response 19:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as overly broad and unduly burdensome. Notwithstanding this objection, SoCalGas responds as follows:

- 1816 Drilling (Pete Slagel)
- Ace Pump
- ACME Truck Line Inc
- Add Energy (Morten Haug Emilsen)
- Advanced Industrial Services
- Andy Gump
- Anterra Energy Services Inc
- Applus RTD
- B&L Casing Services
- B&L Trailer Rentals
- Baker Hughes
- Bakersfield Pipe & Supply - OCTG
- BCI Construction

**SOUTHERN CALIFORNIA GAS COMPANY
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DATA REQUEST DATED FEBRUARY 12, 2018**

RESPONSE DATED MARCH 5, 2018

- Boots & Coots
- Brandt
- Cameron West Coast
- Capstone Fire Management Inc
- Carbone Wireline
- Steve Cardiff
- Central Coast Piping Products
- Chemical Waste Management Inc
- Clean Harbors Environmental
- Doby Hagar Trucking
- Downhole Stabilization
- Ensign Resources
- Jim Fox
- Geo Drilling Fluids Inc
- G.M. Volkmar
- Halliburton Energy Services
- Hogg Drilling
- Hurst Welding
- Instrument Service Incorporated
- Kennedy Jenks
- Kevin Katolas
- Krummrich Engineering
- K-Vac Environmental Services Inc
- Jim Mansdorfer
- Mission Valley Sanitation Inc
- National Oilwell/Varco
- NOV Tubscope
- NRC Environmental Services
- Oil Field Tubulars
- Onyx Oil Service Inc
- OST Trucks & Cranes
- Pacific Petroleum
- Padilla Electric Builders Inc
- Petroleum Solids Control
- Petrolog
- Pinkerton Consulting & Investigation
- Quality Ag Inc
- Quality Tubular Services Inc

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RESPONSE DATED MARCH 5, 2018

- San Joaquin Bit Service
- SC Fuels
- Schlumberger Technology Corp
- SDI (Scientific Drilling)
- Sierra Hamilton (Don Shackelford)
- Sperry
- T&T Truck and Crane Service
- Tel Steel
- Thompco
- UCI Construction Inc
- United Rental
- Valley Perforating
- Vector Magnetics
- Veolia ES Technical Solutions Llc
- Versa-Line Services Inc
- Weatherford
- Welaco
- Western Wireline
- Wild Well (John Wright)

For SoCalGas Daily Operations Reports for SS25 and P39A that include vendor names and dates, please see electronic documents with Bates range AC_CPUC_0205384 through AC_CPUC_0206409. For Aliso Canyon Access Passes, please see electronic documents with Bates Range AC_CPUC_0189428 through AC_CPUC_0205205.

Question 20:

Provide a list of all Haliburton personnel who were present for any amount of time at Aliso between October 2015 and January 2018; please include job descriptions, titles, and the dates when each individual was present.

Response 20:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this Request as overly broad and unduly burdensome. Notwithstanding this objection, SoCalGas responds as follows: For SoCalGas Daily Operations Reports for SS25 and P39A which include vendor names and dates, including Haliburton Energy Services, Inc., please see electronic documents with Bates range AC_CPUC_0205384 through

**SOUTHERN CALIFORNIA GAS COMPANY
CPUC-SAFETY AND ENFORCEMENT DIVISION
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RESPONSE DATED MARCH 5, 2018

AC_CPUC_0206049. For Aliso Canyon Access Passes, please see electronic documents with Bates Range AC_CPUC_0189428 through AC_CPUC_0205205.

Ex. IX-8

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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. (U904G).

I.19-06-016

(Filed June 27, 2019)

**SOUTHERN CALIFORNIA GAS COMPANY'S SIXTH SET OF DATA REQUESTS TO
THE SAFETY AND ENFORCEMENT DIVISION**

PLEASE TAKE NOTICE that Southern California Gas Company ("SoCalGas") hereby requests the Safety and Enforcement Division of the California Public Utilities Commission ("SED") to provide a written response to this Data Request in accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission").

In accordance with Article 10 of the Commission's Rules of Practice and Procedure, please produce the following information and described categories of DOCUMENTS. Please provide YOUR response no later than the due date requested below. If YOU are unable to provide the information by this date, please provide a written explanation as to why the response date cannot be met and YOUR best estimate of when the information can be provided. Please e-mail all responses that can be transmitted electronically. If attachments cannot be electronically transmitted, please notify the undersigned via e-mail or phone and arrangements will be made for the alternate submission of said attachments.

