

**SoCalGas-54**

**Deposition Transcript of Margaret C. Felts (Feb. 24-25, 2021)**

**I.19-06-016**

**ALJs: Hecht/Poirier**

**Date Served: March 15, 2021**

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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). )  
-----)

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
MARGARET C. FELTS  
Wednesday, February 24, 2021  
Volume II

Reported by:  
CARLA SOARES  
CSR No. 5908  
Job No. 4475236  
Pages 327 - 547

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Release of Natural Gas from Its )  
Aliso Canyon Storage Facility. )  
(U904G). )  
----- )

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
MARGARET C. FELTS, Volume II, taken on behalf of  
Southern California Gas Company, beginning at  
10:02 a.m., and ending at 5:35 p.m., on Wednesday,  
February 24, 2021, before CARLA SOARES, Certified  
Shorthand Reporter No. 5908.

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APPEARANCES VIA VIDEOCONFERENCE:

For Southern California Gas Company:

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ALSO PRESENT: Sabina Clorfeine,  
Assistant General Counsel.  
Southern California Gas Company  
Carrie Rapaport, Video Operator

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WITNESS

MARGARET C. FELTS

EXAMINATION

Volume II

BY MR. STODDARD

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REFERENCED EXHIBITS

EXHIBIT PAGE

(None)

INSTRUCTIONS NOT TO ANSWER

PAGE LINE

(None)

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Witness Location: Delta, Colorado

Wednesday, February 24, 2021

10:02 a.m.

P R O C E E D I N G S

THE VIDEO OPERATOR: Good morning. We are on the record at 10:02 a.m. This is Wednesday, February 24th, year 2021.

Please note that microphones are sensitive and may pick up whispering, private conversations, and cellular interference. Please turn off all cell phones as they may interfere with deposition audio. Our audio- and video-recording will continue to take place unless all parties agree to go off the record.

10:02:53

This is Media 1 of the video-recorded deposition of Margaret C. Felts, taken by counsel for Southern California Gas Company, in the matter of the California Public Utilities Investigation No. 19-06-016.

10:03:13

This deposition is being held via Veritext remote videoconferencing. My name is Carrie Rapaport. I'm the videographer on behalf of Veritext. The court reporter is Carla Soares from Veritext.

10:03:35

I am not related to any party in this

10:03:51

1 action, nor am I financially interested in the 10:03:53  
2 outcome.

3 Counsel and all present in the room and  
4 everyone attending remotely will now state their  
5 appearances and affiliations for the record. If 10:04:03  
6 there are any objections to proceeding, please state  
7 them at the time of your appearance, beginning with  
8 the noticing attorney.

9 MR. STODDARD: Thank you.

10 My name is Jack Stoddard, I'm with Morgan 10:04:21  
11 Lewis, appearing on behalf of Southern California  
12 Gas Company.

13 MR. GRUEN: My name is -- I'm sorry. Go  
14 ahead.

15 MR. MOSHFEGH: Sorry, Darryl. My name is 10:04:36  
16 Pejman Moshfegh, also with Morgan, Lewis & Bockius,  
17 appearing on behalf of Southern California Gas  
18 Company.

19 MR. GRUEN: My name is Darryl Gruen, and  
20 I'm counsel appearing for the Safety and Enforcement 10:04:54  
21 Division of the California Public Utilities  
22 Commission.

23 THE REPORTER: There's an issue still with  
24 Mr. Gruen's sound.

25 THE VIDEO OPERATOR: There is indeed. 10:05:08

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1 MR. PEARL: Darryl, can you do me a favor? 10:05:19  
2 Go down to the bottom left corner of the Zoom  
3 screen, and there's a caret to the right of the  
4 "mute" button. If you click on that, "Audio  
5 Options" at the bottom of the menu there, do you see 10:05:28  
6 that?  
7 MR. GRUEN: Yes.  
8 MR. PEARL: Click on that, and in the  
9 middle of that screen it says "Microphone." There's  
10 a box that says "Automatically adjust volume." 10:05:36  
11 Do you see that?  
12 MR. GRUEN: Yes.  
13 MR. PEARL: Is that checked?  
14 MR. GRUEN: It is.  
15 MR. PEARL: Can you uncheck it, please, 10:05:43  
16 and then slide the volume all the way to the right?  
17 MR. GRUEN: Is this any better?  
18 MR. PEARL: Much better. Thank you.  
19 MR. GRUEN: Thank you very much. Shall I  
20 restate my appearance? 10:05:57  
21 THE VIDEO OPERATOR: Please do.  
22 MR. GRUEN: My name is Darryl Gruen. I'm  
23 counsel for the California Public Utilities  
24 Commission's Safety and Enforcement Division.  
25 MS. PURCHIA: My name is Robyn Purchia. I 10:06:14

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1 am counsel for the California Public Utilities 10:06:16  
2 Commission Safety and Enforcement Division.

3 THE VIDEO OPERATOR: Will the court  
4 reporter please swear in the witness.

5 MARGARET C. FELTS, 10:06:29  
6 having been administered an oath, was examined and  
7 testified as follows:

8 THE VIDEO OPERATOR: Thank you. You may  
9 proceed.

10 MR. STODDARD: Thank you. 10:06:45

11 EXAMINATION

12 BY MR. STODDARD:

13 Q Good morning, Ms. Felts. Initially before  
14 we get into the deposition, I'm going to make a few  
15 statements and admonitions for the record, and I'm 10:06:54  
16 going to give an opportunity for your counsel -- or  
17 for SED's counsel to do so as well.

18 Initially, this is a remote deposition,  
19 and I'd like to make clear the expectations of  
20 communications with the witness during the 10:07:07  
21 deposition.

22 During the proceeding, counsel and the  
23 witness will have an opportunity to speak off the  
24 record, you know, in breakout format same as you  
25 would if this were a live deposition. In the 10:07:21

1 virtual setting, however, the expectation is that 10:07:26  
2 counsel will not be communicating with the witness  
3 during the deposition while I'm on the record or  
4 while you're on the record answering questions.

5 And there will be no communications 10:07:37  
6 between counsel and the witness via text message,  
7 e-mail, or other electronic means or vice versa.

8 Those exchanges can be viewed as taking place in my  
9 presence and may not be subject to the protections  
10 of attorney-client privilege, sort of like passing a 10:07:51  
11 note in front of me should we all be in the same  
12 room.

13 It's also my understanding that you are  
14 not present with anybody else in the room right now  
15 where you are. If there's anybody in the room now 10:08:03  
16 or if anybody enters the room that you're in,  
17 Ms. Felts, during the deposition, please identify  
18 them so that we can get them on the record.

19 Do you understand?

20 A Yes. 10:08:19

21 Q And is anybody present in the room with  
22 you right now?

23 A No.

24 MR. STODDARD: Thank you.

25 Darryl, would you -- Mr. Gruen, would you 10:08:30

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1 like to make a statement for SED on the record? 10:08:32

2 MR. GRUEN: Thank you, Mr. Stoddard.

3 SED stipulates to the terms. We're not

4 planning to do communications while the --

5 MR. STODDARD: I'm sorry. I'm having 10:08:46

6 trouble hearing you. This may just be me this time.

7 I'm not sure.

8 I'm having trouble hearing Darryl again.

9 MR. GRUEN: Can you hear me now?

10 THE VIDEO OPERATOR: If you could speak 10:08:57

11 up, please, that would be a big help.

12 MR. STODDARD: You're whispering.

13 MR. GRUEN: I'll certainly try. I'm not

14 whispering, but I'll certainly do my best. Is this

15 any better? 10:09:07

16 THE VIDEO OPERATOR: It may be. Keep

17 going. We'll let you know.

18 MR. GRUEN: I will do that. Thank you.

19 Jack, Mr. Stoddard, the Safety and

20 Enforcement Division stipulates to the terms you 10:09:20

21 outlined.

22 It's not -- it's not our intent to

23 communicate with Ms. Felts while questions are being

24 asked during the deposition or to receive

25 communications from Ms. Felts while questions are 10:09:39

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1 being asked of her during the deposition. 10:09:43

2 A couple of other points. Safety and  
3 Enforcement Division's understanding of the scope of  
4 this deposition is that it is limited to questions  
5 related to Ms. Felts' reply, sur-reply, and 10:09:57

6 supplemental Violation 331 testimony in Commission  
7 Proceeding Investigation 19-06-06 -- -016. Excuse  
8 me. 19-06-016.

9 Safety and Enforcement Division  
10 understands that Southern California Gas Company has 10:10:24  
11 agreed with Safety and Enforcement Division to table  
12 the matter of deposing Safety and Enforcement  
13 Division's person most knowledgeable related to  
14 Violations 93 through 326 in this proceeding until a  
15 mutually agreeable date to be determined by Safety 10:10:43  
16 and Enforcement Division and Southern California Gas  
17 Company after upcoming hearings.

18 Safety and Enforcement Division reserves  
19 the right to offer Ms. Felts as the person most  
20 knowledgeable related to Violations 93 through 326 10:11:01  
21 in compliance with the administrative law judge's  
22 ruling from June 10th, 2021 [sic], at a later date.

23 Ms. Felts and Safety and Enforcement  
24 Division have not received any exhibits that  
25 SoCalGas -- I'll use "SoCalGas" in lieu of Southern 10:11:23

1 California Gas Company if that is acceptable and if 10:11:26  
2 there are no objections.

3 We have not received any exhibits SoCalGas  
4 intends to use ahead of time. Therefore, Ms. Felts  
5 and SED or Safety and Enforcement Division's counsel 10:11:39  
6 may require time to review an exhibit before she can  
7 answer questions related to it.

