

SoCalGas-58

SoCalGas' Fifteenth Set of Data Requests to SED

I.19-06-016

ALJs: Hecht/Poirier

Date Served: March 15, 2021

**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 FIFTEENTH 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.

**Exhibit
2-14
2/24/2021
M. Felts**

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 **October 13, 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 failure 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. "DOCUMENTS" means, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, and orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries of records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including but not limited to microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records) other data compilations (including without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand,

or use the same), and other DOCUMENTS or tangible things of whatever description which constitute or contain information within the scope of these data requests.

2. “SUR-REPLY TESTIMONY” means Chapters 1 through 9 of the filing that SED styled as “Prepared Sur-Reply Testimony of Margaret Felts” in the above-referenced proceeding, and served on SoCalGas on June 30, 2020.
3. “YOU,” “YOUR,” or “SED” means the Commission’s Safety and Enforcement Division or its predecessors, including all employees, contractors, personnel, and individuals working on its behalf.

DATA REQUESTS

1. Refer to the following statements in SED’s SUR-REPLY TESTIMONY, Chapter 1, on pages 1-2:

[E]ven if there were industry standards, they would *not necessarily* set the standard to determine whether or not SoCalGas violated Section 451, which is the section of the PU Code that requires the Utility to operate its facilities safely. My Opening Testimony charges SoCalGas with safety violations, not violations of industry standards. (Emphasis added.)

- a. Under what circumstances does an industry standard “set the standard to determine whether or not SoCalGas violated Section 451”?
 - b. Please provide YOUR definition of “safety violation” as used in the quoted text.
 - c. How do YOU determine that a utility’s conduct constitutes a “safety violation”?
 - d. How do YOU determine if a “safety violation” constitutes a violation of Section 451?
 - e. Do YOU contend that all “safety violations,” as used in the testimony quoted above, are violations of Section 451?
 - f. If the answer to question e. is “yes,” state all bases supporting SED’s contention.
2. Do YOU contend that API RP 585 applied to gas storage facilities prior to the Incident?
 3. Do YOU contend that API RP 585 applies to gas storage facilities as of the date of this data request?
 4. Refer to the following statement in SED’s SUR-REPLY TESTIMONY, Chapter 1, in footnote 38:

Also based on Felts’ experience using basic engineering principles of collecting relevant data for the development of operating instructions, compliance programs, safety programs and preventative maintenance programs for Amoco Oil

Company, Celanese, the Department of Defense, the Department of Toxic Substances Control and several private clients.

a. Identify all of the “private clients” referenced above.

5. Refer to the following statements in SED’s SUR-REPLY TESTIMONY, Chapter 1, on page 9:

Violations 61-72 were for failure to follow the Company’s internal 1988 plan to check casings of 12 wells (other than SS-25) for metal loss, as recommended by its own engineers. The 58 holes are examples of locations in well SS-25 that experienced corrosion before the failure.

a. Do YOU contend that, had SoCalGas performed Vertilog inspections in connection with the 1988 plan, SoCalGas would have detected the 58 holes in the surface casing at SS-25? If so, state all facts and produce all DOCUMENTS supporting YOUR contention.

b. Do YOU contend SoCalGas should have conducted casing inspections of the surface casing at SS-25? If so, state all facts and produce all DOCUMENTS supporting YOUR contention.

i. Identify all methods SoCalGas could have used to inspect the surface casing, including during which time period(s) those methods could have been used.

6. Refer to SED’s SUR-REPLY TESTIMONY, Chapter 1, footnote 59:

For instance, ARCO announced a tool in 1988 that would identify external corrosion on casings. (1988.0101.SPWLA-1988-UU-NN). In 2007, there is a report of ultrasonic logging tool that can view corrosion without removing tubing (2007.0924.SPE-108195-MS_NNN), in 2007 a paper by ConocoPhillips reports on a method for external corrosion and damage detection on outer and middle concentric strings of casings (2007.1111.SPE-108698-MS_NNN); Schlumberger currently markets its electronic magnetic casing inspection tool for evaluation of multiple casing strings. (SLB.em-pipescanner-br).

a. Are YOU aware of any gas storage operators that used any of the above tools as of October 23, 2015 to evaluate the integrity of surface casing, where the surface casing was adjacent to production casing cemented in a well?

b. If the answer to 6.a. is YES, identify all such gas storage operators.