INSTRUCTIONS

1. Answer in the greatest detail YOU are able for each of the Data Requests.
2. Include a copy of each data request that the response addresses before each response.

3. Return the completed and signed copy of YOUR answers to APatel@socalgas.com and GHealy@socalgas.com as an attachment to electronic mail by close of business on **January 6, 2020**.
4. Any of the Data Requests and YOUR answers thereto may be offered as evidence in any hearing in the above-styled and numbered cause.
5. In answering the Data Requests, YOU are required to set forth each responsive fact, circumstance, act, omission, or course of conduct, whether or not admissible in evidence at trial about which YOU have or had information, or which is or will be the basis for any contention made by YOU with respect to the Application.
6. The Data Requests shall be interpreted to make requests for information inclusive rather than exclusive.
7. YOU are required to supplement YOUR answers to include information acquired after filing YOUR responses to the Data Requests if YOU obtain information upon the basis of which YOU know that the response was incorrect or incomplete when made, or YOU know that the response that was originally correct and complete when made is no longer true and complete and the circumstances are such that “[f]ailure to amend the answer is in substance misleading.
8. If YOU are not capable of answering any of the Data Requests completely, please state the portion of the Data Request that YOU are unable to answer, and to the extent possible set forth the reasons for YOUR inability to answer more fully, and state whatever knowledge or information YOU have concerning the unanswered portion.
9. If requested information is not available in exactly the form requested, furnish carefully prepared estimates, designated as such, and explain the basis of the estimate, or indicate that YOU are unable to obtain the information and explain the reason that YOU cannot obtain the information. Where information is supplied pursuant to this instruction, explain why the information is being supplied in a form different from that requested.
10. If YOU withhold under a claim of privilege any document(s) responsive to the Data Requests, furnish a list specifying each document so identified, then set forth separately with respect to each document:
 - a. the type of document;
 - b. the date of the document;
 - c. for email or other correspondence, the author, sender(s), and recipient(s); and,
 - d. the legal and factual basis of privilege claim.
11. Please include such privilege log in service of responses to the Data Requests.

12. If a responsive document has been destroyed, is alleged to have been destroyed, or exists but is unavailable or no longer in YOUR possession, custody or control, please provide the following:
 - a. the date of the document;
 - b. the names and titles of the author(s), sender(s), and recipients(s) of the document;
 - c. the reason for the document's destruction, disposition, or non-availability;
 - d. person(s) having knowledge of its destruction, disposition, or non-availability; and
 - e. the person(s) responsible for its destruction, disposition, or non-availability.
13. As to any document produced in response to the Data Request, state the Data Request to which the document is made available as a response.
14. Where the context herein makes it appropriate, each singular word shall include its plural and each plural word shall include its singular. All words and phrases shall be construed as masculine, feminine or neuter gender according to the context.
15. Documents to be produced include all documents in YOUR possession, custody or control, which includes not only actual physical possession, but constructive possession, and the right to obtain possession from a third party, such as an agent or representative.
16. For each request below that calls for an admission, please state whether YOU admit or deny. For any response that is not an unqualified admission, 1) state all facts upon which YOU base YOUR response; 2) state the names, addresses, and telephone numbers of all persons who have knowledge of those facts; and 3) identify all documents and other tangible things that support YOUR response, and state the name, address, and telephone number of the person who has each document or thing.

DEFINITIONS

1. "OPENING TESTIMONY" means the filing that SED styled as "Opening Testimony" in the above-referenced proceeding, and served on November 22, 2019.
2. "YOU," "YOUR," or "SED" means the Commission's Safety and Enforcement Division or its predecessors.

DATA REQUESTS

YOU assert the following violations on pages 62-63 of YOUR OPENING TESTIMONY:

Each of the 95 pages that SoCalGas did not release on the grounds of attorney-client or attorney work product privilege is a Section 451 violation because it delayed SED's ability to get this information as part of its pre-formal investigation. These also constitute separate

violations of Commission Rule of Practice and Procedure Rule 1.1 because SoCalGas represented to SED that these items were protected by attorney-client or attorney work product privilege, when they were not...

The 18 additional communications that SoCalGas did not release until May 11, 2019 each constitutes its own violation of Section 451 due to the delay it caused to SED's ability to get this information as part of its pre-formal investigation.