8 Thank you, Mr. Stoddard. I'll pass it  
9 back to you.

10 MR. STODDARD: Thank you, Mr. Gruen. 10:11:59

11 One additional admonition and response to  
12 SED's statements. SoCalGas understands SED's  
13 admonition, which was discussed in advance.

14 In addition, SoCalGas would like to state  
15 that it does not agree that Ms. Felts is the PMK on 10:12:18  
16 violations related to failure to cooperate. We  
17 understand SED has made a reservation on that topic,  
18 but we are not stipulating to that and we're not  
19 making any agreement on that issue as to this  
20 deposition or any future deposition. 10:12:36

21 Q Okay. Ms. Felts, when we last spoke at a  
22 deposition in February of last year, I asked you  
23 whether you had ever been in a deposition before,  
24 and you indicated you had, and I believe you  
25 approximated the number at less than ten. 10:13:04

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1 Does that sound correct? 10:13:07

2 A Yes.

3 Q Since February of 2020, have there been  
4 any additional depositions that you've sat for?

5 A No. 10:13:16

6 Q Okay. Again, we covered the rules of the  
7 road last time, but we are going to -- I'm going to  
8 walk through them again briefly here just to make  
9 sure we all have a mutual understanding about how  
10 the deposition will proceed before we get into 10:13:30  
11 substantive questions.

12 Ms. Felts, it's important when I ask  
13 questions today that you speak clearly and slowly  
14 for the court reporter.

15 Do you understand? 10:13:43

16 A Yes.

17 Q The court reporter can't capture nods or  
18 gestures, so make sure that you answer with words,  
19 "yes" or "no" or otherwise.

20 Do you understand? 10:13:53

21 A Yes.

22 Q Also, if you can please wait until I've  
23 asked a question before you answer it, please do so.  
24 I will also wait to ask a question -- any follow-up  
25 questions until you've finished answering a 10:14:07

1 question. Don't interrupt me, and I won't interrupt 10:14:10  
2 you.

3 Do you understand?

4 A Yes.

5 Q Thank you. 10:14:15

6 Also importantly today, I'm not asking you  
7 to guess or speculate as to any information. If you  
8 don't know the answer to a question, it's okay and  
9 you can simply say so.

10 Do you understand? 10:14:29

11 A Yes.

12 Q Ms. Felts, are you represented here by  
13 counsel today?

14 A Yes.

15 Q Can you please identify your counsel? 10:14:39

16 A Darryl Gruen and Robyn Purchia.

17 Q Thank you very much.

18 You understand that your attorney may  
19 state objections on the record, but that you should  
20 still answer the question unless you're directed not 10:14:52  
21 to do so?

22 A Yes.

23 Q Is there any reason why you are not able  
24 to provide anything other than your full and  
25 truthful testimony today? 10:15:05

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1 THE VIDEO OPERATOR: There we go. It 10:16:48  
2 should be fixed. Apologies.  
3 BY MR. STODDARD:  
4 Q Ms. Felts, are you able to see the exhibit  
5 marked as 2-01 on the screen? 10:17:12  
6 A Yes, I see it.  
7 Is there an option to make it any bigger?  
8 Q That's a good question.  
9 A I see it at the bottom of the screen.  
10 Okay. Now I can see it better. 10:17:28  
11 THE REPORTER: Excuse me. One second.  
12 This is Carla.  
13 Mr. Gruen, I see you're speaking, but  
14 you're on mute.  
15 MR. GRUEN: Can you hear me? 10:17:44  
16 THE REPORTER: Yes. I don't know what you  
17 said before.  
18 MR. GRUEN: Okay. Understood.  
19 With regards to the Exhibit Share option,  
20 I didn't notice any documents pop up under the 10:17:52  
21 Exhibit Share. Is that -- should we look for it  
22 there as well?  
23 MR. MOSHFEGH: The document should now  
24 appear in the "Marked Exhibits" folder, Darryl.  
25 Mr. Gruen, rather. 10:18:14

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1 MR. GRUEN: Okay. Bear with me a moment. 10:18:15

2 THE REPORTER: Mr. Gruen, you'll need to

3 hit "Refresh" every time a new exhibit is introduced

4 in order to access it.

5 MR. GRUEN: Okay. I had Exhibit -- bear 10:18:31

6 with me a moment. The Zoom exhibit took up my whole

7 screen. And so I had Exhibit Share on part of my

8 screen, but now I've lost the ability to access it.

9 Pardon me. This may just be my new -- since this is

10 my first experience with Exhibit Share, I'm still 10:18:49

11 struggling with how to access it. So pardon me.

12 MR. STODDARD: No problem at all. We want

13 to make sure that everybody is able to participate

14 today. So if there's any technological issues,

15 please, you know, don't be shy about saying so so we 10:19:02

16 can make sure everybody is able to participate.

17 MR. GRUEN: Thank you. Okay. I see. I

18 just was able to exit full screen from the Zoom, and

19 now I see Exhibit Share on part of my screen.

20 And I'm clicking on the "Marked" -- okay. 10:19:21

21 Here it is. I've refreshed the "Marked Exhibits"

22 folder, to your point, to the videographer's point,

23 and I'm opening Exhibit 2 now under the screen

24 share. Very good. I have access to it now. Thank

25 you. 10:19:41

1 BY MR. STODDARD: 10:19:44

2 Q And Ms. Felts, are you able to -- just to

3 make sure that this is working for you, are you also

4 able to access --

5 A Yes. 10:19:51

6 Q -- Exhibit Share?

7 A I have it open.

8 Q Okay. So you're able to manipulate the

9 document independently of Mr. Moshfegh's screen

10 share? 10:20:03

11 A Yes.

12 Q Take a moment to review the document,

13 please.

14 THE VIDEO OPERATOR: And Mr. Moshfegh, are

15 you all right with the ratio that is currently on 10:20:14

16 the screen? It's 60 percent document, 40 percent

17 witness.

18 MR. STODDARD: Yes, that's perfect. Thank

19 you.

20 THE VIDEO OPERATOR: Thank you. 10:20:27

21 MR. STODDARD: And just for purposes of

22 the record, it was Mr. Stoddard answering the

23 question.

24 THE VIDEO OPERATOR: Thank you.

25 /// 10:20:36

1 BY MR. STODDARD: 10:20:38

2 Q Ms. Felts, this is a -- this is our notice  
3 of deposition for your appearance today; is that  
4 correct?

5 A Yes. 10:20:45

6 Q Yes. And you understand that you're  
7 appearing in response to this notice of deposition?

8 A Yes.

9 MR. STODDARD: I'd like to note for  
10 purposes of the record that there are some documents 10:21:00  
11 that remain outstanding that may be relevant to this  
12 deposition that were requested in SoCalGas Data  
13 Request No. 11. Some of those documents may have  
14 been marked as "Confidential," and SED requested  
15 clarification from the administrative law judges 10:21:22  
16 regarding service and treatment of those exhibits.  
17 A ruling on that issue remains outstanding.

18 To the degree that those exhibits --  
19 sorry. To the degree those documents are  
20 potentially relevant to Ms. Felts' testimony here 10:21:41  
21 today or her reply testimony or her sur-reply  
22 testimony, we reserve the right to conduct further  
23 examination after receiving those documents.

24 Q Ms. Felts, what have you done to prepare  
25 for today's deposition? 10:21:59

1 A Virtually nothing. 10:22:03

2 Q Did you meet with counsel?

3 A We had a telephone call just about the

4 logistics of calling in.

5 Q Okay. Did you review any documents? 10:22:13

6 A No.

7 Q Did you communicate with anyone else at

8 SED --

9 A No.

10 Q -- other than counsel? 10:22:27

11 A No.

12 Q Did you communicate with anybody else at

13 all about today's deposition?

14 A No.

15 Q Thank you. 10:22:35

16 Ms. Felts, what's your understanding of

17 your role in this proceeding?

18 A I'm the expert witness.

19 Q You're the expert witness for SED?

20 A Yes. 10:22:46

21 Q What does that role entail?

22 A Well, the usual for an expert witness. I

23 meet with counsel, understand the issues, review

24 data, and form opinions, assist counsel in

25 understanding technical documents. Sometimes I help 10:23:11

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1 them with developing discovery if it involves 10:23:15

2 technical issues.

3 Q Are you assisting SED with its  
4 investigation of the Aliso Canyon incident that  
5 occurred on October 23rd, 2015? 10:23:31

6 A I'm assisting them in this particular  
7 case. I think there's three or more Aliso Canyon  
8 cases going on. So the one having to do with the  
9 release of gas from a well and the failed attempts  
10 to kill the well. 10:23:50

11 Q So you're assisting them with the  
12 investigation and enforcement action related to  
13 whether there were violations of law related to the  
14 incident?

15 A Yes. Good summary. 10:24:08

16 Q Thank you.

17 I'm going to ask about a few different  
18 activities, and you can tell me whether you agree  
19 that these are within your role.

20 As SED's expert witness, does your role 10:24:22  
21 include preparation of testimony?

22 A Yes.

23 Q Preparation of data responses?

24 A Yes.

25 Q And just to clarify, that's preparation of 10:24:35

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1 data responses on behalf of SED? 10:24:37

2 A Well, I prepare data responses that are

3 directed towards something that I would know.

4 There's other data -- data requests that I really

5 just didn't have anything to do with. 10:24:57

6 Q So you prepare data responses on behalf of

7 SED but not every data response on behalf of SED?

8 A Yes.

9 Q Okay. And then data requests that SED

10 issues to SoCalGas or other parties, do you draft 10:25:14

11 data requests?

