

**SoCalGas-2**

**Prepared Opening Testimony of Rodger Schwecke (November 22, 2019)**

**I.19-06-016**

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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).

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## **CHAPTER II**

### **PREPARED OPENING TESTIMONY OF RODGER SCHWECKE ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)**

**(SOCALGAS IMPLEMENTED REASONABLE AND PRUDENT  
INCIDENT RESPONSE MEASURES)**

November 22, 2019

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1 **CHAPTER II**  
2 **SOCALGAS IMPLEMENTED REASONABLE AND PRUDENT**  
3 **INCIDENT RESPONSE MEASURES**  
4

5 **I. INTRODUCTION.**

6 From the day the leak at Well Standard Sesnon 25 (“SS-25”) was discovered until it was  
7 extinguished, Southern California Gas Company (“SoCalGas”) acted expediently and undertook  
8 extensive and reasonable efforts to control the leak while maintaining safety.

9 SoCalGas acted reasonably with respect to the initial well top kill effort, and, when that  
10 was unsuccessful, immediately hired one of the preeminent well kill experts in the world and  
11 appropriately oversaw the well kill contractor’s well control operations with safety at the  
12 forefront. Out of an abundance of caution and prudence, within two days of discovering the  
13 leak, SoCalGas began considering and preparing a contingency plan for a relief well in case a top  
14 well kill was not successful. SoCalGas’ early efforts to prepare for a relief well expedited the  
15 later drilling of the relief well to intercept the leaking well over 1.5 miles underground and stop  
16 the leak.

17 In parallel to the well kill efforts, SoCalGas undertook extensive efforts to maintain site  
18 safety and security, and plan and develop efforts to mitigate leak impacts. In undertaking these  
19 efforts, SoCalGas managed challenges related to weather and site conditions that changed on a  
20 daily basis (even multiple times a day), as well as the uncertainty associated with addressing an  
21 unobservable leak, hundreds of feet below the surface, and the complexity and precise nature of  
22 drilling the relief well. Managing these activities entailed procuring dozens of vendors for  
23 services and materials, having hundreds of people on site who in turn also had to be managed  
24 and coordinated, and working closely with numerous agencies, including the California Public  
25 Utilities Commission (“CPUC”) and Division of Oil, Gas, and Geothermal Resources  
26 (“DOGGR”).

27 SoCalGas acted reasonably in administering these efforts simultaneously at the site and  
28 ultimately killing the leaking well in 111 days. Notably, despite the significant risks associated  
29 with this leak, and the hundreds of visitors to the site, SoCalGas completed the operation without  
30 fire or reportable incidents of significant injury or harm at the site.  
31

1 **II. SOCALGAS REASONABLY AND PRUDENTLY RESPONDED TO DISCOVERY**  
2 **OF THE SS-25 LEAK.**

3 On October 23, 2015, an employee of The Termo Company, which operates native oil  
4 production wells within the Aliso Canyon area, smelled gas near the SS-25 well pad and alerted  
5 SoCalGas personnel. SoCalGas personnel were quickly dispatched to the site to investigate the  
6 source of the odor. At the time, SS-25 was injecting gas into the underground gas reservoir.  
7 SoCalGas personnel immediately stopped injection by closing the wellhead valves. However,  
8 SoCalGas personnel could still hear gas moving through the assembly. The personnel reported  
9 the unusual observation to a SoCalGas drilling manager, who instructed his drilling crew to  
10 mobilize the necessary equipment to stop the flow of gas from the reservoir, or “kill” the well.  
11 SoCalGas crews mobilized resources, including wireline trucks, pump trucks, and vacuum  
12 trucks, which were on site or mobilized to the facility.

13 Top well kills (also referred throughout this testimony as “well kills”) are common  
14 procedures at natural gas storage fields. They are performed when a well is suspected of having  
15 a leak, and also more commonly to kill a well for purposes of a workover in connection with  
16 conducting routine inspections and maintenance activities. To perform a well kill, weighted  
17 fluid (typically a brine solution) is pumped down the well. As the fluid fills the wellbore, the  
18 weight of the fluid overcomes the pressure of the gas being pushed up from the reservoir. When  
19 the downward force of the fluid weight, known as a hydrostatic head, balances the upward force  
20 of the pressurized gas, the well becomes isolated from the reservoir and stops any flowing gas,  
21 and the well is “killed.” Well kills are typically performed by pumping fluid into a well’s tubing,  
22 which is the smaller steel pipe within the well’s production casing that extends from the surface  
23 to nearly the depth of the reservoir. During a tubing kill procedure, fluid is pumped down the  
24 tubing, then exits through ports in the bottom of the tubing into the production casing, just above  
25 the reservoir depth.

26 On October 24, 2015, SoCalGas conducted a tubing kill on SS-25. While the tubing kill  
27 was occurring, the tubing pressure began to increase rapidly, indicating a possible blockage in  
28 the tubing at a relatively shallow depth. Accordingly, the tubing kill attempt was aborted, and  
29 SoCalGas then attempted to pump fluid directly into the annular space between the production  
30 casing and tubing to bypass the potential tubing blockage. This operation also failed to stop the  
31 leak. While executing that procedure, SoCalGas observed fractures in the earth spreading out

1 from the wellhead, and additional gas flow was noted through the cracks in the ground.  
2 SoCalGas personnel immediately shut down the well kill attempt and evacuated to a safe area.

3         Based on the outcome of the initial well kill attempt, SoCalGas determined it would  
4 require the assistance of specialized well control experts.<sup>1</sup> On Saturday October 24, 2015  
5 SoCalGas contacted Boots & Coots to evaluate SS-25 and assist with the well control operation.  
6 Boots & Coots is among the world’s foremost well control specialists and emergency well  
7 responders. Boots & Coots is particularly well known in the oil and gas industry for  
8 extinguishing several hundred oil well fires intentionally set by Iraqi soldiers during the Persian  
9 Gulf War. SoCalGas provided Boots & Coots personnel with information regarding the SS-25  
10 well and the pending situation before they traveled so they were familiar with the well design on  
11 arrival and prepared to take action. Boots & Coots’ team arrived from their headquarters in  
12 Texas the following day, October 25th, to evaluate SS-25 and develop a plan to control the well.