As referenced in the above passage, and further described at pages 61-63 of YOUR OPENING TESTIMONY, YOU state that the following documents that SoCalGas produced to SED serve as the basis for 113 asserted violations of each of Public Utilities Code Section 451 and Rule 1.1 of the CPUC's Rules of Practice and Procedure:

- a) AC_CPUC_SED_DR_16_0043471-AC_CPUC_SED_DR_16_0043550
 - b) AC_CPUC_SED_DR_16_0003158.0001
 - c) AC_CPUC_SED_DR_16_0003488.0001
 - d) AC_CPUC_SED_DR_16_0006434.0001
 - e) AC_CPUC_SED_DR_16_0012283.0001
 - f) AC_CPUC_SED_DR_16_0012287.0001
 - g) AC_CPUC_SED_DR_16_0013714.0001
 - h) AC_CPUC_SED_DR_16_0013718.0001
 - i) AC_CPUC_SED_DR_16_0018118.0001
 - j) AC_CPUC_SED_DR_16_0018344.0001
 - k) AC_CPUC_SED_DR_16_0018346.0001
 - l) AC_CPUC_SED_DR_16_0018347.0001
 - m) AC_CPUC_SED_DR_16_0018349.0001
 - n) AC_CPUC_SED_DR_16_0043334.0001
 - o) AC_CPUC_SED_DR_16_0043336.0001
 - p) AC_CPUC_SED_DR_16_0043338.0001
 - q) AC_CPUC_SED_DR_16_0008796.0001 - AC_CPUC_SED_DR_16_0008796.0002
 - r) AC_CPUC_SED_DR_16_0021942.0001 - AC_CPUC_SED_DR_16_0021942.0002
 - s) AC_CPUC_SED_DR_16_0023083.0001 - AC_CPUC_SED_DR_16_0023083.0002
 - t) AC_CPUC_SED_DR_16_0043567 - AC_CPUC_SED_DR_16_0043578
1. Please identify which of the documents listed above, if any, were material to SED's investigation into the LEAK.
 2. For each document that YOU identify in response to Question 1, please identify which violation(s) that document informed.
 3. With respect to the above passage from pages 62-63 of YOUR OPENING TESTIMONY, please describe with specificity how "[e]ach of the 95 pages that SoCalGas did not

release on the grounds of attorney-client or attorney work product privilege is a Section 451 violation.”

4. With respect to the above passage from pages 62-63 of YOUR OPENING TESTIMONY, please describe with specificity how the “18 additional communications that SoCalGas did not release until May 11, 2019 each constitutes its own violation of Section 451.”
5. Admit that a utility may withhold a document from production to SED if it has a reasonable basis for designating the document as protected from disclosure by the attorney-client privilege. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.
6. Admit that a utility may withhold a document from production to SED if it has a reasonable basis for designating the document as protected from disclosure by the attorney work product doctrine. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.
7. Admit that a utility’s disclosure and production of a document initially withheld as privileged does not constitute a violation of the Public Utilities Code Section 451 if the utility had a reasonable basis for initially designating the document as privileged. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.
8. Admit that a utility’s disclosure and production of a document initially withheld as privileged does not constitute a violation of the Rule 1.1 of the CPUC’s Rules of Practice and Procedure if the utility had a reasonable basis for initially designating the document as privileged. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.

Ex. IX-9

L19-06-016: Safety and Enforcement Division Response to Southern California Gas Company Data Request 6

YOU assert the following violations on pages 62-63 of YOUR OPENING TESTIMONY: Each of the 95 pages that SoCalGas did not release on the grounds of attorney-client or attorney work product privilege is a Section 451 violation because it delayed SED's ability to get this information as part of its pre-formal investigation. These also constitute separate violations of Commission Rule of Practice and Procedure Rule 1.1 because SoCalGas represented to SED that these items were protected by attorney-client or attorney work product privilege, when they were not....

The 18 additional communications that SoCalGas did not release until May 11, 2019 each constitutes its own violation of Section 451 due to the delay it caused to SED's ability to get this information as part of its pre-formal investigation.