12 A Say that again.

13 Q Do you prepare -- does your role include

14 preparation of data requests issued by SED to

15 SoCalGas? 10:25:34

16 A Yes, some of them.

17 Q And does your role include reviewing

18 production of documents by SoCalGas to SED?

19 A My role includes production of documents

20 in response to data requests if they are documents 10:26:04

21 that I have.

22 Q If they're documents that you have in your

23 possession?

24 A Yes.

25 Q Sorry. Two different questions. 10:26:12

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1 research or collection of documents that may be 10:27:38

2 responsive to the request?

3 A No. I've never been asked to do that, and  
4 I've never done it.

5 Q Okay. As we discussed, this is an 10:27:51

6 enforcement proceeding relating to potential  
7 violations of law.

8 Would you agree that SED should thoroughly  
9 investigate a matter before it alleges violations of  
10 law? 10:28:08

11 MR. GRUEN: Objection noting overbreadth  
12 to the question.

13 The witness can answer if she's able.

14 THE WITNESS: I think that's a legal  
15 question. 10:28:20

16 BY MR. STODDARD:

17 Q I'm just asking your opinion, Ms. Felts.

18 You've alleged violations in your  
19 testimony, have you not?

20 MR. GRUEN: I'll note this is a question 10:28:30

21 that's asking for a legal -- legal conclusion as  
22 well.

23 But the witness can answer if she's able  
24 to.

25 THE WITNESS: Yes. My opening testimony 10:28:39

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1 included the violations. 10:28:41

2 BY MR. STODDARD:

3 Q And your reply testimony includes

4 statements about how violations should stand; do you

5 agree? 10:28:54

6 A Yes.

7 MR. GRUEN: Same objection noting.

8 Go ahead.

9 BY MR. STODDARD:

10 Q And you allege the violations on behalf of 10:29:03

11 SED as its witness, correct?

12 MR. GRUEN: Noting objection of calling

13 for a legal conclusion for the record.

14 Go ahead.

15 THE WITNESS: Well, to the extent that my 10:29:16

16 reply testimony addresses violations, in my position

17 as an expert witness, I suppose I have to make

18 statements in my testimony that support those

19 violations. I think that's part of what my

20 testimony is all about. 10:29:46

21 BY MR. STODDARD:

22 Q Okay. So again, would you agree that

23 prior to alleging violations, it's important to

24 thoroughly investigate the factual basis for those

25 violations? 10:30:03

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1           A    In this -- well, in a normal situation, I           10:30:07  
2           would say yes.  In this particular case, the  
3           violations rest on the testimony or reports of that  
4           investigation by Blade, and so I rely on Blade's  
5           conclusions for the violations, most of the           10:30:28  
6           violations.

7           Q    So in terms of -- and to the degree that  
8           you're relying on Blade's opinions, you then don't  
9           believe it's important to thoroughly investigate the  
10          basis of those opinions for purposes of alleging       10:30:53  
11          violations?

12          A    I don't think it would be possible for me  
13          to essentially redo all of the work that Blade did  
14          under my agreement with the PUC, nor would there be  
15          time or capability to do that.                           10:31:12

16                It's something that happened in the past  
17          in a time frame and with conditions, for instance,  
18          in the field that I would not be able to recreate.

19                So I am relying on Blade's opinions.

20          Q    Did any of Blade's opinions include           10:31:34  
21          alleged violations of law?

22                MR. GRUEN:  I'll just note an objection  
23          for the record.  It's asking the witness to  
24          speculate about Blade.  She already indicated that  
25          she hasn't reviewed all of Blade's information.       10:31:51



1 again, relies on Public Utilities Code 451, is it 10:33:47  
2 your understanding of what your testimony states  
3 that SoCalGas acted unreasonably with respect to  
4 conduct on which you're alleging violations?

5 MR. GRUEN: I'll just note an objection. 10:34:04  
6 It calls for a legal conclusion.

7 The witness can answer if she's able.

8 THE WITNESS: At a very high level, my  
9 understanding is that the violations are safety  
10 violations and that the utility has a responsibility 10:34:18  
11 to the public and to its clients and customers to  
12 provide a safe service.

13 BY MR. STODDARD:

14 Q Can you describe what that responsibility  
15 is in your understanding? 10:34:43

16 A Again, at a very high level, to provide  
17 safe operations and service.

18 Q So in your view, anything which is unsafe  
19 is a violation of 451?

20 MR. GRUEN: Objection. Overbroad and 10:35:15  
21 vague.

22 The witness can answer if she's able to.

23 THE WITNESS: I think 451 is very broad in  
24 itself. That would cover all safety violations.

25 /// 10:35:34

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1 BY MR. STODDARD: 10:35:47

2 Q So if something goes wrong, Ms. Felts,

3 does that automatically constitute a 451 violation

4 if it results in an unsafe condition, in your view?

5 MR. GRUEN: Objection. Vague, overbroad. 10:35:55

6 She can answer.

7 THE WITNESS: Well, that's a very generic

8 and general question, and so my generic and general

9 answer is yes.

10 MR. STODDARD: Thank you. 10:36:14

11 BY MR. STODDARD:

12 Q So you indicated that you base your

13 violations primarily on the Blade report, and again,

14 Blade's opinions in its report.

15 Are there areas where you disagree with 10:36:35

16 Blade?

17 MR. GRUEN: Objection. Calls for

18 speculation. The witness has indicated she's not

19 familiar with all the terms of the Blade report.

20 To the extent she can answer, no -- 10:36:48

21 THE WITNESS: There was an area having to

22 do with the detection of leaks on SS-25 that I did

23 not agree with but have since come to understand

24 that Blade was stating that there was no history of

25 leaks in the area of the failure of SS-25. And I 10:37:14

1 was looking at documents that showed potential leaks 10:37:19  
2 at the bottom of the well.  
3 BY MR. STODDARD:  
4 Q Okay. So in that instance, you're not  
5 basing your testimony on the Blade report? 10:37:30  
6 A That's true. I was basing that on looking  
7 at data that had been provided in response to DRs.  
8 Q What sort of data?  
9 A It would have been well survey data, noise  
10 and temperature logs. 10:37:49  
11 Q And where did you get that data?  
12 A That was provided in response to data  
13 requests, probably from the well files.  
14 Q So by "data" here, you mean documents; is  
15 that correct? 10:38:14  
16 A To the extent that the data has been  
17 converted into a document, yes.  
18 Q Can you recall any data that was not  
19 converted into a document that you reviewed?  
20 A No. 10:38:35  
21 Q Have you examined any physical evidence?  
22 A You mean like a piece of pipe?  
23 Q Yes.  
24 A No.  
25 Q How about -- have you reviewed any 10:39:00

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1 electronic records in terms of in native format 10:39:03  
2 separate from document productions?  
3 MR. GRUEN: Objection. Vague. I think  
4 there's a clarification.  
5 Jack, haven't certain documents that have 10:39:18  
6 been provided in document production been provided  
7 in native format? Maybe just to parse that out.  
8 MR. STODDARD: Yeah. No, no. Let me  
9 restate.  
10 Q Ms. Felts, you indicated you haven't 10:39:31  
11 reviewed any physical evidence such as a piece of  
12 pipe; is that correct?  
13 A Yes.  
14 Q Have you visited the Aliso Canyon facility  
15 since your last deposition? 10:39:47  
16 A No.  
17 Q Have you inspected any hard copy physical  
18 versions of the well files since your last  
19 deposition?  
20 A No. 10:40:02  
21 Q Have you examined any of the evidence,  
22 physical -- the physical evidence that was collected  
23 by Blade, in the course of its root cause analysis  
24 investigation since your last deposition, to your  
25 knowledge? 10:40:23

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1 A No. 10:40:24

2 Q Thank you.

3 In preparing your testimonies -- actually,

4 let me strike that. Let me restate.

5 Over the past year since the last 10:40:36

6 deposition, you've submitted reply testimony,

7 sur-reply testimony, and supplemental testimony on

8 Violation 331; is that correct?

9 A Yes.

10 Q I'm going to ask about who you 10:40:55

11 communicated with in connection with preparation of

12 these testimonies.

13 Did you communicate with any SED personnel

14 in preparing these testimonies?

15 A No. 10:41:07

16 Q You communicated with Mr. Gruen?

17 A Yes.

18 Q Ms. Purchia?

19 A Yes.

20 Q Karen Shea? 10:41:18

21 MR. GRUEN: Objection. That's asked and

22 answered. Ms. Shea is SED personnel.

23 The witness can answer if she's able to.

24 THE WITNESS: The only thing I

25 communicated with Karen Shea about is my invoice one 10:41:34

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1 time. 10:41:42

2 BY MR. STODDARD:

3 Q And the invoice there would be a bill for  
4 your services?

5 A Yes. 10:41:49

6 MR. STODDARD: Okay. So then I'm going to  
7 confirm this, and if the answer is no to each, I'm  
8 not sure -- I think it's important to ask these  
9 questions because I don't know whether Ms. Felts'  
10 knowledge includes who's in SED and who isn't. 10:42:01

11 Q Have you communicated with Lee Palmer in  
12 connection with preparation of these testimonies?

13 MR. GRUEN: I'll just note an objection  
14 for the record. She can answer, but Lee Palmer is  
15 also SED personnel. So it's been asked and 10:42:17  
16 answered.