13 **III. SOCALGAS SAFELY AND PRUDENTLY MANAGED THE LEAK RESPONSE.**

14         Facilitating the well kill efforts required the procurement, coordination, and management  
15 of numerous activities, materials, and people. These needs evolved over time, and SoCalGas  
16 undertook tremendous efforts under these extraordinary circumstances.

17         SoCalGas officers were engaged immediately and were present throughout the incident to  
18 provide leadership and oversight. The personal involvement of the highest levels of SoCalGas  
19 management provided safety oversight, expertise, support, and resources. Executive leadership  
20 established safety as the paramount consideration in all activities related to the leak response.

21 **A. Institution of Formal Emergency Response System.**

22         On October 31, 2015, SoCalGas executive leadership instituted a formal emergency  
23 response system to enable effective, timely, and efficient management of the response to the  
24 leak. This system was staffed with executives and senior personnel. Later, SoCalGas converted  
25 this system to an incident command system (“ICS”) to provide a common organizational

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<sup>1</sup> To the best of my knowledge and based on my experience in gas storage operations at SoCalGas, well control efforts by “top kill” are typically successful in controlling leaking wells. SoCalGas employs personnel who are equipped to perform routine well kills. On rare occasions, however, SoCalGas must engage well control specialists when it encounters a well control issue that presents a unique challenge. To my knowledge, SoCalGas has required the assistance of a well control specialist on only one prior occasion that occurred in the 1970s. However, unlike the SS-25 leak, that incident involved a failure of surface piping near the wellhead, not a below-ground leak in the production casing.

1 structure modelled after FEMA’s Incident Command System to manage all aspects of the  
2 incident response.<sup>2</sup> Through the ICS, SoCalGas centralized processes for responding to the  
3 incident, identified individual responsibilities, and established a dedicated team with authority  
4 and resources to address the leak response. Throughout SoCalGas’ incident response, there was  
5 significant and regular engagement by regulatory agencies, local, state and federal elected  
6 officials, and first responders. The ICS established uniform communication standards and  
7 coordinated interagency and interdepartmental cooperation. The ICS held several daily meetings  
8 to coordinate activities and keep regulators and other agencies and officials informed of activities  
9 and status. SoCalGas held daily safety meetings with those on site to discuss site conditions and  
10 safety considerations, and held separate daily morning briefings with various governmental  
11 authorities, including: Los Angeles County Fire, Los Angeles County Department of Health,  
12 Los Angeles City Fire, California Office of Emergency Services, South Coast Air Quality  
13 Management District (“SCAQMD”), Environmental Protection Agency Region 9, Department of  
14 Transportation Pipeline and Hazardous Materials Safety Administration, and others to discuss  
15 the work planned for the day. SoCalGas provided regular updates to a wide range of agency and  
16 elected officials such as California Air Resources Board, City and County of Los Angeles, and  
17 former Governor Brown’s Office. SoCalGas engaged in regular and detailed discussions with  
18 our regulators, first responders, and elected officials to promote safety, transparency, and  
19 understanding of SoCalGas’ undertakings.

20 SoCalGas later formed a Unified Command with Los Angeles County Fire Department  
21 and Los Angeles County Department of Public Health to help manage the response to the  
22 incident. Each morning the Unified Command held a meeting to update agencies, first  
23 responders, and contractor personnel on the occurrences at the facility, with subsequent meetings  
24 held throughout the day.

25 **B. Safe Management of Operations Across the Aliso Canyon Facility.**

26 SoCalGas’ foremost concern was to safely manage the Aliso Canyon field and the  
27 activities conducted there so that each person who arrived at the site also left the site safely. The  
28 leak response involved an unprecedented level of activity at the site, with hundreds of

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<sup>2</sup> ICS is an approach to incident management that provides an integrated organizational structure designed to better enable a multi-level emergency response.

1 contractors, regulators, agency personnel, and other public officials coming and going on a daily  
2 basis, often with equipment and supplies.

3 i. Maintaining Site Safety.

4 In order to promote site safety, SoCalGas established restricted areas, site security and  
5 safety protocols, and evacuation plans. Its efforts entailed deploying appropriate safety and  
6 security personnel on site and in the surrounding community. This included engaging private  
7 security, paramedics, and fire control services. A certified industrial hygienist was engaged to  
8 oversee multiple safety and health representatives to continuously monitor gas at certain  
9 designated areas and periodically check gas levels at other areas near the SS-25 well site.  
10 Security personnel established multiple security checkpoints within the facility and restricted and  
11 controlled access to various points throughout the storage field, including the SS-25 site. As an  
12 extra level of precaution, SoCalGas constructed a helicopter pad to enable rapid emergency  
13 response.



14  
15 *Newly Constructed Helipad*

16 These measures promoted the safety of employees, contractors, regulatory agency  
17 personnel, and first responders who arrived at the site to assist with and monitor well control  
18 efforts.

19 ii. Managing Access to the Well Site.

20 The Aliso Canyon storage facility is located on approximately 3,600 acres in the Santa  
21 Susana mountains. There is only one main road within the facility, with the remaining terrain

1 largely rugged. Wells are located throughout the facility and can be miles away from the  
2 entrance gate at elevations exceeding 3,300 feet. The SS-25 well pad site is relatively small and  
3 located at the end of a narrow road at the top of a large hill, about one mile from the entrance  
4 gate at an elevation of about 2,920 feet. Due to the narrow one-way roads and many locations of  
5 single vehicle passage throughout the field, and to promote safety and avoid disturbing and  
6 damaging the fauna living outside the roadway, the speed limit on internal roads is 15 miles per  
7 hour.<sup>3</sup> These conditions make moving personnel and equipment around the site challenging.  
8



9  
10 *The Aliso Canyon Facility*

11 The leak response resulted in a significant and regular presence of regulatory agency  
12 personnel, state and federal elected officials, and first responders, and brought hundreds of  
13 people to the storage facility.<sup>4</sup> For example, DOGGR, SCAQMD, and Los Angeles County Fire  
14 Department and other first responder representatives were regularly on site and assisting with the  
15 incident. DOGGR's presence was significant, as the agency with the most operational expertise,  
16 and included reviewing several of the well kill plans prior to the work being performed.