As referenced in the above passage, and further described at pages 61-63 of YOUR OPENING TESTIMONY, YOU state that the following documents that SoCalGas produced to SED serve as the basis for 113 asserted violations of each of Public Utilities Code Section 451 and Rule 1.1 of the CPUC's Rules of Practice and Procedure:

- a) AC_CPUC_SED_DR_16_0043471-AC_CPUC_SED_DR_16_0043550
- b) AC_CPUC_SED_DR_16_0003158.0001
- c) AC_CPUC_SED_DR_16_0003488.0001
- d) AC_CPUC_SED_DR_16_0006434.0001
- e) AC_CPUC_SED_DR_16_0012283.0001
- f) AC_CPUC_SED_DR_16_0012287.0001
- g) AC_CPUC_SED_DR_16_0013714.0001
- h) AC_CPUC_SED_DR_16_0013718.0001
- i) AC_CPUC_SED_DR_16_0018118.0001
- j) AC_CPUC_SED_DR_16_0018344.0001
- k) AC_CPUC_SED_DR_16_0018346.0001
- l) AC_CPUC_SED_DR_16_0018347.0001
- m) AC_CPUC_SED_DR_16_0018349.0001
- n) AC_CPUC_SED_DR_16_0043334.0001
- o) AC_CPUC_SED_DR_16_0043336.0001
- p) AC_CPUC_SED_DR_16_0043338.0001
- q) AC_CPUC_SED_DR_16_0008796.0001 - AC_CPUC_SED_DR_16_0008796.0002
- r) AC_CPUC_SED_DR_16_0021942.0001 - AC_CPUC_SED_DR_16_0021942.0002
- s) AC_CPUC_SED_DR_16_0023083.0001 - AC_CPUC_SED_DR_16_0023083.0002
- t) AC_CPUC_SED_DR_16_0043567 - AC_CPUC_SED_DR_16_0043578

1. Please identify which of the documents listed above, if any, were material to SED's investigation into the LEAK.

SED objects to this question on the grounds that SoCalGas has asked SED to provide a legal justification for one of its asserted violations, which SoCalGas agreed it would not do in the pre-hearing conference.

SoCalGas's position was that SED should identify alleged violations with specificity in opening testimony. SED identified a concern that SoCalGas not cross-examine SED's witnesses as lawyers for concluding that there was a violation, and SoCalGas voiced no objection to this concern. SED has now proceeded in reliance on SoCalGas's assurance on the record that it would not cross-examine SED's witnesses for identifying the legal justifications for alleged violations in testimony, but this question does exactly that. For context and reference, SED quotes the pertinent portion of the transcript here.¹

The next question concerns the deadline for SED to submit alleged violations and the factual and legal justifications for each alleged violation. My question is whether it would be reasonable to set a deadline of opening testimony for SED to submit alleged violations, and the factual justifications for each alleged violation, and set a deadline of opening briefs for SED to submit the legal justifications for its alleged violations?

Would any party like to respond to my question? SoCalGas.

MR. STODDARD: SoCalGas's position on this is that SED should identify the alleged violations with specificity in its opening testimony sooner, if possible; but in its opening testimony would be acceptable to SoCalGas as we had proposed in our prehearing conference statement.

MR. SHER: Your Honor, SED would not necessarily be opposed to such if SoCalGas agreed now that it would not waste time cross-examining SED's witness as to their legal basis for tying violations to code sections, et cetera.

ALJ KENNEY: Does SoCalGas have a response at this time?

MR. STODDARD: SoCalGas is not going to waive any rights to cross-examination. Although, I would ask for clarification what exactly is meant by "legal basis" here?

MR. SHER: The way your Honor set this out is that the violations would be set forth in the opening, and then the legal issues would be discussed in the briefing.

¹ See I.19-06-016, Pre-hearing conference transcripts, pp. 43 : 11 to 44 : 28.

To the degree -- it is highly unlikely that SED's witness will be a lawyer. So we don't want SoCalGas, if we are going to do this all in our opening testimony, to cross-examine the witness as to their legal basis for concluding that this is a violation, for example, of 451.

MR. STODDARD: SoCalGas does not object to that.

ALJ KENNEY: Thank you.

2. For each document that YOU identify in response to Question 1, please identify which violation(s) that document informed.

SED incorporates its objection in response to question 1 by reference here.

3. With respect to the above passage from pages 62-63 of YOUR OPENING TESTIMONY, please describe with specificity how “[e]ach of the 95 pages that SoCalGas did not release on the grounds of attorney-client or attorney work product privilege is a Section 451 violation.”