17 Go ahead.

18 THE WITNESS: No.

19 BY MR. STODDARD:

20 Q Randy Holter? 10:42:24

21 MR. GRUEN: Again, same objection as  
22 before. Randy Holter is SED personnel. Asked and  
23 answered.

24 She can answer.

25 THE WITNESS: No. 10:42:33

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1 BY MR. STODDARD: 10:42:33

2 Q Ms. Felts, are you aware of any

3 communications between your counsel and any of these

4 individuals related to preparation of your

5 testimonies? 10:42:43

6 A No.

7 Q Ms. Felts, for purposes of the next

8 questions, I'm going to -- communications includes

9 e-mail, text, live meeting, any form of

10 communication. 10:43:03

11 Do you understand?

12 A Yes.

13 Q Did you communicate with anybody from the

14 California Public Advocate's Office in connection

15 with preparation of your testimonies? 10:43:16

16 A No.

17 Q Did you communicate with anybody from

18 Blade Energy Partners since our last deposition?

19 A No.

20 Q Have you communicated with anybody in the 10:43:37

21 Los Angeles Department of Public Health since our

22 last deposition?

23 A No.

24 Q Are you aware of your counsel or others at

25 SED communicating with anybody from the Los Angeles 10:43:50

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1 Department of Public Health since our last 10:43:54  
2 deposition?

3 A No.

4 Q With regard to communications with your  
5 counsel related to preparation of your testimonies 10:44:07  
6 or data responses since the last deposition, did you  
7 communicate by e-mail, to the best of your  
8 recollection?

9 MR. GRUEN: I'll just note an objection.

10 Just for clarification, we're limiting 10:44:26  
11 this deposition to Ms. Felts' reply, sur-reply, and  
12 supplemental testimony which related to Violation  
13 331 for the purposes of this line of questioning.  
14 That's our understanding.

15 MR. STODDARD: We've asked data requests 10:44:42  
16 that relate to the subject matter of her testimony,  
17 both sur-reply and reply.

18 MR. GRUEN: Are you asking about her  
19 opening as well, Jack?

20 MR. STODDARD: I'm asking about data 10:44:55  
21 responses that have been issued since our last  
22 deposition, and reply and sur-reply testimony.

23 Q So any communications to the degree that  
24 you can recall, Ms. Felts -- let me restate the  
25 question. 10:45:13

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1 I'm going to run through some modes of 10:45:15  
2 communication here.

3 Did you communicate with your counsel by  
4 e-mail?

5 A Yes. 10:45:22

6 Q File transfer protocol?

7 A No.

8 Q Text messages?

9 A Yes.

10 Q Phone? 10:45:40

11 A Yes.

12 Q Videoconference?

13 A No.

14 Q Any website to which you had shared access  
15 such as Dropbox or Diamond Drive? 10:45:53

16 A Yes.

17 Q In the course of these communications, did  
18 you share drafts of testimonies?

19 A Yes.

20 Q Did you share drafts of data responses? 10:46:12

21 A Yes.

22 Q Did you share drafts of data requests?

23 A Yes.

24 Q Do you recall those drafts including  
25 redlines? 10:46:31

1 A Some of them might have. 10:46:36

2 Q Comments?

3 A Yes.

4 Q And were those drafts that -- strike that.

5 The drafts of testimonies that were 10:46:52

6 exchanged, were they exchanged via e-mail?

7 A Yes.

8 Q Were there also drafts that were shared

9 via a website such as Dropbox or Diamond Drive?

10 A No. 10:47:12

11 Q And were any drafts shared via text

12 message?

13 A No.

14 Q Ms. Felts, do you know what a percipient

15 witness is? 10:47:27

16 A You can explain that to me.

17 Q Sure.

18 Are you familiar with the concept of a

19 percipient witness which -- I think the standard

20 definition would be an eyewitness or a witness who 10:47:41

21 testifies about things that he or she directly saw

22 or perceived.

23 A Okay.

24 Q Are you familiar with that concept now

25 that I've restated the definition? 10:47:54

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1 THE WITNESS: I'm not sure what you mean 10:48:58  
2 by that.

3 BY MR. STODDARD:

4 Q I'll restate.

5 I asked whether percipient witness 10:49:04  
6 testimony, again, eyewitness testimony, can be  
7 valuable in contextualizing other types of evidence,  
8 and you indicated yes.

9 And I'm asking whether you would agree  
10 that it can be valuable in contextualizing physical 10:49:18  
11 evidence.

12 MR. GRUEN: I'll restate the objection for  
13 the record. Vague and overbroad.

14 She can answer.

15 THE WITNESS: I guess I'm not sure what 10:49:40  
16 you're asking there.

17 BY MR. STODDARD:

18 Q Ms. Felts, I asked whether you would agree  
19 that percipient witness testimony can be valuable in  
20 contextualizing other types of evidence, and you 10:49:52  
21 said yes. I will restate that question with the  
22 specific type of evidence just to confirm whether  
23 you agree.

24 Would you agree that percipient witness  
25 testimony can be valuable in contextualizing 10:50:06

1 physical evidence? 10:50:11

2 MR. GRUEN: I'll restate the objection for

3 the record. Vague and overbroad.

4 THE WITNESS: So my understanding is that

5 this instant question is a subset of the previous 10:50:19

6 question. And if it is, then yes.

7 BY MR. STODDARD:

8 Q And documentary evidence?

9 MR. GRUEN: Objection. Vague and

10 overbroad. 10:50:38

11 She can answer.

12 THE WITNESS: I will restate the previous

13 answer. If it's a subset, then yes.

14 BY MR. STODDARD:

15 Q Thank you. 10:50:48

16 In this case, you relied solely on

17 documentary evidence?

18 A Are you talking about to produce my

19 testimony I relied on documentary evidence? Is that

20 what you're asking me? 10:51:08

21 Q Yes. I'm asking you whether, in this

22 case, your testimony relies solely on documentary

23 evidence.

24 A Yes.

25 Q Is that consistent with what you've done 10:51:20

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1 in prior matters in which you've provided testimony 10:51:22  
2 as an expert witness?

3 A In most cases, yes. In all cases for the  
4 Public Utilities Commission, yes.

5 Q In the cases where you didn't solely rely 10:51:37  
6 on documentary evidence, do you recall what other  
7 sources of evidence you relied upon?

8 A Actually, let me back up a minute.  
9 There was one case for the Public  
10 Utilities Commission where I -- maybe there were 10:51:54  
11 actually two cases -- where I went on site visits  
12 and inspected physical evidence.

13 And so other cases would be environmental  
14 or oil-related, oil spill-related, where I went on  
15 site visits and inspected -- did primary inspections 10:52:17  
16 on-site.

17 Q And what sorts of cases were those?

18 A So not Public Utilities Commission cases,  
19 though some of them involved pipeline leaks; some of  
20 them involved underground storage tanks and leaks; 10:52:45  
21 some of them involved Phase 1 environmental  
22 assessments.

23 I don't know. There were so many, I  
24 couldn't --

25 Q So let's take a pipeline -- you indicated 10:53:11

1 some of them involved pipeline leak cases, but those 10:53:14  
2 were not Public Utilities Commission cases; is that  
3 correct?

4 A Yes.

5 Q What was the purpose of the site visit in 10:53:20  
6 those cases?

7 A Usually to determine the source of an oil  
8 that surfaced on the ground or was detected in a  
9 well. In one instance, it was gasoline.

10 Q And did you find those site visits or 10:53:44  
11 inspections informative in those cases?

12 A Yes. Actually, they were necessary.

13 MR. STODDARD: Thank you.

14 Darryl, before I move on, earlier

15 Ms. Felts indicated that there were drafts of 10:54:08

16 testimony that were exchanged. I know we're in

17 possession of some. I'm not sure we're in

18 possession of all. But for purposes of the record,

19 based on her testimony here today, we will review

20 and confirm, you know, that we have information 10:54:25

21 matching her description.

22 One item I do not believe we have is she

23 indicated that there were text messages with

24 counsel, and we do not have any text messages that

25 I'm aware of in our possession. 10:54:42

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1 THE WITNESS: So can I answer that? 10:54:47

2 MR. GRUEN: Yes.

3 THE WITNESS: Text messages have been  
4 primarily administrative and only occurred within  
5 about the last month. 10:54:55

6 BY MR. STODDARD:

7 Q So the text messages did not relate to  
8 testimony?

9 A That's correct.

10 Q And they didn't relate to the preparation 10:55:11  
11 of data responses?

12 A Right.

13 Q And those text messages, were they with  
14 Mr. Gruen?

15 A Yes. 10:55:23

16 Q Were there any text messages with  
17 Ms. Purchia?

18 A No.

19 Q Any text messages with anyone else for the  
20 Safety and Enforcement Division? 10:55:31

21 A No.

22 MR. GRUEN: Jack, just for the record,  
23 does that address your questions as to completeness  
24 of the response then related to testimony?

25 MR. STODDARD: Darryl, can you confirm 10:55:53

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1 that you have produced all drafts of testimony? 10:55:55

2 MR. GRUEN: We'll check offline. But to

3 the best of my knowledge, we -- we have. But I'll

4 double-check. We'll coordinate and just be sure

5 just out of an abundance of caution. 10:56:15

6 MR. STODDARD: Thank you. As I said at

7 the beginning of the deposition, to the degree that

8 there are drafts that have not been produced, we

9 reserve the right to conduct additional questioning

10 if necessary if additional drafts are produced. 10:56:32

11 Q Ms. Felts, moving on, in your -- in your

12 testimonies since our last deposition, you've

13 withdrawn certain violations; is that correct?

14 A Yes.

15 Q In particular, this includes Violations 80 10:56:58

16 to 82 related to failure to provide well kill

17 programs for Relief Well No. 2, SS-25A and SS-25B;

18 is that correct?

19 A Yes.

20 Q Do you recall the reason for the 10:57:18

21 withdrawal of that violation?