17 SoCalGas retained traffic control specialists and implemented traffic control operations to  
18 maintain safety and manage significant traffic loads, including emergency response vehicles and

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<sup>3</sup> SoCalGas is not the only operator within this location – there are two unaffiliated oil companies that also work within the boundaries of the Aliso Canyon area and share the same roads.

<sup>4</sup> Well control efforts were also impacted when regulators or officials visited the site. Separately, on at least one occasion, work was impacted when a plane performed an unauthorized fly-over and flew too close to the leaking well, creating an additional safety risk.

1 heavy well kill and relief well equipment over rugged terrain. In addition to facilitating safe  
2 access to the well site, SoCalGas undertook efforts to provide work areas to stage equipment and  
3 hold daily morning meetings to discuss site conditions and plan the daily activities for hundreds  
4 of workers, including first responders and agency representatives. Office trailers and parking  
5 lots were installed for use by emergency responders, governmental agencies, and operations  
6 personnel. They were installed incrementally because, as the well control efforts continued  
7 longer than expected, additional regulators, agencies, and officials came to the site, requiring  
8 increasing accommodations. Cellular capabilities in the remote area were limited, so SoCalGas  
9 built out additional communication infrastructure, including running fiber optic cables to key  
10 points around the facility.

11 iii. Challenging Weather Conditions.

12 SoCalGas' foremost consideration was to maintain the safety of the site and on-site  
13 personnel. Weather conditions, which were generally rainy, cold, and windy, presented  
14 additional challenges that had to be overcome. As the storage facility is in the mountains, it is  
15 prone to extreme weather conditions, particularly in the late autumn and winter months. Wind  
16 gusts in the area made conditions challenging, with windspeeds regularly reaching 60-70 miles  
17 per hour, and on some days being as high as 90 miles per hour.

18 In addition to the wind, on-site personnel contended with rain and heavy fog that  
19 impacted site safety, stability, and visibility. One particular rainfall necessitated bringing 1,000  
20 sandbags to the SS-25 well site in one day in order to mitigate the impacts of the rain and allow  
21 continued work. When rain was anticipated, SoCalGas took steps to reduce erosion, address  
22 road and site stability, and install sandbags and catch-basins to prevent water influx into the area  
23 immediately around SS-25 and water discharge off the site.

24 By my best estimate, these weather conditions caused the delay or cessation of well  
25 control operations at the site on 38 days of the 111-day period. However, even while active well  
26 kill efforts were suspended, ancillary activities and planning continued. Additionally, work on  
27 the relief well continued 24 hours a day, 7 days a week, provided conditions were safe for such  
28 operations.

29 iv. Mitigation Efforts.

30 Also during the pendency of the leak, SoCalGas took reasonable and prudent action to  
31 implement other measures to reduce leak impacts and comply with the requests of regulators.

1 SoCalGas ceased injection into the Aliso Canyon storage facility and initiated withdrawals to  
2 lower reservoir pressure to support well kill efforts and reduce the amount of gas released.

3 At the direction of regulators, SoCalGas considered whether Aliso Canyon inventory  
4 could be more expeditiously reduced by flaring or venting; however, it was determined that site  
5 and safety factors undermined the reasonableness of pursuing either. SoCalGas also submitted a  
6 Proposed Methane Mitigation Measures Plan to the SCAQMD which explored blending a food-  
7 grade biodegradable odor suppressant (“ODEX”) to mist in the immediate vicinity of the SS-25  
8 well site; after demonstrating the misting at SoCalGas’ Pico Rivera facility, however, SCAQMD  
9 conveyed it would not issue a permit for its use. SoCalGas engaged experts, prepared  
10 engineering drawings, obtained incinerators, began fabricating piping, and worked with  
11 regulators on gas capture opportunities; however, these efforts were abandoned because of the  
12 risk of ignition. CNG trailers were also considered to capture gas, but were determined not to be  
13 viable due to the possibility of oxygen entrainment in the gas stream, the complexity of multiple  
14 stages of compression, horsepower requirements, and pipeline capacity.

15 **IV. SOCALGAS REASONABLY AND PRUDENTLY MANAGED ITS WELL KILL**  
16 **EXPERT AND OVERSAW THE WELL KILLS.**

17 SoCalGas’ priority was to safely and quickly kill the leaking well. To this end, SoCalGas  
18 engaged and oversaw Boots & Coots and other on-site contractors with specialized and technical  
19 expertise.<sup>5</sup> SoCalGas’ management of the well kill operation, based on what was known to it at  
20 the time, was reasonable and prudent: SoCalGas maintained a safe site, engaged contractors  
21 with demonstrated expertise, provided necessary information, reviewed Boots & Coots’ well kill  
22 plans, and engaged with regulators on proposed facility and well control activities.

23 **A. Well Control Operations Could Only Proceed After Appropriate Safety**  
24 **Measures.**

25 The foremost concern during a gas leak is the risk of ignition due to the presence of  
26 methane. As a result, adherence to safety protocols is paramount, even if it delays operations.

27 SoCalGas implemented affirmative on-site safety measures to control the risk of ignition  
28 at the leaking well pad, including eliminating ignition sources such as vehicle engines, cell  
29 phones, cameras, and other electronic equipment. SoCalGas also managed and timed operations

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<sup>5</sup> During the incident, SoCalGas oversaw and managed numerous contractors, with approximately 15-20 independent contractors working on SS-25 alone, to provide trucking services, wireline services, well kill services, vacuum trucks, pump trucks, cranes, safety services, etc.

1 activities to mitigate safety and ignition risks. While these efforts successfully minimized  
2 ignition sources and enhanced safety, they also created time consuming work processes and  
3 resulted in necessary delays.

4 Each day, a health and safety specialist assessed the well site before work began and  
5 monitored gas concentrations throughout the day to determine if safety risk (i.e., explosive  
6 levels) had been exceeded and work should be delayed. For all operations on the SS-25 well  
7 pad, work was limited to daylight hours for safety reasons. When daily well kill operations were  
8 complete, provided safety allowed, personnel would prepare for the next work day. At the end  
9 of each work day, the site was swept to confirm all personnel had left and overnight conditions  
10 were safe.