SED incorporates its objection in response to question 1 by reference here.

4. With respect to the above passage from pages 62-63 of YOUR OPENING TESTIMONY, please describe with specificity how the “18 additional communications that SoCalGas did not release until May 11, 2019 each constitutes its own violation of Section 451.”

SED incorporates its objection in response to question 1 by reference here.

5. Admit that a utility may withhold a document from production to SED if it has a reasonable basis for designating the document as protected from disclosure by the attorney-client privilege. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.

SED objects to this on the grounds that it is vague as to which portion of SED’s testimony it is questioning, and how exactly the question relates to SED’s testimony. SED further objects to this on the grounds that it calls for a legal conclusion. To the extent that this asks for the legal justification underlying a violation in SED’s opening testimony, SED incorporates by reference its objection to question 1 here.

6. Admit that a utility may withhold a document from production to SED if it has a reasonable basis for designating the document as protected from disclosure by the attorney work product doctrine. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.

SED objects to this on the grounds that it is vague as to which portion of SED's testimony it is questioning, and how exactly the question relates to SED's testimony. SED further objects to this on the grounds that it calls for a legal conclusion. To the extent that this asks for the legal justification underlying a violation in SED's opening testimony, SED incorporates by reference its objection to question 1 here.

7. Admit that a utility's disclosure and production of a document initially withheld as privileged does not constitute a violation of the Public Utilities Code Section 451 if the utility had a reasonable basis for initially designating the document as privileged. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.

SED objects to this on the grounds that it is vague as to which portion of SED's testimony it is questioning, and how exactly the question relates to SED's testimony. SED further objects to this on the grounds that it calls for a legal conclusion. To the extent that this asks for the legal justification underlying a violation in SED's opening testimony, SED incorporates by reference its objection to question 1 here.

8. Admit that a utility's disclosure and production of a document initially withheld as privileged does not constitute a violation of the Rule 1.1 of the CPUC's Rules of Practice and Procedure if the utility had a reasonable basis for initially designating the document as privileged. If YOU are unable to provide anything but an unqualified admission, please deny the request, and state the basis for your denial.

SED objects to this on the grounds that it is vague as to which portion of SED's testimony it is questioning, and how exactly the question relates to SED's testimony. SED further objects to this on the grounds that it calls for a legal conclusion. To the extent that this asks for the legal justification underlying a violation in SED's opening testimony, SED incorporates by reference its objection to question 1 here.

Ex. IX-10

SED Data Response to SoCalGas Data Request 5.

1. Provide any and all of Margaret Felts' WORK PAPERS related to the Opening Testimony.

SED objects to this question to the extent it is protected by attorney-client privilege. SED further objects to this question on the grounds that it asks for the following, as provided in SoCalGas's definitions, and shown immediately below. SED further objects to this question on the grounds that, the request for WORK PAPERS, as defined by SoCalGas and provided in response to question 1, is unduly burdensome.

"WORK PAPERS" means all writings, recordings, or graphic material of any kind that was considered, prepared, evaluated, analyzed, studied, reviewed, referenced, and/or relied upon in connection with the preparation of SED's OPENING TESTIMONY, including the following: agreements; contracts; e-mails; letters; inter-office and intraoffice communications; memoranda; reports; records; instructions; manuals; specifications; notes; notebooks; drawings; sketches; blueprints; diagrams; photographs; photocopies; charts; graphs; agendas and minutes of meetings, conferences, and telephone or other conversations or communications; invoices; purchase orders; audio recordings; video recordings; published or unpublished speeches or articles; publications; transcripts, summaries, and notes relating to telephonic and in-person communications; SMS and text messages, messages transmitted in real-time via the Internet; voicemail messages; ledgers; financial statements; microfilm; tape or disc recordings; and computer print-outs. The term "WORK PAPERS" also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form. The term "WORK PAPERS" also includes all drafts of a document and all copies that differ in any respect from the original, including any notation, underlining, marking, or information not on the original.

2. Provide the contract(s) SED entered into with Margaret Felts in connection with the PROCEEDING.

See attached document that accompanies this data response.

3. Provide any and all of SED's WORK PAPERS related to the Opening Testimony.

a. For all WORK PAPERS prepared by SED contractors or personnel, identify the author and date prepared.