22 A Two reasons: One is that violation --

23 those violations were initially based on statements

24 or opinions/recommendations inside the Blade report

25 that I felt were not -- were more good practice 10:57:50

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1 recommendations, not statements of fact. 10:57:59

2 And then when I had an opportunity to  
3 review data provided by -- or documents provided by  
4 SoCalGas, I saw documents that would fall into that  
5 category, and so I felt like there was -- there was 10:58:19  
6 adequate planning in that respect having to do with  
7 the relief well and activities after January 2016.

8 So I recommended that those violations be  
9 deleted.

10 Q That was your recommendation to withdraw 10:58:50  
11 those violations?

12 A Yes.

13 Q That wasn't the direction of Mr. Gruen or  
14 anybody else with SED?

15 A No. It was just my recommendation. 10:59:02

16 Q Ms. Felts, you indicated that one of the  
17 reasons for withdrawing the violations is that they  
18 were initially based on statements or opinions  
19 inside the Blade report that you felt were more good  
20 practice recommendation and not statements of fact; 10:59:23  
21 is that correct?

22 MR. GRUEN: Objection. Misstates  
23 testimony and overly broad.

24 This question is focusing more generally  
25 on violations. The prior one in her answer was 10:59:35

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1 focusing on just relief well efforts and those 10:59:39  
2 specific violations.

3 MR. STODDARD: I did not understand the  
4 second part of your objection, Darryl.

5 MR. GRUEN: The answers that she gave with 10:59:52  
6 regards to --

7 MR. STODDARD: Maybe it would be easier  
8 just to have the court reporter read back -- we can  
9 have the court reporter read back the transcript.

10 MR. GRUEN: Well, let me -- if I can just 11:00:08  
11 restate the objection. Just bear with me a moment.

12 So my understanding of the answer that she  
13 gave was it was with regards to the relief well  
14 effort violations. But the question that followed  
15 was asking more generally about all violations. 11:00:24  
16 There's just a disconnect between the two lines of  
17 questions, if I understand.

18 MR. STODDARD: Let me restate the  
19 question.

20 MR. GRUEN: Okay. 11:00:40

21 MR. STODDARD: And before I do, maybe it  
22 would be easier if I could just ask the court  
23 reporter to read back lines 15 through up until the  
24 next question which begins at 41, 5.

25 THE REPORTER: Counsel, my page and lines 11:00:57

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1 may not be matching yours. So is this the -- do you 11:00:57  
2 want the witness's answer?

3 MR. STODDARD: Okay. Are you able to see  
4 the realtime, Ms. Felts?

5 THE WITNESS: No. 11:01:18

6 MR. STODDARD: No? Okay.  
7 The question that starts "Do you recall  
8 the reason for the withdrawal of that violation?"

9 THE REPORTER: Okay. One second.

10 MR. STODDARD: And then her answer to that 11:01:25  
11 question.

12 THE REPORTER: Give me one second to  
13 search for that.

14 (Record read as follows:  
15 Question: Do you recall the reason for 11:02:39  
16 the withdrawal of that violation?

17 "Answer: Two reasons: One is that  
18 violation -- those violations were initially  
19 based on statements or  
20 opinions/recommendations inside the Blade 11:02:39  
21 report that I felt were not -- were more good  
22 practice recommendations, not statements of  
23 fact. And then when I had an opportunity to  
24 review data provided by -- or documents  
25 provided by SoCalGas, I saw documents that 11:02:39

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1 would fall into that category, and so I felt 11:02:39  
2 like there was -- there was adequate planning  
3 in that respect having to do with the relief  
4 well and activities after January 2016. So I  
5 recommended that those violations be 11:02:39  
6 deleted.")

7 MR. STODDARD: Thank you.

8 Q Ms. Felts, where you stated -- when I  
9 asked you the question regarding why you withdrew  
10 those violations, that was in connection to 11:02:52  
11 Violations 80 to 82, which included failure to  
12 provide well kill programs for Relief Well No. 2,  
13 SS-25A and SS-25B, correct?

14 A Are you asking me if that's what you asked  
15 me? 11:03:14

16 Q I'm asking you to confirm that you were  
17 responding on those three items, which is failure to  
18 provide well kill programs for Relief Well No. 2,  
19 SS-25A and SS-25B.

20 A Yes. 11:03:27

21 Q And one of the reasons that you stated for  
22 withdrawing those violations is that they were  
23 initially based on statements or opinions,  
24 recommendations, inside the Blade report that you  
25 felt were more good practice recommendations, not 11:03:45

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1 statements of fact, correct? 11:03:48

2 A So this response that I gave you relates  
3 to the relief well.

4 Q So it doesn't apply to SS-25A or SS-25B?

5 A Well, there was a -- I mean, there is a 11:04:09  
6 violation that relates to those, and I didn't feel  
7 like that was appropriate under the conditions -- in  
8 the situation that there was with SS-25A and SS-25B.

9 In order to really answer your question,  
10 I'd have to go back and research my communications 11:04:33  
11 with Darryl to recover what my thinking was there.

12 Q So you recall -- you recall having  
13 communications with Darryl about withdrawal of those  
14 violations?

15 A Oh, yes. 11:04:52

16 Q And would those communications have been  
17 in e-mail?

18 A Possibly a phone call.

19 MR. STODDARD: Darryl, can you please  
20 confirm that we have all communications related to 11:05:03  
21 withdrawal of those violations?

22 MR. GRUEN: Yeah, we'll look into it.

23 BY MR. STODDARD:

24 Q Ms. Felts, focusing on the failure to  
25 provide well kill programs for the relief well, you 11:05:23

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1 indicated that that was -- that the reason for 11:05:29  
2 withdrawal was because it was a statement based on  
3 opinions or recommendations that were more good  
4 practice and not statements of fact; is that  
5 correct? 11:05:39

6 A That was my -- my thought at the time.

7 Q Can you explain what you mean by "more  
8 good practice rather than statements of fact"?

9 A I think it -- I think the idea is good.  
10 Everyone would like to have great planning ahead of 11:06:02  
11 time. But designing well kill plans that are  
12 specific to the wells prospectively might not be the  
13 best use of time. So --

14 Q And why is that?

15 A Well, you can't really -- you can't really 11:06:26  
16 forecast all possible problems that are going to  
17 arise. So you can have a -- you can have a well  
18 kill plan that says basically the things that are in  
19 some of the standards that SoCalGas already has.

20 But when you start trying to get your arms around 11:06:53  
21 every possibility of what could happen when you're  
22 trying to kill a well, I think you might run into a  
23 problem of never being able to cover all  
24 possibilities.

25 So I think falling back on the plans that 11:07:12

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1 are generally used is the best -- the best option. 11:07:19

2 Q So plans that are generally used would  
3 include plans like the routine well kill standard or  
4 the emergency well kill standard that SoCalGas had  
5 in place? 11:07:38

6 A Yes.

7 Q Ms. Felts, in terms of your point about it  
8 being more good practice rather than statements of  
9 fact in relation to maintaining a kill program for a  
10 relief well, would you agree that that's more kind 11:07:58  
11 of a forward-looking recommendation rather than  
12 something that was -- something that was done wrong  
13 that caused the incident?

14 A It's definitely not something that was  
15 done wrong, but -- this is just an engineering 11:08:20  
16 opinion on my part, I suppose -- but it would be  
17 nice -- and actually great -- to have these sorts of  
18 plans. But in my experience, they're usually a  
19 desktop exercise that doesn't necessarily provide  
20 any assistance in the field when you have an 11:08:54  
21 emergency.

22 Q So in a perfect world, it would be a nice  
23 idea, but in practice, it's probably not feasible?

24 A Yes.

25 Q Ms. Felts, you also recall withdrawing 11:09:03

1 Violation 88 in your sur-reply testimony and 11:09:12  
2 Reason 16 in your reply testimony to SoCalGas  
3 related to SoCalGas's alleged failure to disclose to  
4 DPH that natural gas contained crude oil.

5 A Yes. 11:09:34

6 Q And the reason for the withdrawal of those  
7 violations in your testimony was not specifically  
8 stated; is that correct?

9 A I don't recall right now whether we  
10 included -- 11:09:47

11 Q To the best of your recollection. We can  
12 look at the documents in a minute.

13 A Yes.

14 Q And it added a new Violation 331 instead;  
15 is that correct? 11:09:57

16 A Yes.

17 Q You also withdrew Violations 89 to 92  
18 related to the alleged data dump by SoCalGas on  
19 Blade Energy Partners; is that correct?

20 A Yes. 11:10:19

21 Q And you withdrew those violations after  
22 Blade stated in response to discovery that the  
23 document production had no impact on its  
24 conclusions; is that correct?

25 A Yes. 11:10:35

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1 Q These violations were withdrawn after you 11:10:39  
2 learned additional new information in the course of  
3 the proceeding; would you agree?

4 A Yes.

5 Q Could you have learned this information 11:10:53  
6 before you alleged the violations?

7 A No, because the violations were alleged in  
8 my opening testimony, and I didn't have access to  
9 documents until after that testimony was published.

10 Q I'm not sure I understand. 11:11:27

11 You -- let me take a step back.

12 You withdrew the violations based on  
13 information provided by Blade in response to a data  
14 request; is that correct?

15 A Yes. That data request was -- occurred 11:11:47  
16 well after the testimony was published.

17 Q But you believe that Blade's -- the impact  
18 on Blade was relevant to whether or not that should  
19 be a violation, correct?

20 A Specific to Violations 89 to 92, there had 11:12:05  
21 been, prior to me coming on the case, some  
22 conversation, apparently, with Blade, that may have  
23 been informal in which SED understood that the  
24 last-minute data dump, as they called it, caused  
25 some problems for Blade. 11:12:36

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1                   Later on we asked in a data request if                   11:12:38

2                   that was actually the case, and they responded no.

