

SED-277

SoCalGas Response to SED Data Request 81

I.19-06-016

ALJs: Hecht/Poirier

Date Served: May 3, 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
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SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated April 17, 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.

Please refer to the attached document when answering the questions in this data request. For identification in this data request, the first page of the document has the words "Southern California Gas Company Standard Sesnon 25 Completion Profiler", and the Bates numbers on the document range from AC_BLD_0076009 to AC_BLD_0076020. The file name of the document is "AC_BLD_0076009.Core.Labs.Logs". With this document in mind, please answer the following:

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QUESTION 1:

Name all entities, including but not limited to Core Labs, who were responsible for the preparation of this document.

RESPONSE 1:

SoCalGas objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the phrase "responsible for the preparation of this document." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. The "Southern California Gas Company Standard Sesnon 25 Completion Profiler" document with Bates range AC_BLD_0076009 to AC_BLD_0076020, was issued by ProTechnics, a division of Core Laboratories.

QUESTION 2:

Name all individuals responsible for preparing this document.

RESPONSE 2:

SoCalGas objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the phrase "responsible for preparing this document." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. The "Southern California Gas Company Standard Sesnon 25 Completion Profiler" document with Bates range AC_BLD_0076009 to AC_BLD_0076020, was issued by ProTechnics, a division of Core Laboratories. Based on a review of SoCalGas' records, the following individuals from ProTechnics were identified in connection with this effort: Derek Key, Rick Kent, and Derrick George.

QUESTION 3:

Provide the titles of each individual named in response to question 2.

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RESPONSE 3:

SoCalGas objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request as overly broad and unduly burdensome to the extent it does not specify a timeframe to which SoCalGas may tailor its response. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this request to ask the titles of the individuals listed in Response 2, in November 2015, with respect to their work related to the "Southern California Gas Company Standard Session 25 Completion Profiler" document with Bates range AC_BLD_0076009 to AC_BLD_0076020. Rick Kent – Logging Engineer; Derrick George – Analyst; Derek Key – Account Manager.

QUESTION 4:

Articulate the responsibilities of each individual named in response to question 2.

RESPONSE 4:

SoCalGas objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request as overly broad and unduly burdensome to the extent it does not specify a timeframe to which SoCalGas may tailor its response. Moreover, SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "responsibilities." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 3.

QUESTION 5:

Provide all contracts between SoCalGas and each entity that are related to the preparation of this document, including but not limited to all contracts with "Core Labs".

- a. If the contract with Core Labs was identified in response to Safety and Enforcement Division Data Request 3, please identify the contract in that response.

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- b. If the contract with Core Labs was not identified in response to DR3, please explain why SoCalGas excluded it.

RESPONSE 5:

SoCalGas objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the phrases "responsible for the preparation of this document" and "Safety and Enforcement Division Data Request 3." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets the Safety and Enforcement Division Data Request 3 to mean Mr. Bruno's request to SoCalGas dated December 3, 2015, which SoCalGas responded to on December 4, 2015. The "Southern California Gas Company Standard Session 25 Completion Profiler" document with Bates range AC_BLD_0076009 to AC_BLD_0076020, was issued by ProTechnics, a division of Core Laboratories. Based on a review of SoCalGas' records, ProTechnics was subcontracted through Western Wireline. SoCalGas produced a Western Wireline contract, in response to Ken Bruno's request on behalf of SED, on December 4, 2015.

QUESTION 6:

On page 2, the customer name is Hilary Petrizzo, the Logging Engineer is Rick Kent, and the Analyst is Derrick George. Please provide the role of each of these individuals in relation to this document.

RESPONSE 6:

SoCalGas objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request as overly broad and unduly burdensome to the extent it does not specify a timeframe to which SoCalGas may tailor its response. Moreover, SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "role." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 3. Ms. Petrizzo acted as a liaison with ProTechnics, which included

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providing information and receiving and distributing the report to SoCalGas personnel. Ms. Petrizzo was not involved in the logging work or in drafting the report.

QUESTION 7:

Was this work done in response to requests or needs from Boots & Coots related to the well kill attempts of SS-25?

RESPONSE 7:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "this work," and the term "needs." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Yes.

QUESTION 8:

If so, explain.

RESPONSE 8:

The work was requested as part of running diagnostics in support of well kill operations.

QUESTION 9:

Provide all documents related to the answers to questions 7 and 8.

RESPONSE 9:

- a. SoCalGas objects to this request as unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, as the "burden, expense, or intrusiveness of this request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. N/A. See Response 7. Please see previously provided documents with Bates range AC_CPUC_SED_DR_16_0025631 – AC_CPUC_SED_DR_16_0025808.

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QUESTION 10:

Was this work done in response to requests or needs from SoCalGas related to the well kill attempts of SS-25?