11 Even when conditions were deemed safe enough to conduct operations, all work had to  
12 be undertaken with extreme caution. Equipment that posed an ignition risk could not be used  
13 when gas concentrations were too high, which delayed work. For example, SoCalGas and  
14 contractor personnel would remove equipment at the end of the workday to mitigate ignition risk  
15 and secure the site, only to have to transport and reassemble the equipment back at the site the  
16 next day. Another example: when a wireline truck was required for diagnostic work, personnel  
17 had to carefully move the truck on site, install a lubricator to feed the wireline downhole, and  
18 transport and erect a crane to set the lubricator and run the wireline through the lubricator. This  
19 process was precise and methodical and, as a result, preparation for well site work could take  
20 half the day or longer, and could only be pursued if sufficient time remained after these activities  
21 to conduct the operation during daylight hours.

22 With this focus on safety, SoCalGas and Boots & Coots completed multiple well kill  
23 attempts.

24 **B. Initial Assessment (October 25, 2015 – November 6, 2015).**

25 Boots & Coots spent its first days on site evaluating the downhole blockage, determining  
26 that the blockage was a hydrate, and working to clear the hydrate, while minimizing ignition risk,  
27 in order to allow it to proceed with the well kill attempt.

28 On October 25, 2015, Boots & Coots began assessing SS-25 and determined that the  
29 obstruction in the SS-25 tubing was a hydrate. Boots & Coots further determined that the  
30 hydrate should be cleared so that additional diagnostic testing could be conducted by lowering

1 sensors and other measurement tools through the tubing and so a well kill attempt could be  
2 undertaken through the tubing.

3 Procuring the necessary equipment to clear the hydrate was a logistical and regulatory  
4 challenge. On October 29, 2015, Boots & Coots advised that the best tool for clearing the  
5 hydrate was a specialized piece of heavy machinery known as a coiled tubing unit that has the  
6 capability to snake a flexible tubing tool down the length of tubing. Coiled tubing units typically  
7 operate with internal combustion engines. That was not a viable option at the SS-25 well site  
8 because of ignition risk. Even an electricity-powered coiled tubing unit would need to be  
9 designed in such a way as to eliminate any possibility of ignition, e.g., by insulating electrical  
10 connections. Boots & Coots was able to locate a specialized unit with the necessary  
11 specifications and safety features in Louisiana.

12 Transporting the unit from Louisiana to the SS-25 site at Aliso Canyon was challenging.  
13 Shipping the unit across state lines required special permits that had to be obtained from the  
14 California Governor’s office on an expedited basis. Moving the large unit through the winding  
15 roads at Aliso Canyon to the SS-25 site was also extremely difficult and dangerous work—the  
16 SS-25 wellhead is located on a small ridgeline, and the site itself has little room for large  
17 equipment. Finally, because of the specialized nature of the equipment and work, it required an  
18 additional permit from DOGGR.



*Coiled Tubing Unit on SS-25 Well Site*



Crane on SS-25 Well Site

1  
2 The process of procuring the specialized coiled tubing unit to clear the hydrate was time-  
3 consuming but essential. On November 1, 2015 (nine days after the leak was discovered and  
4 seven days after Boots & Coots arrived on site), the specialized coiled tubing unit arrived at  
5 Aliso Canyon. On November 4, 2015, the DOGGR permit to operate the unit was received, and  
6 on November 6, 2015, Boots & Coots used the coiled tubing unit to successfully clear the  
7 hydrate from the SS-25 tubing.

8 While Boots & Coots was preparing to clear the hydrate, SoCalGas performed other  
9 activities around the field to prepare for the commencement of the well kill operation. SoCalGas  
10 killed the other wells on the well pad, SS-25A and SS-25B (and covered them with fire shields to  
11 protect them), performed barholes and gas leak surveys throughout the field to further investigate  
12 the leak,<sup>6</sup> and performed a site stability assessment around the well site to confirm the safety of  
13 the slopes surrounding SS-25. SoCalGas also began preparing the relief well (discussed further  
14 below) and continued to procure resources and perform tasks needed to support the well kill  
15 operation, including additional wireline trucks, cranes, pump trucks, and associated personnel  
16 and materials to hold on standby and to support future operations.

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<sup>6</sup> Due to the unusual nature of the incident, additional data was attempted to be obtained with respect to the location and extent of the damage to SS-25 to help inform the well kill. The exact depth and size of the damage to SS-25 was unknown throughout the 111 days of the leak and did not become apparent until the well was killed and operations were performed during the Root Cause Analysis by Blade Energy Partners.

1           **C.     Sequential Top Kill Attempts (November 7, 2015 – December 22, 2015).**

2           From November 7, 2015 through December 22, 2015, Boots & Coots implemented six  
3 well kill attempts on SS-25 (while the relief well was planned, spudded, and underway). During  
4 this period, the nature of the leak appeared to change, as did the conditions at the site. While the  
5 incident and site changed, SoCalGas' primary objective remained the same—to safely kill the  
6 well.

7           SoCalGas consulted with Boots & Coots and provided input in the development and  
8 review of well kill plans, along with various agencies and other outside experts and consultants,  
9 including additional well control specialists who were retained and the Department of Energy's  
10 National Laboratories. Throughout this process, SoCalGas reasonably relied on Boots & Coots'  
11 (and others') considerable experience and specialized expertise with complex well kill  
12 operations.

13           After the hydrate was removed on November 6, 2015, Boots & Coots was able to  
14 perform additional testing with diagnostic equipment, including temperature and noise tests  
15 through the tubing, to assess the conditions in the well. These tests identified the presence of  
16 cooling and temperature anomalies, which could be indications of locations of casing damage  
17 along the upper portion of the well casing. The cooling zones in the casing complicated and  
18 constrained well kill options because the introduction of fluid into the well could cause the  
19 formation of another hydrate.