3                   Q    Who was involved in this informal  
4                   conversation, to your knowledge?

5                   A    I do not know.   11:12:51

6                   Q    Somebody from Blade?

7                   A    Somebody from Blade, and I'm assuming  
8                   probably counsel from the Public Utilities  
9                   Commission.

10                  Q    Who told you of this conversation?                   11:13:03

11                  A    Mr. Gruen.

12                  Q    And what did he tell you about it?

13                  A    Just what I just told you.  I really don't  
14                  know any more than that.

15                  Q    Okay.  So you didn't -- you withdrew this           11:13:19  
16                  violation after you learned new information that  
17                  contradicted what you'd previously understood?

18                  MR. GRUEN:  Objection.  Misstates  
19                  testimony.

20                  THE WITNESS:  Yes.                                       11:13:35

21                  BY MR. STODDARD:

22                  Q    And what you previously understood had  
23                  been told to you by SED; is that correct?

24                  A    Been told to me by Mr. Gruen.

25                  Q    Do you feel as though you were misled by           11:13:50

1 Mr. Gruen on this violation? 11:13:53

2 MR. GRUEN: Objection. Misstates

3 testimony.

4 THE WITNESS: No. I think it was just

5 a -- I think at the time that's what he understood 11:13:59

6 had happened.

7 BY MR. STODDARD:

8 Q So you've explained why you feel as though

9 you couldn't have known this prior to alleging a

10 violation. 11:14:16

11 Could SED have asked for further

12 information to the degree this was relevant prior to

13 asking you to allege this violation?

14 MR. GRUEN: Objection. Calls for

15 speculation. 11:14:26

16 THE WITNESS: I really -- I don't know. I

17 don't know the time frame of conversations. I just

18 don't have any additional information on that.

19 BY MR. STODDARD:

20 Q But again, your withdrawal was in response 11:14:42

21 to information provided by Blade in response to a

22 data request, correct?

23 A I think you already said that.

24 Q SED could have issued the same data

25 request earlier, couldn't they? 11:15:00

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1 MR. GRUEN: Objection. Calls for 11:15:03  
2 speculation.

3 THE WITNESS: I think theoretically I  
4 suppose they could have, but I'm not aware of what  
5 the timing was and whether or not they could have 11:15:14  
6 done that before testimony.

7 BY MR. STODDARD:

8 Q Ms. Felts, when you allege that violation  
9 in your opening testimony, do you recall what due  
10 diligence you did or what questions you asked to 11:15:32  
11 substantiate the basis for the violation?

12 A I'm sure I had a conversation with  
13 Mr. Gruen about it. I don't recall specifically  
14 what it was.

15 Q In contrast to Violations 89 to 92, which 11:16:00  
16 it sounds like were withdrawn after you reconsidered  
17 your position in response to new information, I'm  
18 going to turn to Violations 80 to 82 which, as I  
19 understand, you withdrew because you decided it was  
20 more of a -- you know, an idea that could work in 11:16:19  
21 practice but wasn't feasible in reality.

22 Ms. Felts, with regard to Violations 80 to  
23 82, would you agree that those violations were  
24 withdrawn based on your opinion regarding the  
25 feasibility of developing well kill programs in 11:16:43

1 advance? 11:16:48

2 A That was one reason. The other reason was

3 that when I reviewed documents, I found that

4 SoCalGas actually took steps to develop well kill

5 plans for the relief wells. 11:17:08

6 Q So there was new information obtained

7 after you initially alleged the violations that

8 impacted your opinion?

9 A Yes.

10 Q Do you recall specifically what documents 11:17:22

11 or data you're referring to?

12 A No, not offhand.

13 Q Do you recall whether that was information

14 that was provided after your opening testimony?

15 A Subject to check, I believe that those 11:17:50

16 were documents that were attached to or following

17 e-mails among thousands of e-mails provided in

18 response to DR 16.

19 Q So then it was information that was

20 already in the possession of SED at the time that 11:18:10

21 you submitted your opening testimony?

22 MR. GRUEN: Objection. Misstates

23 testimony, assumes facts.

24 BY MR. STODDARD:

25 Q Ms. Felts, isn't it correct that 11:18:20

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1 SoCalGas's response to SED 16 was provided in 11:18:24  
2 advance of your opening testimony?

3 MR. GRUEN: Objection. Misstates  
4 testimony, assumes facts not in evidence.

5 THE WITNESS: It was provided to SED. I 11:18:41  
6 do not know the dates, just sitting here, when it  
7 was provided. I assume it was before testimony was  
8 published.

9 This was a data set, like I said, of --  
10 actually, it's probably over 100,000 e-mails. I did 11:18:59  
11 not have access to them until months later.

12 BY MR. STODDARD:

13 Q Why didn't you have access to them until  
14 months later?

15 A Most of this data was on a PUC Diamond 11:19:15  
16 Drive. And they attempted to make it possible for  
17 me to access data on the Diamond Drive, but it  
18 didn't work out remotely. It was just really too  
19 time-consuming. I could spend up to five to ten  
20 minutes just trying to open one of those e-mails. 11:19:38

21 And so later we were able to get the --  
22 get the data moved to my computer where I could look  
23 at it.

24 Q And by "the data," you mean the data that  
25 was on Diamond Drive? 11:19:59

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1 A Yes. 11:20:00

2 Q Okay. Do you recall when that occurred?

3 A It's still occurring.

4 Q It's still occurring?

5 A Years. It's taken all year to get 11:20:13

6 documents.

7 Q So you still don't have access to Diamond

8 Drive directly when you're working remotely?

9 A I had it. I could probably get it again.

10 But I do not have it and have not had access for the 11:20:27

11 last few months.

12 Q Okay. So if there are records you need to

13 review, you need to ask for those records

14 specifically from SED?

15 A I ask Darryl to download them for me. 11:20:45

16 Q So at the time you submitted your reply

17 testimony, you still didn't have full access to the

18 records in SED's possession; is that correct?

19 A You're asking me if at the time of my

20 reply testimony, did I have all of the records or 11:21:08

21 access to all of them?

22 Q Yes.

23 A The answer is no. I'm still missing

24 records that were submitted.

25 Q And at the time of your sur-reply 11:21:22

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1 testimony, did you have full access to all the 11:21:26  
2 records in SED's possession?

3 A No.

4 Q And at the time of your supplemental  
5 testimony on Violation 331, did you have full access 11:21:35  
6 to the records in SED's possession?

7 A No. And I would qualify that that I --  
8 some of those records actually I'm not sure if SED  
9 had. Because when I tried to open some files, they  
10 said they were corrupted. 11:21:54

11 So it wasn't clear to me whether it was  
12 because of my remote access or whether the files are  
13 actually corrupted and were never obtained again.

14 Q When Darryl provides you files, are they  
15 provided to you in corrupted format? 11:22:13

16 A No.

17 MR. GRUEN: Objection. Vague and  
18 overbroad.

19 But she can answer.

20 THE WITNESS: No. No. 11:22:20

21 BY MR. STODDARD:

22 Q And again, just to confirm, at this time,  
23 you do not have direct access to Diamond; is that  
24 correct?

25 A That's correct. 11:22:30

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1 Q So aside from files that are provided to 11:22:34  
2 you by Mr. Gruen, is there any other way that you  
3 get records related to this proceeding?

4 A No.

5 Q So you only really know with respect to 11:22:51  
6 records what Mr. Gruen shares with you?

7 A That's an incorrect statement.

8 Q Please correct me.

9 A I have, over the last year, managed to --  
10 let's see, what's the word? -- transfer or obtain 11:23:14  
11 I'd say probably at least 95 percent of the  
12 responses from SoCalGas to my computer, so --  
13 actually to a hard drive here. So I have a hard  
14 drive that has most of them.

15 There are some sets of data that have been 11:23:38  
16 referenced in recent SoCalGas data responses that I  
17 do not have, and I don't think they're in the  
18 Diamond Drive, either.

19 Q Do you remember whether any of the  
20 documentary evidence that SoCalGas referenced in its 11:23:57  
21 testimony was information that you had not had  
22 access to prior to the submission of testimony?

23 Strike that. I can get to that later more  
24 specifically.

25 MR. GRUEN: The witness is entitled to 11:24:17

1 answer the question that's been asked. I'm going to 11:24:18  
2 insist she answer.  
3 BY MR. STODDARD:  
4 Q Go ahead.  
5 A Okay. So if there are documents missing 11:24:24  
6 now, they were missing -- they've been missing, as  
7 far as I know, all along. Nothing has been deleted  
8 on Diamond Drive.  
9 So if we haven't been able to identify a  
10 certain string of Bates numbers that's referenced by 11:24:42  
11 SoCalGas, then I have to assume that SED never  
12 received them.  
13 Q But again, you don't have access to  
14 Diamond Drive, do you, Ms. Felts?  
15 A No. I have to ask -- at this point, I 11:25:00  
16 have to ask Darryl to look on Diamond Drive to see  
17 if they're there.  
18 Q So you don't have a basis for making such  
19 an assumption, do you?  
20 MR. GRUEN: Objection. Overbroad, 11:25:10  
21 calls -- and vague.  
22 She can answer.  
23 THE WITNESS: For making the assumption  
24 that they weren't provided?  
25 /// 11:25:25

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1 BY MR. STODDARD: 11:25:25

2 Q Yeah.

3 A I really -- that's probably overstating  
4 the situation. I just don't know why they're not  
5 there. 11:25:36

6 Q Thank you.

7 Ms. Felts, would it be fair to say that  
8 you're still collecting information from SED that's  
9 relevant to the violations that SED has already  
10 asked you to allege? 11:25:54

11 MR. GRUEN: Objection. Misstates  
12 testimony.

13 THE WITNESS: I'm not aware of any type of  
14 information that I would be seeking to support any  
15 of the violations. 11:26:10

16 So I think my answer to your question is  
17 no.

18 BY MR. STODDARD:

19 Q Ms. Felts, has anyone at SED spoken with  
20 you about alleging additional violations against 11:26:27  
21 SoCalGas beyond those identified in your current  
22 testimonies?

