

SED-294

SoCalGas Response to SED Data Request 137

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  
(I.19-06-016)**

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**(DATA REQUEST SED-SCG-137 DATED JANUARY 21, 2021)**

**SOCALGAS RESPONSE DATED FEBRUARY 4, 2021**

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated January 21, 2021 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.

**Question Set 1:**

**Please refer to SoCalGas' Response to SED Data Request 129, Questions 16 and 17 for this set of questions. For reference, those responses are provided here.**

**SED Data Request 129 QUESTION 16:  
State Mr. Neville's personal responsibilities related to the Aliso Canyon Well Files prior to October 23, 2015.**

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**SoCalGas Response to Data Request 129 Question 16:  
SoCalGas objects to this request as vague and ambiguous and unintelligible, particularly with respect to the phrase "personal responsibilities."**

**SED Data Request 129 QUESTION 17:  
State Mr. Neville's personal responsibilities related to the Aliso Canyon Well Files after October 23, 2015.**

**SoCalGas Response to Data Request 129 Question 17:  
SoCalGas objects to this request as vague and ambiguous and unintelligible, particularly with respect to the phrase "personal responsibilities."**

**With these questions and responses in mind, please answer the following:**

**QUESTION 1A:**

State each date that Mr. Neville reviewed the SS-25 well file prior to October 23, 2015.

**RESPONSE 1A:**

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter . . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence."

**QUESTION 1B:**

For each date provided in response to question 1a, identify by subject matter and Bates numbers the corresponding pages from the SS-25 well file that Mr. Neville reviewed and state the reason Mr. Neville reviewed the well file records identified.

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**RESPONSE 1B:**

See Response 1A.

**QUESTION 1C:**

State each date that Mr. Neville reviewed the SS-25 well file during and after October 23, 2015.

**RESPONSE 1C:**

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter . . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence."

**QUESTION 1D:**

For each date provided in response to question 1c, provide the corresponding pages from the SS-25 well file that Mr. Neville reviewed.

**RESPONSE 1D:**

See Response 1C.

**QUESTION 1E:**

Was Mr. Neville shown questions 1a through 1d?

**RESPONSE 1E:**

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter . . . that is

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relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.”

**QUESTION 1F:**

If so, were Mr. Neville's answers to questions 1a through 1d reflected in this data response?

**RESPONSE 1F:**

See Response 1D.

**QUESTION 1G:**

If the answer to question 1f is anything other than an affirmative “yes,” please explain why Mr. Neville's answers were not reflected.

**RESPONSE 1G:**

See Response 1D.

**QUESTION 1H:**

After October 23, 2015, was Mr. Neville responsible for ensuring that the SS-25 well files were updated to include records related to the SS-25 well kill attempts?

**RESPONSE 1H:**

SoCalGas objects to this request to the extent it fails to provide a defined time period to which SoCalGas may tailor its Response. SoCalGas objects to this request to the extent it assumes specific individuals have been assigned the responsibility of updating and maintaining hard copy well files. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas interprets this request to ask information related to the time period October 23, 2015 through February 18, 2016. No.

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**QUESTION 1I:**

If the answer to 1H is NO, identify the person who was responsible for updating the SS-25 well file.

**RESPONSE 1I:**

See Response 1H.

**QUESTION 1J:**

If the answer to 1H is YES, state when Mr. Neville updated the SS-25 well file with records related to the SS-25 well kill attempts.

**RESPONSE 1J:**

N/A.

**QUESTION 1K:**

Provide all records that have been added to the SS-25 well file since October 23, 2015.

**RESPONSE 1K:**

SoCalGas objects to this request on the ground it is unduly burdensome. SoCalGas further objects to this request to the extent it seeks information previously provided to SED.

**QUESTION 1L:**

Provide all records that have been removed from the SS-25 well file since October 23, 2015.

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**RESPONSE 1L:**

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "removed." SoCalGas further objects to this request to the extent it seeks information previously provided to SED.

**QUESTION 1M:**

Provide all records in the SS-25 well file that have been amended, or altered in any way since October 23, 2015.

**RESPONSE 1M:**

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "amended, or altered in any way." SoCalGas also objects this request to the extent it seeks information previously provided to SED.

**Question Set 2:**

Please refer to SoCalGas' Response to SED Data Request 129, Question 2 and SoCalGas' Response to SED Data Request 32, Question 21, dated November 7, 2018, for this set of questions. For reference, both of these responses are provided here.

SED Data Request 129 QUESTION 2: Please confirm that SoCalGas has provided to SED every document that was or is contained in the current SS-25 well file.

- a. State how many pages are in the current hard copy SS-25 well file.
- b. Identify the names of the subsections of the hard copy SS-25 well file.