RESPONSE 10:

See Response 7.

QUESTION 11:

If so, explain.

RESPONSE 11:

N/A. See Response 7.

QUESTION 12:

Provide all documents related to the answers to questions 10 and 11.

RESPONSE 12:

N/A. See Response 7.

QUESTION 13:

On page 4, the survey objectives are shown as "Identify casing and tubing breaches". On page 2, the date of survey is November 8, 2015, and the date of analysis is November 12, 2015. With these things in mind, please answer:

- a. Why did SoCalGas have reason to request this document with a survey objective to "Identify casing and tubing breaches" as of the dates shown on page 2?
- b. Provide all documents related to the answer to question 13a.

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RESPONSE 13:

- b. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "reason to request." SoCalGas further objects to this request to the extent it assumes SoCalGas' objective was to identify casing and tubing breaches or SoCalGas drafted the referenced language. Subject and without waiving the foregoing objections, SoCalGas responds as follows. The purpose of the "Southern California Gas Company Standard Sesnon 25 Completion Profiler" document with Bates range AC_BLD_0076009 to AC_BLD_0076020 was to run diagnostics of SS-25 for the objective of killing the well.
- c. SoCalGas objects to this request as overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, as the "burden, expense, or intrusiveness of this request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject and without waiving the foregoing objections, SoCalGas responds as follows. The Boots & Coots Daily Reports reference the diagnostic work on SS-25. Please see previously provided documents with Bates range AC_CPUC_SED_DR_16_0025631 – AC_CPUC_SED_DR_16_0025808.

QUESTION 14:

On or around the dates identified in question 13, did SoCalGas request any other analysis or study related to the objective shown on page 2 of this document?

RESPONSE 14:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "any other analysis or study." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 13.

QUESTION 15:

If so, why?

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RESPONSE 15:

See Response 13.

QUESTION 16:

Provide all documents related to the answer to questions 14 and 15.

RESPONSE 16:

See Response 13.

QUESTION 17:

Please review the passages on page 6 of this document that states under the "Observations" section:

"A cooling anomaly appears to detect a leak through the surface casing at ~890 (depth conformed with both down and up log pass temperatures). The reported bottom of the surface casing is 990'. . .

Summary: gas flow appears to be flowing up the tubing and exiting through a tubing failure at ~8435'. Gas flows up the tubing x production casing annulus until it exists through the surface casing at ~890'. . ."

With these passages in mind, please answer the following:

- a. When did SoCalGas first suspect a leak through the surface casing of well SS-25?
- b. What information did SoCalGas base this suspicion on?
- c. Provide documentation in support of the response to 17b.
- d. When was SoCalGas first aware of a tubing failure at ~8435'?
- e. If the answer to 17d is anything other than the Core Labs report dated November 12, 2015, provide documentation in support of the response to questions 17d.
- f. What specific problem(s) relative to killing SS-25 did the tubing failure at ~8435' present?
- g. What steps did SoCalGas or its contractors take to overcome the problem(s) identified in answer 17f.?

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h. Provide documentation in support of the answer to question 17g

RESPONSE 17:

- a. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase, "suspect a leak through the surface casing of well SS-25." SoCalGas also objects to this request to the extent it assumes SoCalGas suspected a leak through the surface casing of well SS-25. SoCalGas further objects to this request to the extent it assumes that the purpose of the surface casing is to contain gas. SoCalGas further objects to this request to the degree that it assumes that the cooling anomaly at 890' was indicative of a leak in the surface casing. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas interprets this request to ask when SoCalGas first became aware of a leak through the surface casing of well SS-25 at ~890 feet. SoCalGas is not aware of a leak through the surface casing at this depth.
- b. See Response 17.a. N/A.
- c. See Response 17.a. N/A.
- d. SoCalGas objects to this request to the extent it assumes SoCalGas suspected a tubing failure at ~8435'. SoCalGas further objects to this request to the extent it assumes that there was a tubing failure at 8435'. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. **The cross-over flow ports for SS-25 were at approximately 8451ft.**
- e. N/A. See Response 17.d.
- f. SoCalGas objects to this request as vague and ambiguous with regards to the phrase "specific problems related to killing SS-25." SoCalGas further objects to this request to the extent it assumes a tubing failure existed at ~8435' which posed "a problem relative to killing SS-25." Subject to and without waiving the forgoing objection, SoCalGas responds as follows. N/A. See Response 17.d.
- g. SoCalGas objects to this request to the extent it assumes a tubing failure existed at ~8435' which posed "a problem relative to killing SS-25." Subject to and without waiving the forgoing objection, SoCalGas responds as follows. N/A. See Response 17.d.
- h. N/A. See Response 17.d.