23 MR. GRUEN: Object to the extent it calls  
24 for attorney-client privilege, but I -- Jack, I  
25 think we're okay here. But to the extent that it -- 11:26:41

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1 attorney-client privilege applies, I'm going to 11:26:48  
2 instruct her not to answer.  
3 Go ahead, Ms. Felts.  
4 THE WITNESS: You just instructed me not  
5 to answer, but -- 11:26:55  
6 MR. GRUEN: I think -- I think you can  
7 answer.  
8 THE WITNESS: I'm not aware of any more  
9 violations.  
10 BY MR. STODDARD: 11:27:07  
11 Q So just to restate the question since I  
12 believe that Darryl -- Mr. Gruen withdrew his  
13 privilege objection, has Mr. Gruen spoken with you  
14 about alleging additional violations against  
15 SoCalGas in addition to those identified? 11:27:20  
16 A No.  
17 Q Has anyone else from SED spoken to you  
18 about alleging additional violations against  
19 SoCalGas in addition to those identified in your  
20 testimony? 11:27:33  
21 A No.  
22 MR. STODDARD: Thank you.  
23 We've been going now for an hour and a  
24 half. I think it would be a good time to take a  
25 break if that's okay with you, Ms. Felts. 11:27:44

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1 THE WITNESS: Sure. 11:27:46

2 THE VIDEO OPERATOR: We are now going off

3 the record. The time is 11:27 a.m. This is the end

4 of Media 1.

5 (Recess, 11:27 a.m. - 11:46 a.m.) 11:27:55

6 THE VIDEO OPERATOR: We are now back on

7 the record. This is the start of Media 2. The time

8 is 11:46 a.m.

9 BY MR. STODDARD:

10 Q Ms. Felts, I want to circle back on a 11:46:31

11 couple of logistical issues just to confirm.

12 Are you working off of two monitors today?

13 Do you have two screens or do you have one screen?

14 A I have -- I have another computer, but its

15 screen saver is on. 11:46:48

16 Q Okay. So --

17 A I have two windows open on this computer.

18 One has that notice of deposition on it, and the

19 other is the camera.

20 Q Okay. Do you have anything else with you 11:47:03

21 today, whether -- you know, any kind of electronic

22 device?

23 A Yeah, I have a phone.

24 Q A phone? And would you mind putting your

25 phone aside for the deposition, you know, to the 11:47:16

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1 degree that you're able to? 11:47:21

2 A Well, yeah. It's off. It's muted.

3 Q It's off?

4 Are you referencing any documents in the

5 course of the deposition? 11:47:28

6 A Here's what I have. My notepad.

7 Q Okay. Thank you very much.

8 Circling back to what we were discussing

9 earlier regarding Violation 331 --

10 A Okay. 11:47:52

11 Q -- and withdrawal of Violation 88 --

12 A Okay.

13 Q -- Ms. Felts, as we discussed earlier, at

14 the time that you withdrew Violation 88 and Reason

15 16 in your reply testimony, both of which related to 11:48:10

16 the DPH-related issues, do you recall why you

17 withdrew those violations?

18 A From my perspective, I withdrew them

19 because there was sufficient documentation that

20 showed the data showing that there was crude oil in 11:48:33

21 the release, and release of gas was available to the

22 Department of Health Services.

23 And I believe I base that on -- if I'm

24 recalling correctly, I think I base that on actual

25 analysis of the emissions, possibly was data 11:49:11

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1 performed by their resources. I'm not sure. 11:49:25

2 But there was a set -- there is a set of

3 data, and it was primarily reporting a higher

4 lighter components: methane, ethane, that sort of

5 thing. 11:49:47

6 But on the same analysis, it reported that

7 there were also heavier constituents in it, and did

8 not identify them specifically, but it was enough

9 TPH to alert anybody who has a background in looking

10 at analytical data like that that there was 11:50:06

11 something heavier than just methane in the air.

12 So that was --

13 (Proceedings interrupted.)

14 THE WITNESS: I'm sorry. I thought I had

15 that turned off. 11:50:26

16 That was my trigger point. And then I

17 believe after that, there was some documentation

18 that was provided by SoCalGas that showed all of the

19 information that had been provided or made available

20 to DHS. 11:50:48

21 And so at that point, I thought it

22 couldn't have been a surprise to them.

23 BY MR. STODDARD:

24 Q Sorry. Are you done with your answer

25 there? 11:51:02



1 MR. GRUEN: Well, I'm going to restate the 11:52:23  
2 objection. She was asking -- it was asking about  
3 information, but this question is different. It's  
4 calling for speculation as to the awareness of DPH.

5 MR. STODDARD: I don't know if the court 11:52:35  
6 reporter can hear you, but I'm not hearing you. I  
7 can hear you partially, but you're kind of fading in  
8 and out.

9 MR. GRUEN: Sorry for that. I'm doing the  
10 best I can. 11:52:48

11 Can you hear me any better now?

12 MR. STODDARD: Yes.

13 MR. GRUEN: Okay. I'm just rereading the  
14 EclipseCat. It looks like I'm being captured  
15 correctly. 11:53:03

16 But Jack, I want to be sure that you can  
17 capture what I'm hearing, too, so I'm going to  
18 reread what I said.

19 I'm going to restate the objection. The  
20 new question was asking about information that was 11:53:13  
21 available to DPH in Ms. Felts' view. The second  
22 question was different. It was asking her to  
23 speculate about what DPH should have been aware  
24 about or was aware about.

25 She can answer to the best she's able if 11:53:40

1 she can. 11:53:43

2 THE WITNESS: Well, at this point, I think  
3 you'd have to restate the question.

4 BY MR. STODDARD:

5 Q I'm not going to restate the question. I 11:53:53  
6 believe what I asked was a question based on, you  
7 know, as I said, a summary of your lengthy answer,  
8 and you indicated that the answer was yes.

9 Mr. Gruen stated his objection, and I  
10 think we can proceed. 11:54:10

11 Was the decision to withdraw Violation 88  
12 and Reason 16 your decision or was it SED's  
13 decision?

14 A It was my recommendation.

15 Q Your recommendation to -- 11:54:29

16 A To Mr. Gruen.

17 Q -- Mr. Gruen.

18 And at the time you made that  
19 recommendation, did you also recommend alleging a  
20 new Violation 331? 11:54:40

21 A The 331 violation turned up later.

22 Q Can you explain when?

23 A I don't recall exactly, but I'd say there  
24 was probably more than a month in between the two.

25 Q And in terms of the reason you withdrew 88 11:55:14

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1 included your independent review of data that you 11:55:18  
2 indicated you had obtained from the Air Resources  
3 Board; am I recalling that correctly?

4 A It was data that was provided in response  
5 to one of the data requests. So SoCalGas had 11:55:31  
6 provided that data.

7 Q Thank you.

8 And can you explain more specifically what  
9 that data showed that you recall?

10 A It's an analysis that shows heavier 11:55:49  
11 hydrocarbons in the emissions from the well. And I  
12 don't remember the date of it. I just -- I can't  
13 tell you any details other than that.

14 Q So heavier hydrocarbons such as oil?

15 A Yes. 11:56:10

16 Q Do you recall anything else that that data  
17 showed?

18 A Well, I'm sure it's just a standard  
19 analysis for air emissions with methane.

20 Q Do you know whether that data was 11:56:39  
21 available to SED prior to your opening testimony?

22 A No, I don't.

23 Q Do you know whether that data was  
24 available to SED at the time of your opening  
25 testimony? 11:56:54

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1 BY MR. STODDARD: 11:58:51

2 Q That would be the new Violation 331;  
3 wouldn't that be correct?

4 A Yes.

5 Q For Violation 88, I'm referring to the 11:58:57  
6 ones related to the DPH issue that were withdrawn.

7 Can you briefly state your recollection of  
8 what Violation 88 concerned?

9 A Well, it's been a long time since I looked  
10 at that. But as I sit here today, I recall that 11:59:12  
11 that was a complaint that the commission or SED --  
12 I'm not sure which -- received from DPH, saying that  
13 they were not told that there was oil emitted with  
14 the emissions from SS-25.

15 Q And that violation was stated in your 11:59:39  
16 opening testimony.

17 My question is what you did to investigate  
18 the basis for that violation prior to submitting  
19 opening testimony.

20 MR. GRUEN: I object that this line of 11:59:55  
21 questioning is asking about something that's now  
22 moot. The violation has been withdrawn and it's not  
23 part of the proceeding.