SoCalGas' RESPONSE to Data Request 129 Question 2:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "current SS-25 well file." SoCalGas further objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas also objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows

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discovery “regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please refer to SoCalGas’ November 7, 2018 response to Question 21 of SED Data Request 32 dated October 12, 2018. Please see Response 1. To the extent that well files are maintained in hard copy and in electronic databases that include records associated with the original design, construction, subsurface maintenance, and inspection data, SoCalGas has not provided the full current well file for SS-25.

For reference, SoCalGas’ Response to SED Data Request 32 Question 21 dated November 7, 2018 is as follows:

SED Data Request 32 Question 21:

Provide the well file for SS-25 as it existed between October, 2015 and February, 2016.

SoCalGas Response to Data Request 32 Response 21:

For purposes of this response, SoCalGas interprets the use of the term “well file” in the questions to mean the hard copy well files explained in Response 2.

Please note, electronic well file records are also collected in WellView and the UGS Server.

SoCalGas scanned the hard copy well file for SS-25 on or around January 2016 and these files were provided to SED on February 5, 2016 and June 3, 2016 (AC\_CPUC\_0000023 – AC\_CPUC\_0000759; AC\_CPUC\_0012338 to AC\_CPUC\_12389).

With these questions and responses in mind, please answer and provide the following:

**QUESTION 2A:**

Provide the complete well file for SS-25 as it exists today in hard copy in the Aliso Canyon Underground Storage Unit office well file cabinet shown in images in Mr.

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Neville's testimony. Scan the SS-25 well file in the exact order that folders and documents are stored in the SS-25 file folder, assigning new bates numbers to all pages.

**RESPONSE 2A:**

SoCalGas objects to this request on the ground it is unduly burdensome. SoCalGas further objects to this request to the extent it seeks information previously provided to SED.

**QUESTION 2B:**

Did SoCalGas provide all documents associated with the SS-25 well file.

**RESPONSE 2B:**

SoCalGas objects to this request to the extent it fails to provide a defined time period to which SoCalGas may tailor its Response. SoCalGas further objects to this request to the extent it seeks information previously provided to SED.

**QUESTION 2C:**

If the answer to question 2B is anything other than an affirmative yes:

- i. List which documents were not provided.
- ii. Provide a justification for not providing such documents.
- iii. Provide the documents.

**RESPONSE 2C:**

See Response 2B.

**QUESTION 2D:**

Provide all SS-25 records related to SS-25 well tubing, casing and internal (to the well) equipment inspection and maintenance from 2000 to present. SED defines "inspection and maintenance records" to include Interoffice Memos, planning documents, analysis

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of data collected, workover instructions, well kill plans, communications with contractors and analyses of results. Include in these records, all related records collected in the SS-25 Well File, WellView and the UGS Server.

**RESPONSE 2D:**

SoCalGas objects to this request to the extent it fails to provide a defined time period to which SoCalGas may tailor its Response. SoCalGas further objects to this request to the extent it seeks information previously provided to SED.

**QUESTION 2E:**

With regards to SoCalGas statement that **“SoCalGas scanned the hard copy well file for SS-25 on or around January 2016 and these files were provided to SED on February 5, 2016 and June 3, 2016”**, provide the names of all individuals:

- i. Who did this scanning.
- ii. Who were present while this scanning was done.

**RESPONSE 2E:**

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery “regarding any matter . . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.”

**QUESTION 2F:**

For each individual mentioned in response to question 2Ci and 2Cii, also answer the following:

- i. Whether they were employees for SoCalGas at the time of the scanning.
- ii. If yes, whether they are employees for SoCalGas now.
- iii. Whether they were contractors for SoCalGas at the time of the scanning.
- iv. If yes, identify the contractor and state whether the persons who did the

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- scanning are SoCalGas contractors now.
- v. Provide the contract between the contractors identified in response to 2.D.iv
  - vi. Provide a copy of the instructions, including modifications and updates to instructions, to scan the Well Files that were given to the SoCalGas employees and/or SoCalGas contractors prior to scanning well files.

**RESPONSE 2F:**

See Response 2E.

**Question Set 3:**

**Please refer to SoCalGas' Response to SED Data Request 129, Question 3, and SED Data Request 17, Question 17 for this set of questions. For reference, those responses are provided here.**

**SED Data Request 129 QUESTION 3: Identify in a list the operations and maintenance data that is or has been recorded by SoCalGas, but is not kept in a well file.**

- a. For each item listed, identify the type of file (hard copy or electronic) and where the files are kept (Office name, Building number, Street name, City).
- b. For each item listed, identify the SoCalGas and Contractor person(s) who have full access (read/write/manage) to these files and those SoCalGas and Contractor person(s) who can only view/read the files.