20           While Boots & Coots was diagnosing SS-25, SoCalGas continued to provide oversight  
21 and support. On November 11, 2015, in order to decrease the pressure in the reservoir and  
22 potentially enhance the ability to conduct a successful well kill attempt, SoCalGas purposefully  
23 began withdrawing gas from the field (even before either the CPUC or DOGGR directed  
24 SoCalGas to do so).<sup>7</sup>

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<sup>7</sup> SoCalGas reduced the flow from the SS-25 leak immediately following discovery of the leak by ceasing to inject gas into the well, then ceased Aliso Canyon field injections altogether; and subsequently began to aggressively withdraw gas from the facility on November 11, 2015 to draw down the gas stored in the facility and decrease the pressure in the field and the velocity of gas flowing through the SS-25 leak. SoCalGas prioritized the use of gas from the Aliso Canyon facility to supply customer demand and, as a result, withdrew natural gas from the field at higher rates than typical for that time of year and weather conditions. This withdrawal effort reduced the amount of gas that was released into the air. SoCalGas ceased these withdrawals when SoCalGas received a letter on or about January 21, 2016 from the CPUC directing SoCalGas to maintain 15 billion cubic feet of natural gas in the Aliso Canyon storage facility due to reliability concerns.

1           The weather complicated the kill attempts and delayed several days of activity during  
2 well kills 2-7. The extremely high wind conditions noted in Section II, in combination with gas  
3 emitted from the leak, could elevate ignition risks associated with operating equipment and pose  
4 safety risks while operating the cranes and wirelines necessary to perform diagnostic work on the  
5 well. In addition to the wind, on-site personnel had to contend with rain and heavy fog that  
6 impacted site stability, visibility, and safety, as noted in Section II.

7           On November 13, 2015, Boots & Coots executed its first kill attempt through the coil  
8 tubing unit (the second kill attempt overall), but the operation did not stop the flow of gas up the  
9 well. Fluid pumped into the well appeared to escape into the surrounding subsurface formation  
10 and fluid appeared at the surface of the well pad rather than remaining in the wellbore, where it  
11 could build sufficient weight to counterbalance the upward force of the gas.

12           After two days of further planning and diagnostic work, on November 15, 2015, Boots &  
13 Coots conducted the third overall well kill attempt at SS-25, which was also unsuccessful in  
14 stopping the flow of gas up the well. During this third well kill attempt, kill fluid began  
15 returning to the surface through the soil, and a crater began forming around the SS-25 wellhead.  
16 The crater around the wellhead introduced new complications in planning and carrying out  
17 subsequent well kill attempts. Personnel could no longer easily access the wellhead, and the  
18 heavy equipment that is typically used in such operations could not be placed near the wellhead  
19 due to the instability of the soil. The crater increased the difficulty and danger involved in well  
20 control activities and required additional precautions to maintain safety. In order to keep the area  
21 safe and workable, SoCalGas took action to manage the fluid discharge once it reached the  
22 surface with on site vacuum trucks and pumps.

23           Subsequent well kill attempts were made on November 18, 2015, November 24, 2015,  
24 and November 25, 2015. With each successive kill attempt, the crater expanded in both width  
25 and depth. Following each kill attempt, Boots & Coots performed diagnostic work to understand  
26 and assess the well. Weather continued to create challenges, with wind conditions hampering or  
27 delaying activities and creating unsafe site conditions that had to be mitigated. A pumping  
28 location was constructed away from SS-25 to avoid further delays related to weather and  
29 methane levels exhibited at SS-25, which included installation of piping down from the SS-1  
30 well site located typically upwind from SS-25. Additionally, SoCalGas designed and  
31 constructed (with Boots & Coots) a bridge to span the crater, help manage fluid discharge, allow

1 easier and safe access to the wellhead, and help stabilize the wellhead, which had moved during  
2 the kill attempts. The bridge was engineered, constructed, moved onto the location, and  
3 maintained in a particular manner not only to facilitate future well kill and mitigation efforts but  
4 also to comply with unforeseen requirements imposed by OSHA, which added to the time and  
5 complexity needed to complete this task.

6 On December 22, 2015, Boots & Coots, with the assistance of the additional well kill  
7 experts and the National Laboratories, conducted the seventh top well kill attempt. The kill  
8 attempt was, again, unsuccessful. At this point, given the wellhead and site conditions, and the  
9 size of the crater around Well SS-25, we had safety concerns about proceeding with any further  
10 top kill attempts. After discussions and collaboration with Boots & Coots, other experts and  
11 consultants, and the various agencies involved in overseeing efforts to control the well,  
12 SoCalGas made the decision to cease further top kill attempts at SS-25 due to safety concerns.  
13 SoCalGas transitioned all its efforts to the relief well and potential leak mitigation measures.

14 **V. SOCALGAS REASONABLY AND PRUDENTLY PLANNED AND PREPARED A**  
15 **RELIEF WELL TO STOP THE LEAK (OCTOBER 25, 2015 – FEBRUARY 18,**  
16 **2016).**

17 SoCalGas' approach to the leak was diversified.<sup>8</sup> Even in the earliest stages, SoCalGas  
18 worked on parallel tracks to develop contingency plans in the event top kill efforts were  
19 unsuccessful. On October 25, 2015—two days after the leak was discovered—SoCalGas  
20 directed drilling rig operators who had just finished drilling a separate well at the field to keep  
21 the workover rig on site, rather than demobilizing the rig and removing it from Aliso Canyon, in  
22 case it was needed to drill a relief well to stop the SS-25 leak. Ultimately, it was this rig that was  
23 used to drill the relief well that successfully killed the SS-25 leak. SoCalGas also held additional  
24 crews and equipment (including wirelines, cranes, and bulldozing equipment for site preparation)  
25 on standby to avoid any delay. By having maintained the correct resources and capabilities on  
26 site, SoCalGas was able to start drilling the relief well quickly.

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<sup>8</sup> Each well kill attempt was expected to control the well. Nevertheless, even while top kill efforts were proceeding and the relief wells were being pursued, SoCalGas was considering other alternatives in the event that both relief wells and top kill efforts were not effective: (a) pumping operations from SS-25; (b) using coiled tubing to kill the well from the surface; (c) engaging in surface intervention with a snubbing unit; and (d) continuing withdrawal from the field as needed until the well leak stopped from fluid loading.