SED objects to this question on the grounds that SED's WORK PAPERS, as defined by SoCalGas, are protected by the attorney-client privilege. SED further objects to this question on the grounds that, the request for WORK PAPERS, as defined by SoCalGas and provided in response to question 1, is unduly burdensome.

Ex. IX-11

**SOUTHERN CALIFORNIA GAS COMPANY
CPUC-SAFETY AND ENFORCEMENT DIVISION
DATA REQUEST DATED FEBRUARY 12, 2018**

SOCALGAS' SUPPLEMENTAL RESPONSE DATED MARCH 15, 2019

SoCalGas provides the following responses to the California Public Utilities Commission–Safety and Enforcement Division’s (SED) February 12, 2018 request for information. These responses are based upon the best available non-privileged information known at this time, and are subject to change and/or supplementation as SoCalGas’ investigation continues, and additional information becomes available.

SED Data Request 16, Question 10:

Please provide any and all communications relating to Aliso Canyon between SoCalGas and Boots and Coots for the time period October 1, 2015 – January 31, 2018.

Response (March 5, 2018):¹

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_0165876 through AC_CPUC_0188808. Responsive documents were identified by searching the relevant SoCalGas employees’ email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Response to Data Request 17, Question 1 (May 23, 2018):²

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0001027 - AC_CPUC_SED_DR_16_0019407. Responsive documents were identified by searching the relevant SoCalGas employees’ email data sets to

¹ SoCalGas provided responses to CPUC-SED’s data request dated February 12, 2018 related to the preliminary investigation regarding the Aliso Canyon Well Leak (SED 16), on March 1, 2, and 5, 2018. On March 30, 2018, SED provided new instructions to be followed when providing a data response, and requested that SoCalGas reproduce the responses to this request. On May 23, 2018, SoCalGas re-produced the responses to SED 16 in response to Question 1 of SED Data Request 17 dated March 30, 2018.

² Submitted in SoCalGas’ May 23, 2018 response to Question 1 of CPUC SED data request dated March 30, 2018.

locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Nonresponsive information has been redacted from documents in this production.

Supplemental Response 16, Question 10 (July 12, 2018)

SoCalGas has identified additional documents that may be responsive to this Request. Without limiting or waiving any objections previously asserted, SoCalGas provides the following Supplemental Response to its May 23, 2018 Response to Data Request 16: please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0041597 - AC_CPUC_SED_DR_16_0041768.

For SED's convenience, SoCalGas is separately identifying a subset of these documents that reflect communications with both Boots and Coots, and additionally, Don Shackelford. For this subset of documents, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0041769 - AC_CPUC_SED_DR_16_0042118.

Supplemental Response Data Request 16, Question 10 (August 3, 2018)

SoCalGas has identified additional documents that may be responsive to this Request. Without limiting or waiving any objections previously asserted, SoCalGas provides the following Supplemental Response to its May 23, 2018 Response to Data Request 16: please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0001049.0001 - AC_CPUC_SED_DR_16_0018783.0001 (non-continuous); AC_CPUC_SED_DR_16_0042132 - AC_CPUC_SED_DR_16_0043449 (continuous).

For SED's convenience, SoCalGas is separately identifying a subset of these documents that reflect communications with both Boots and Coots, and additionally, Don Shackelford. For this subset of documents, please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0023925.0001 - AC_CPUC_SED_DR_16_0024024.0001 (noncontinuous); AC_CPUC_SED_DR_16_0043450 - AC_CPUC_SED_DR_16_0043460 (continuous).

Supplemental Response Data Request 16, Question 10 (January 3, 2019)

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

As explained in response to Question 1 of SED Data Request 34, SoCalGas has agreed to withdraw its claim of privilege and produce certain additional documents that may be responsive to this Request. Without limiting or waiving any other objections asserted, SoCalGas provides the following Supplemental Response to Data Request 16: please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0043471 - AC_CPUC_SED_DR_16_0043550 (continuous) and the following documents (non-continuous):”

AC_CPUC_SED_DR_16_0003158.0001 AC_CPUC_SED_DR_16_0003488.0001
AC_CPUC_SED_DR_16_0006434.0001 AC_CPUC_SED_DR_16_0012283.0001
AC_CPUC_SED_DR_16_0012287.0001 AC_CPUC_SED_DR_16_0013714.0001
AC_CPUC_SED_DR_16_0013718.0001 AC_CPUC_SED_DR_16_0018118.0001
AC_CPUC_SED_DR_16_0018344.0001 AC_CPUC_SED_DR_16_0018346.0001
AC_CPUC_SED_DR_16_0018347.0001 AC_CPUC_SED_DR_16_0018349.0001
AC_CPUC_SED_DR_16_0043334.0001 AC_CPUC_SED_DR_16_0043336.0001
AC_CPUC_SED_DR_16_0043338.0001