**SoCalGas Response to SED Data Request 129 Question 3:**

**SoCalGas objects to this request on the ground it is vague and ambiguous, particularly with respect to the phrase "operations and maintenance data." SoCalGas also objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is**

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itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please refer to SoCalGas’ April 27, 2018 response to Question 17 of SED Data Request 17 dated March 30, 2018.

**SED Data Request 17 Question 17:**

As of October 23, 2015, please identify all other terms SoCalGas used to describe the repository of information SoCalGas collects with regards to each of their wells at their natural gas storage facilities. If any of these terms identify well related documentation that is not kept in the well file, please provide the working definition of each such term, and include what information is kept that is not kept in the well file.

**SoCalGas Response to SED Data Request 17 Question 17:**

SoCalGas objects to this request as vague and ambiguous. Notwithstanding this objection, SoCalGas responds as follows: SoCalGas interprets this request as seeking information regarding digital repositories of well related information other than the well file. On October 23, 2015, in addition to the well files, SoCalGas collected electronic well file records and well related information in the following digital repositories:

- WellView
- Rig View
- OSI Soft PI
- Maximo
- SAP
- UGS Servers
- SharePoint

**WellView:** A well information management system containing well file records related to well planning, drilling, completion, testing and workovers.

**RigView:** A rig and well project scheduling system for drilling, completions,

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**workovers and testing.**

**OSI Soft PI: The repository for process information such as storage field injection and withdrawal rates, and well pressures.**

**Maximo: The maintenance management system for storage facilities. Inspection activities for the following well components are scheduled and recorded in**

**Maximo:**

**Wellhead valve**

**Surface safety valve**

**Surface-controlled subsurface safety valve**

**SAP: Invoice management system.**

**UGS Server: A storage server used to store, access, secure and manage digital data and files, including but not limited to, electronic versions of well file records and staff working files. SharePoint: SharePoint is a web-based, collaborative platform that integrates with Microsoft Office, including but not limited to, staff working files.**

**With these questions in mind, please answer the following:**

**QUESTION 3A:**

In Mr. Neville's testimony, he refers to Well Records and Well Files. State the difference. Provide all SoCalGas documentation, guidance, and standards that define "Well Record" and "Well File."

**RESPONSE 3A:**

SoCalGas objects to this request to the extent it assumes documentation, guidance, and standards exist that define "Well Record" and "Well File." SoCalGas further objects to this request to the extent it seeks information previously provided to SED. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. The hard copy well file consists of the following well records: (1) histories (2) logs, (3) surveys, and (4) invoices.

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**QUESTION 3B:**

Is it SoCalGas' position that Well File documents are stored in WellView?

**RESPONSE 3B:**

SoCalGas objects to this request to the extent it seeks information previously provided to SED. SoCalGas further objects to this request to the extent it fails to provide a defined time period to which SoCalGas may tailor its Response.

**QUESTION 3C:**

If the answer to 3B is Yes, identify the types (or categories) of documents that are stored in WellView.

**RESPONSE 3C:**

See Response 3B.

**QUESTION 3D:**

For types (or categories) of documents identified in response to 3.C, state whether these same documents are also included in the hard copy Well File kept in the Well File Cabinet pictured in Mr. Neville's testimony that holds Well Files at Aliso Canyon Underground Storage Facility.

**RESPONSE 3D:**

See Response 3B.

**QUESTION 3E:**

State the name(s) of the SoCalGas employee(s) who are currently responsible for updating and maintaining hard copy Well Files kept in the Well File Cabinet pictured in Mr. Neville's testimony that holds Well Files at Aliso Canyon Underground Storage Facility.

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**RESPONSE 3E:**

SoCalGas objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request to the extent it assumes specific individuals are assigned the responsibility of updating and maintaining well files. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. The responsibility for updating and maintaining the well files is tied to the individual(s) overseeing the operational work being performed.

**QUESTION 3F:**

At any point in time, did SoCalGas convert hard copy documents in the SS-25 well file into electronic form, and store them in WellView?

**RESPONSE 3F:**

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "convert." SoCalGas further objects to this request to the extent it fails to provide a defined time period to which SoCalGas may tailor its Response. SoCalGas also objects to this request to the extent it seeks information previously provided to SED.

**QUESTION 3G:**

Did SoCalGas extract data from the hard copy SS-25 well file for use in WellView or any other electronic databases?

**RESPONSE 3G:**

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "extract data." SoCalGas further objects to this request to the extent it fails to provide a defined time period to which SoCalGas may tailor its Response. SoCalGas also objects to this request to the extent it seeks information previously provided to SED.