1 SoCalGas started considering a relief well (e.g., re-drilling wells to intersect SS-25 and  
2 identifying well sites for relief wells) in late October. SoCalGas later worked with a contractor  
3 team on two relief wells—one primary and one backup. The relief wells were arranged to be  
4 drilled near the SS-25 site at an appropriate distance and location. These wells would intercept  
5 the SS-25 wellbore at the depth of the reservoir and then pump drilling mud through the relief  
6 well to kill the well below ground near the bottom of the well bore—a “bottom kill.” The second  
7 relief well was intended be used only in the event the first relief well was not successful.

8 Detailed site planning for Relief Well 1 began in early November 2015. The relief well  
9 needed to be sited at a location with certain specific characteristics to navigate the other wells  
10 intersecting the facility and to intercept SS-25 while maintaining a safe distance from SS-25 to  
11 avoid safety risks. Locating an appropriate spot on the surface to drill the relief well was time-  
12 consuming and challenging because (1) Aliso Canyon’s hilly terrain limits where a drilling rig  
13 can be accommodated, (2) the relief well would need to be sited close enough to SS-25 to  
14 intercept the damaged well, but not so close as to raise safety concerns, and (3) the path of the  
15 relief well would need to account for Aliso Canyon’s complex subsurface geology, including the  
16 presence of many other underground wells.

17 Furthermore, it takes time to plan and drill relief wells. A relief well is a complex and  
18 challenging process. Drilling a relief well requires extreme precision, as the drill bit must  
19 intercept the rounded side of the leaking casing on a target area the size of the side of a dinner  
20 plate, more than 8,000 feet below the surface of the earth. Drilling a relief well proceeds in  
21 incremental steps because drilling and identifying the proximity of the drill bit in a three-  
22 dimensional space can occur neither simultaneously nor quickly. Instead, the drilling tool must  
23 be pulled out of the hole so that ranging equipment can be run in its place; then, once the precise  
24 location of the drill bit is known, the ranging equipment is removed, the drill bit is re-inserted,  
25 and it can proceed slightly further; and the process is repeated many times over.

26 After a site for the first relief well had been selected, on November 17, 2015, two days  
27 after the third well kill attempt, SoCalGas filed a Notice of Intention with DOGGR to drill a  
28 relief well. In anticipation of DOGGR’s approval, SoCalGas directed Boots & Coots to dispatch  
29 relief well personnel to Aliso Canyon. Boots & Coots’ relief well personnel arrived at Aliso  
30 Canyon to review directional data and prepare a specific drilling plan. On November 23, 2015,  
31 SoCalGas received a permit from DOGGR to drill relief well P-39A. Two days later, Boots &

1 Coots presented its relief well drill plan. SoCalGas built a well pad (approximately 1,500 feet  
2 from SS-25), which entailed grading, compaction, and leveling to support the weight of the rig.  
3 From November 30 through December 3, SoCalGas, Boots & Coots, and other contractors  
4 moved and erected the drilling rig on to the newly built well site, installed the conductor needed  
5 to drill the hole, and began final preparation to start drilling the relief well.

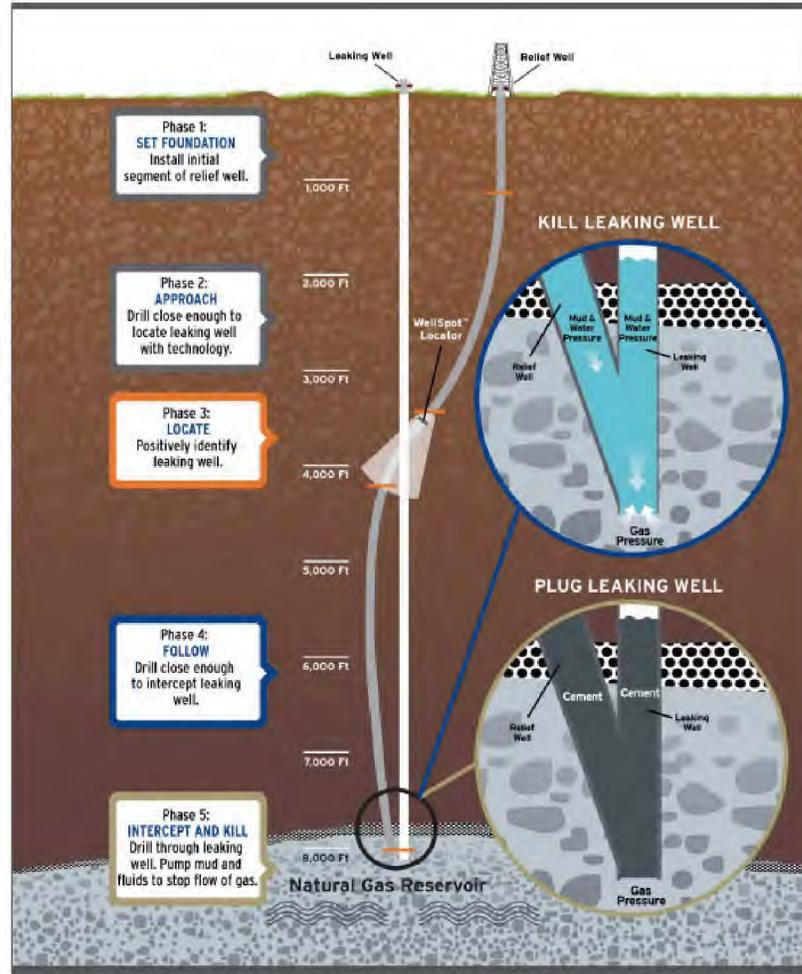
6 Initial drilling rig setup, spudding, cementing activities, and logging runs occurred  
7 between December 3 and December 14, 2015. On December 4, 2015 SoCalGas began drilling  
8 Relief Well 1. The relief well operation included the drilling, running, and cementing of the  
9 surface casing. After that, efforts began to drill to the depth of approximately 8,600 feet and set  
10 a second string of casing. From December 15 to December 21, 2015, Boots & Coots and other  
11 contractors drilled to approximately 3,800 feet, where they installed intermediate casing. From  
12 December 22, 2015 to January 16, 2016, numerous “ranging” runs occurred to determine the  
13 geo-spatial position of the well and to make sure no other underground wells were intersected  
14 during the process.<sup>9</sup> From January 17 to February 10, 2016, when the relief well was  
15 approximately 600 feet from the interception point and the drilling approached the interception  
16 point, the number of “ranging” runs increased as it is necessary for the trajectory of the well to  
17 be within very tight parameters for an appropriate intercept.  
18