Supplemental Response Data Request 16, Question 10 (March 11, 2019):

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas has identified additional documents that may be responsive to this Request. Without limiting or waiving any objections previously asserted, SoCalGas provides the following Supplemental Response to its May 23, 2018 Response to Data Request 16: please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0043551 - AC_CPUC_SED_DR_16_0043566. Responsive documents were identified by searching the relevant SoCalGas employees' text message data sets to locate text messages to/from this third party dated from October 1, 2015 to January 31, 2018.

Supplemental Response Data Request 16, Question 10 (March 15, 2019)

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

Pursuant to SoCalGas' email communication dated May 11, 2019, SoCalGas has agreed to withdraw its claim of privilege and produce certain additional documents that may be responsive to this Request. Without limiting or waiving any other objections asserted, SoCalGas provides the following Supplemental Response to Data Request 16: please see electronic documents with Bates Range:

AC_CPUC_SED_DR_16_0008796.0001 - AC_CPUC_SED_DR_16_0008796.0002
AC_CPUC_SED_DR_16_0043567 - AC_CPUC_SED_DR_16_0043577
AC_CPUC_SED_DR_16_0021942.0001 - AC_CPUC_SED_DR_16_0021942.0002
AC_CPUC_SED_DR_16_0023083.0001 - AC_CPUC_SED_DR_16_0023083.0002
AC_CPUC_SED_DR_16_0043578 - AC_CPUC_SED_DR_16_0043578

SED Data Request 16, Question 12:

Please provide any and all communications relating to Aliso Canyon between SoCalGas and Don Shackleford for the time period October 1, 2015 – January 31, 2018.

Response (March 5, 2018)

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: SoCalGas provided an initial response to this question on March 2, 2018. For additional responsive documents, please see electronic documents with Bates Range AC_CPUC_00165699 through AC_CPUC_0170586. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Response to Data Request 17, Question 1 (May 23, 2018)

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request to the extent the response involves attorney-client privileged information and/or attorney work product. Notwithstanding this objection, SoCalGas responds as follows: Please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0019408 - AC_CPUC_SED_DR_16_0024117 and AC_CPUC_SED_DR_16_0024132 - AC_CPUC_SED_DR_16_0025021. Responsive documents were identified by searching the relevant SoCalGas employees' email data sets to locate emails to/from this third party dated from October 1, 2015 to January 31, 2018. Non-responsive information has been redacted from documents in this production.

Supplemental Response 16, Question 12 (July 12, 2018)

SoCalGas has identified additional documents that may be responsive to this Request. Without limiting or waiving any objections previously asserted, SoCalGas provides the following Supplemental Response to its May 23, 2018 Response to Data Request 16: please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0042119 - AC_CPUC_SED_DR_16_0042131.

Supplemental Response 16, Question 12 (August 3, 2018)

SoCalGas has identified additional documents that may be responsive to this Request. Without limiting or waiving any objections previously asserted, SoCalGas provides the following

Supplemental Response to its May 23, 2018 Response to Data Request 16: please see electronic documents with Bates Range AC_CPUC_SED_DR_16_0024863.0001 - AC_CPUC_SED_DR_16_0025018.0001 (non-continuous); AC_CPUC_SED_DR_16_0043461 - AC_CPUC_SED_DR_16_0043470 (continuous).

Supplemental Response 16, Question 12 (March 15, 2019)

Pursuant to SoCalGas' email communication dated May 11, 2019, SoCalGas has agreed to withdraw its claim of privilege and produce certain additional documents that may be responsive to this Request. Without limiting or waiving any other objections asserted, SoCalGas provides the following Supplemental Response to Data Request 16: please see electronic documents with Bates Range:

AC_CPUC_SED_DR_16_0021942.0001 - AC_CPUC_SED_DR_16_0021942.0002
AC_CPUC_SED_DR_16_0023083.0001 - AC_CPUC_SED_DR_16_0023083.0002
AC_CPUC_SED_DR_16_0043578 - AC_CPUC_SED_DR_16_0043578