7. Refer to the following statements in SED's SUR-REPLY TESTIMONY, Chapter 1, on page 16:

After the SS-25 failure, SoCalGas inspected all of its wells within a few months using its new SIMP protocol. A large number of its wells were plugged and isolated as a result of these inspections, indicating that the findings mirrored those of Frew 2 (a natural gas well owned by SoCalGas), which was severely corroded.

- a. Identify all wells that YOU contend were plugged and isolated based on casing inspection log results.
 - b. For each well identified in YOUR response to Request 8.a, state all facts and produce all DOCUMENTS supporting YOUR contention that the well was "plugged and isolated as a result of these inspections."
8. Refer to the following statements in SED's SUR-REPLY TESTIMONY, Chapter 1, on page 17:

SoCalGas must maintain ongoing knowledge of groundwater in the Aliso Canyon gas storage area, from the surface to the bottom of their deepest well because leaks through failed cement can cause groundwater contamination and water at any depth could cause corrosion of a well casing

- a. What specific tools or practices do YOU contend SoCalGas should have employed to "maintain ongoing knowledge of groundwater"?
 - b. Identify all wells at Aliso Canyon for which YOU contend there is a risk of groundwater causing corrosion at the bottom of the well.
9. Refer to the following statements in SED's SUR-REPLY TESTIMONY, Chapter 1, on page 17:

[T]he Division of Oil & Gas is not in the business of regularly monitoring groundwater depths, so it would be unwise to depend on this agency for current groundwater depths relative to each well casing.

- a. Do YOU contend that DOGGR's data regarding groundwater depths at SS-25 was inaccurate? If so, state all facts supporting YOUR contention.
- b. Do YOU contend that DOGGR does not evaluate groundwater depths as part of their enforcement of their regulation for the depth of the surface casing installed?
- c. Do YOU contend that DOGGR should not monitor groundwater depths because it "is not in the business of regularly monitoring groundwater depths"?

10. Refer to the following statement in SED's SUR-REPLY TESTIMONY, Chapter 1, on page 18:

[Violation 86] holds SoCalGas responsible for failing to use generally available industry information, as well as information that could have been obtained about its own wells to assess the relationships between well casing muds & cements, groundwater, and external corrosion of its well casings.

- a. Identify the "generally available industry information" that SoCalGas should have used "to assess the relationships between well casing muds & cements, groundwater, and external corrosion of its well casings."

11. Refer to the following statement in SED's SUR-REPLY TESTIMONY, Chapter 1, on page 22:

SoCalGas' 2016 investigations suggests findings that might have led Blade to conclude that corrosion was far more common than SoCalGas data led them to believe.

- a. State all facts supporting this contention.
- b. Produce all DOCUMENTS supporting this contention.

12. Refer to the following statements in SED's SUR-REPLY TESTIMONY, Chapter 1, on page 27:

The JITF Report goes on to state that "10-25 percent of natural gas storage wells have a full tubing string set into an 8 isolation packer." Aliso wells were all completed with tubing, therefore, Hower & Stinson conclude by this quote that Aliso Canyon's single barrier well completion (completed with tubing set in a packer) is consistent with the 'industry standard' of approximately 87% of all gas storage wells in operation in the US. But Hower & Stinson fail to note that SS-25, as well as most of the Aliso wells, were used for injection and production of high pressure gas via the 7-inch casing, not just the tubing, which is not common for any single barrier well.

- a. State all facts supporting YOUR contention that, as of October 23, 2015, it was "not common for any single barrier well" to be used for injection and production of high pressure gas.
- b. Produce all DOCUMENTS supporting YOUR contention that, as of October 23, 2015, it was "not common for any single barrier well" to be used for injection and production of high pressure gas.
- c. Explain YOUR understanding of why using a single barrier well for injection and production of high pressure gas matters?

13. State all facts supporting YOUR contention, at page 34 of Chapter 1 of SED's SUR-REPLY TESTIMONY, that "files that were scanned in late 2015 or January 2016 were more likely to accurately represent the condition of the files during the SS-25 failure event."