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<sup>9</sup> A ranging run is a necessary but time-consuming process. For each ranging run, we had to “trip in” and “trip out,” which means we would remove the drill string from the hole and then lower the drill string back to the hole bottom. This was a prerequisite step so we could measure the amount of progress made, run any diagnostic tools to understand location and orientation (this entailed attempting to run a gyro tool down SS-25 and nearby SS-25B), and then decide how to proceed to intersect SS-25 safely and accurately at the appropriate angle and depth. As a result of this unavoidable process, a ranging run could take an entire day. As the relief well got closer to its target, the drilling work slowed as more precision was required to avoid intercepting the well too early, drifting away from the target, or hitting other well bores. Twenty-nine separate ranging runs were undertaken as part of the relief well interception effort. See Exhibit 1.

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The relief well process is depicted below.



Throughout this timeframe, and following cessation of top well kill attempts, SoCalGas worked to monitor and maintain the SS-25 well site and make the site ready for intervention and the bottom kill. Boots & Coots continued to run diagnostic tools in SS-25 to prepare for the bottom kill. SoCalGas continued to work to manage site risks, including managing erosion and site and soil stability. SoCalGas also secured the SS-25 wellhead, cleaned and maintained the site, and installed piping in preparation for the intercept and bottom kill.

While work was proceeding on Relief Well 1, SoCalGas began grading and site preparation for the second relief well as an additional contingency. Relief Well 2 also faced siting constraints and required the procurement of a specialized drilling rig.

1 On February 10, 2016, Relief Well 1 successfully made a “soft touch” on the SS-25  
2 wellbore at a depth of approximately 8,600 feet underground. The next day, after 69 days of  
3 drilling, performing ranging runs, and analyzing data, Relief Well 1 intercepted and brought the  
4 leak in SS-25 under control by pumping heavy fluids directly into the bottom of SS-25’s  
5 wellbore. At this time, DOGGR declared the well temporarily killed.

6 From February 12, 2016 through February 15, 2016, Boots & Coots pumped cement from  
7 Relief Well 1 into SS-25 to plug the well. In addition, wireline logging of SS-25 was conducted  
8 to validate the well had been killed and sufficient depth of cement was placed at the base of SS-  
9 25 to permanently seal the well. At this time, Relief Well 2 was in the initial stages of  
10 commencing drilling, but work was stopped with the successful intercept and killing of SS-25 by  
11 Relief Well 1.

12 On February 18, 2016, DOGGR certified that Well SS-25 was permanently sealed.

13 **VI. CONCLUSION.**

14 The SS-25 leak required a coordinated and careful response to safely kill the leaking  
15 well. SoCalGas dedicated senior leadership and resources at the site and responded reasonably  
16 and prudently to this event. SoCalGas worked as quickly as possible to kill the well while  
17 maintaining safety, identified alternative options to kill the well, and ultimately killed the well  
18 without ignition or significant injuries. Because of the multiple complexities involved in the  
19 well kill operations—the need to safely clear the hydrate, the inability to understand complexities  
20 of a leak occurring below the surface, the significant safety risk associated with weather, ground  
21 instability, and other conditions, and the ultimate need to drill a relief well—the well control  
22 operations reasonably took 111 days to be completed safely and successfully. Throughout the  
23 incident, based on the information known to it at the time, SoCalGas reasonably and prudently  
24 endeavored to identify options to kill the well expeditiously, and ultimately killed the well within  
25 a reasonable time.

26

1 **WITNESS QUALIFICATIONS**

2 My name is Rodger R. Schwecke. My business address is 555 West Fifth Street, Los  
3 Angeles, California 90013-1011.

4 I am the Senior Vice President of Gas Operations and Construction for Southern  
5 California Gas Company and San Diego Gas & Electric. In that capacity, I am responsible for  
6 overseeing overall gas system operations and construction projects. I served as the incident  
7 operations commander leading efforts surrounding the Aliso Canyon SS-25 gas leak. My duties  
8 included overseeing the Aliso Canyon facility's compliance with all directives of DOGGR and  
9 CPUC.

10 From October 2017 to April 2019, I served as Senior Vice President of Gas Transmission  
11 and Storage. In that role, I was responsible for overseeing transmission and storage operations.

12 Prior to that, from March 2017 to October 2017, I served as Senior Vice President of Gas  
13 Transmission, Storage, and System Operations. In that role, I was responsible for overseeing  
14 transmission and storage and overall system operations.

15 From 2012 to 2016, I served as Vice President of Customer Solutions. In that role, I  
16 oversaw major customer-related activities for SoCalGas, including account executives, customer  
17 communications and e-services. I was also responsible for customer programs promoting energy  
18 efficiency, sustainability, low-income assistance and the development of new emerging  
19 technologies, including clean transportation, distributed energy, in-home services and biofuels.

20 From 2010 through 2012, I was Director of Storage, managing underground storage field  
21 operations that support the daily and seasonal operational flexibility for the gas transmission and  
22 distribution system for SoCalGas. Prior to that position, I was Director of Energy Markets and  
23 Capacity Products from 2007 to 2010. In that role, I led the development, marketing, and  
24 capacity planning for products and services using existing pipeline and storage assets,  
25 developing regulatory cases involving those assets, and exploring expansion of the assets. Prior  
26 to 2007, I served in increasingly responsible management positions in business development,  
27 operations, marketing, engineering and project management for SoCalGas and Sempra Energy  
28 affiliates.

29 I graduated in 1983 from California State University, Long Beach, with a Bachelor of  
30 Science in Chemical Engineering.

1 I have previously testified before the California Public Utilities Commission, State of  
2 Maine Utilities Commission, and the North Carolina Utilities Commission.

3

**CHAPTER II**  
**PREPARED OPENING TESTIMONY OF RODGER SCHWECKE**  
**EXHIBIT 1**

Ranging Run	Phase	Relief Well Ranging Dep		Target Well Dept		Horizontal Plane Approximi				High Side to Target		Survey Shift		Note
		MD, ft	TVD, ft	MD, ft	TVD, ft	C-to-C Disance, ft	Uncertainty, ft	Azimuth, °	Uncertainty, °	Azimuth, °	Uncertainty, °	N, ft	E, ft	
1	Detection	3765.00	3330.86	3642.96	3643.10	19.0	+/- 10	314.0	+/- 15	-18.17	+/- 15	-3.55	34.39	
2	Follow	3848.00	3413.63	3725.80	3725.70	10.8	+/- 5	316.0	+/- 15	-50.70	+/- 15	-6.44	35.91	
3	Follow	3948.50	3514.00	3826.26	3826.10	10.4	+/- 3	298.8	+/- 15	298.80	+/- 15	4.96	34.97	
4	Follow	4100.00	3664.82	3977.69	3976.91	12.0	+/- 3	273.1	+/- 12	-165.90	+/- 15	-4.97	35.04	
5	Follow	4180.00	3744.36	4057.34	4056.45	13.0	+/- 3	267.0	+/- 15	177.90	+/- 15	-5.88	34.77	
6	Follow	4480.00	4043.40	4358.00	4355.49	9.8	+/- 3	211.8	+/- 15	130.20	+/- 15	-5.69	35.13	
7	Follow	4858.60	4421.10	4736.90	4733.19	14.9	+4 / -3	177.5	+/- 15	103.20	+/- 15	-6.42	36.47	
8	Follow	5367.00	4928.75	5244.78	5240.84	18.4	+/- 5	213.5	+/- 15	136.10	+/- 15	-5.90	34.81	
9	Follow	5881.00	5442.37	5758.41	5754.46	22.0	+/- 5	231.5	+/- 15	127.50	+/- 15	-5.79	34.85	
10	Follow	6592.00	6153.00	6469.50	6465.17	22.0	+/- 5	267.5	+/- 15	126.30	+/- 15	-5.79	34.85	
11	Follow	7077.00	6637.86	6954.30	6949.95	17.5	+8 / -4	280.7	+/- 15	79.20	+/- 15	-5.81	34.86	
12	Alignment	7598.00	7158.61	7475.30	7470.70	8.7	+4 / -2	294.5	+/- 15	NA	NA	-5.80	34.82	Near estimate
						<del>26.0</del>	<del>+/- 5</del>	<del>290.5</del>	<del>+/- 15</del>	NA	NA	<del>-3.01</del>	<del>34.26</del>	Far estimate
13	Alignment	7707.00	7267.55	8493.00	8481.04	5.1	+2 / -1	280.5	+/- 15	NA	NA	-5.71	34.78	Near estimate
						<del>23.4</del>	<del>+/- 5</del>	<del>287.2</del>	<del>+/- 15</del>	NA	NA	<del>-3.01</del>	<del>34.20</del>	Far estimate
14	Alignment	7797.00	7357.41	7674.20	7669.50	3.2	+/- 5	275.0	+/- 15	13.90	+/- 15	-5.50	34.44	
15	Alignment	7857.00	7417.39	7734.30	7729.48	2.4	+/- 0.4	247.9	+/- 15	-9.10	+/- 15	-5.68	34.72	
16	Alignment	7947.60	7507.98	7825.00	7820.07	4.8	+/- 1.0	212.0	+/- 15	-16.70	+/- 15	-0.15	7.61	Ran gyro in SS 25
17	Alignment	8067.00	7627.12	7944.30	7939.21	6.8	+/- 1.5	210.5	+/- 15	28.30	+/- 15	-1.11	7.32	
18	Alignment	8157.00	7716.20	8034.35	8028.29	4.8	+/- 1.0	196.5	+/- 15	22.30	+/- 15	-1.27	7.46	
19	Alignment	8237.00	7795.51	8114.40	8107.60	5.2	+/- 1.0	168.0	+/- 15	-12.50	+/- 15	-1.20	7.52	
20	Alignment	8337.00	7894.14	8214.30	8206.23	5.1	+/- 1.0	142.5	+/- 12	-28.80	+/- 12	-1.28	7.92	
21	Alignment	8400.00	7956.17	8277.10	8268.26	4.2	+/- 0.8	152.0	+/- 12	-5.90	+/- 12	-1.34	7.99	
22	Alignment	8447.80	8003.27	8326.50	8315.27	4.2	+/- 0.8	156.3	+/- 12	-12.10	+/- 12	-1.49	8.14	
23	Alignment	8499.20	8053.60	8376.50	8366.38	2.7	+/- 0.5	152.6	+/- 10	-10.60	+/- 10	-1.51	8.21	2.0' Projected E-to-E Distance
24	Alignment	8529.20	8083.10	8406.50	8395.89	2.5	+/- 0.5	157.0	+/- 10	-4.00	+/- 10	-1.56	8.13	1.8' Projected E-to-E Distance
25	Alignment	8559.20	8112.58	8436.50	8424.58	1.90	+/- 0.3	166.0	+/- 10	7.10	+/- 10	-1.33	8.18	1.2' Projected E-to-E Distance
26	Alignment	8584.20	8137.13	8461.50	8449.92	1.65	+/- 0.25	162.5	+/- 10	-3.70	+/- 10	-1.37	8.16	11.8" Projected E-to-E Distance
27	Alignment	8599.20	8151.83	8476.50	8464.62	1.20	+/- 0.20	161.5	+/- 10	-1.20	+/- 10	-1.30	8.13	6.5" Projected E-to-E Distance
28	Alignment	8610.00	8162.41	8486.50	8474.41	0.85	+/- 0.10	158.5	+/- 10	-5.60	+/- 10	-1.28	8.10	2.8" Projected E-to-E Distance
29	Final Alignment	8615.20	8167.50	8492.50	8479.50	0.65	+/- 0.05	155.0	+/- 10	-8.50	+/- 10	-1.26	8.11	Final Alignment

Exhibit 1