24 But if you want to go down this line of  
25 questioning, she can answer. 12:00:05

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1 THE WITNESS: My understanding is that 12:00:11  
2 there was some communication that it was based on,  
3 and I believed at the time that there was that  
4 communication. The communication was that DPH said  
5 they were not alerted as to the oil in the release 12:00:25  
6 from SS-25.  
7 BY MR. STODDARD:  
8 Q And then based on your subsequent  
9 investigation, you determined that that -- that your  
10 initial understanding was not correct? 12:00:40  
11 A Yes.  
12 Q Thank you.  
13 Moving on to Violation 331, and this is  
14 the one I think you referred to a moment ago, can  
15 you please briefly describe your understanding of 12:00:56  
16 the violation you're alleging as Violation 331?  
17 A Okay. I just did that. So you can just  
18 read it -- read it back.  
19 Q Let's see. Here we go. I'll read it back  
20 for you since I'm right there, and you can tell me 12:01:37  
21 if this is -- this is correct.  
22 Your description of Violation 331 was,  
23 "Without seeing it actually stated, I'll tell you  
24 that I don't know if I'm comfortable summarizing it.  
25 It has to do with the release of oil and during -- I 12:01:51

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1 think it was a November 13 well kill." 12:01:55

2 Is that correct?

3 A Yes.

4 Q And as you sit here, that is your best

5 account for what Violation 331 entails? 12:02:02

6 A Yes.

7 MR. STODDARD: Pejman, let's introduce

8 Exhibit 2.

9 (Exhibit 2-02 was marked for

10 identification and is attached hereto.) 12:02:18

11 MR. STODDARD: This is Ms. Felts'

12 sur-reply testimony dated June 30th, 2020. It takes

13 a second to upload the documents, but they should be

14 available to you guys in a second.

15 MR. GRUEN: Thanks. Bear with us. I can 12:02:45

16 give indication when we have them.

17 And pardon my newness to the technology.

18 This is -- I see a PDF document uploaded, but

19 perhaps it's the first exhibit still. Do I need to

20 refresh the -- 12:03:09

21 MR. STODDARD: I think you need to refresh

22 it.

23 MR. GRUEN: Yeah. Okay.

24 THE WITNESS: How do you refresh it?

25 MR. STODDARD: You've exceeded my 12:03:20

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1 knowledge already. 12:03:21

2 THE WITNESS: So if the old one is still

3 there, then it hasn't come up.

4 Okay. Got it.

5 MR. GRUEN: Not me, unfortunately, just 12:04:07

6 yet. And I'm trying to click on a new folder. I

7 seem to be --

8 THE REPORTER: Click on "Marked Exhibits,"

9 not "New Folder."

10 MR. GRUEN: I'm trying. Oh, okay. I 12:04:26

11 think it may have come up. Bear with me. Yes, I

12 see it now. Okay. Thank you. I'm with you.

13 Robyn, do you -- do you have access to the

14 second exhibit as well?

15 MS. PURCHIA: I have clicked on it, and 12:04:47

16 it's downloading. That's my status.

17 MR. GRUEN: Okay. Maybe we could just --

18 if you could bear with us for a moment until we all

19 have access to it on our end.

20 And Margaret, I understood you have access 12:05:00

21 to the second exhibit; is that right?

22 THE WITNESS: Yes, I have it.

23 MR. GRUEN: Okay.

24 MS. PURCHIA: I have it now, too.

25 MR. GRUEN: Okay. We're all set on SED's 12:05:13

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1 end. Thank you for your patience. 12:05:15

2 MR. STODDARD: No problem. Thank you for

3 your patience.

4 So we are -- I'm able to see the screen

5 share. Just to confirm, can everybody else see the 12:05:23

6 document on the screen as well?

7 THE WITNESS: Yes.

8 MR. GRUEN: Yes.

9 BY MR. STODDARD:

10 Q All right, Ms. Felts. We were discussing 12:05:36

11 what the nature of Violation 331 was.

12 I'm going to direct you to the header

13 here. The header states, "Violation 331: SoCalGas

14 purposely extracted and vented oil into the

15 atmosphere during the SS-25 incident on November 13, 12:05:51

16 2015, which is a 451 violation because it exposed

17 people near the well and the public to hazardous

18 substances."

19 Do you see that?

20 A Can I look at this on the other screen 12:06:24

21 that I have where it's a little bit larger? Can you

22 tell me what page it is?

23 Q Sure. It's page 1 of the testimony, and

24 it is -- because this is -- let me see. One second.

25 A This doesn't -- 12:06:50

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1 Q It's page 129 of the PDF document. 12:06:51

2 A 129? Okay. I'm on that page. I've got

3 it.

4 Okay. And then what is the question?

5 Q I was just directing you to the header. 12:07:29

6 I'll just restate it.

7 Do you see where it says that SoCalGas

8 purposely extracted and vented oil into the

9 atmosphere during the SS-25 incident on

10 November 13th, 2015, which is a 451 violation 12:07:41

11 because it exposed people near the well and the

12 public to hazardous substances?

13 A Right. Okay. I see it.

14 Q So the violation as stated there is that

15 it's a 451 violation because of the exposure to the 12:08:02

16 public; is that -- the public and people near the

17 well to hazardous substances; is that correct?

18 A Yes, and that it was purposeful, which is

19 on the top line.

20 Q Okay. I'm now going to direct you to the 12:08:22

21 last page of this section, which is the concluding

22 sentence. I believe it's page -- I'm having trouble

23 seeing the bottom of the screen -- page 132 of 142

24 of the PDF.

25 A Okay. The "In conclusion" -- 12:08:47

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1 Q Correct. "In conclusion, records suggest 12:08:52  
2 that a purposeful release of oil and gas occurred  
3 and that SoCalGas subsequently attempted to cover up  
4 the facts surrounding this release in violation of  
5 451." 12:09:02

6 Do you see that?

7 A Yes.

8 Q Ms. Felts, would you agree that the  
9 violation is stated differently in these two places?

10 A Yes. 12:09:20

11 Q What is your understanding of the  
12 violation that is being alleged here?

13 A Along the -- for the violation?

14 Q What is your understanding of the  
15 violation that's being alleged in connection with 12:09:35  
16 Violation 331?

17 A The violation is, I believe, as stated in  
18 the header that we just read.

19 Q Okay. So to clarify, the violation is not  
20 related to the alleged cover-up of facts surrounding 12:09:53  
21 the release?

22 MR. GRUEN: Objection. Misstates  
23 testimony.

24 She can answer.

25 THE WITNESS: Well, my understanding is 12:10:03

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1 that the violation is as stated in the header. 12:10:07

2 BY MR. STODDARD:

3 Q Ms. Felts, then, if you can read the last  
4 sentence again, which states, "In conclusion,  
5 records suggest that a purposeful release of oil and 12:10:21  
6 gas occurred and that SoCalGas subsequently  
7 attempted to cover up facts surrounding this release  
8 in violation of 451."

9 Would you agree that that language  
10 suggests that that statement there regarding the 12:10:36  
11 cover-up is a violation of 451?

12 MR. GRUEN: Objection. Calls for a legal  
13 conclusion.

14 She can answer the question if she's able.

15 THE WITNESS: I think there's maybe a 12:11:06  
16 couple of ways that you could interpret the  
17 concluding sentence.

18 BY MR. STODDARD:

19 Q It's your testimony, Ms. Felts. How do  
20 you interpret it? 12:11:18

21 A I -- I would interpret it to read -- if  
22 you were to line out "subsequently attempted to  
23 cover up the facts," that you would still have a  
24 correct statement.

25 And so I guess my concern is that the 12:11:46

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1 structure of this sentence should be "surrounding 12:11:48  
2 this release in violation of 451" does not modify  
3 "subsequently attempted to cover up the facts."

4 Does that make any sense?

5 Q I'm not sure. 12:12:09

6 A I'll agree that it's a poorly constructed  
7 sentence.

8 Q Did you write this sentence?

9 A I probably did, but it doesn't -- that  
10 doesn't mean I'm not -- that I'm perfect in 12:12:20  
11 constructing sentences. I try to be better than  
12 this.

13 Q I understand and appreciate that,  
14 Ms. Felts.

15 What I'm trying to get at here is, I'm 12:12:35  
16 trying to focus on what the conduct at issue is that  
17 you're alleging is a violation of 451.

18 A I think the --

19 Q Based -- sorry. Can I -- I'm going to  
20 finish my question. 12:12:49

21 A Okay.

22 Q Based on what you just said now, would it  
23 be correct to state that it was the purposeful  
24 release that was the action or the conduct that you  
25 allege was the conduct at issue in the alleged 12:13:01

Page 413

1 violation? 12:13:06

2 MR. GRUEN: Objection. Misstates

3 testimony. If you want to go back to the header,

4 that's fine.

5 MR. STODDARD: I'm not going to go back. 12:13:12

6 It's a question the witness can answer. The

7 objection is noted.

8 MR. GRUEN: Okay. Understood.

9 THE WITNESS: Okay. Just a minute.

10 I'll go back to saying that the -- the 12:13:54

11 actual violation is as it's stated in the header for

12 No. 3, lines 20 -- starting at line 20 on page 1 of

13 this section.

14 BY MR. STODDARD:

15 Q Okay. So the violation is as it's stated 12:14:22

16 in the header, not in the concluding sentence?

17 A Yes.

18 Q Okay. Thank you.

19 So you're alleging that SoCalGas

20 purposefully extracted and vented oil into the 12:14:38

21 atmosphere, and this is primarily based on an

22 internal SoCalGas message.

23 Do you agree?

24 A That's my understanding.

25 MR. STODDARD: Pejman, can we introduce 12:15:19

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1 the next exhibit? 12:15:21

2 (Exhibit 2-03 was marked for

3 identification and is attached hereto.)

4 MR. GRUEN: Jack, can we go off the record

5 for a second just to coordinate with regards to us 12:15:45

6 efficiently downloading the exhibits?

7 MR. STODDARD: I'm sorry, Darryl. I

8 couldn't hear -- I couldn't hear what you said.

9 MR. GRUEN: I apologize. I'll try to

10 make -- I know that seems to be an ongoing thing, so 12:15:59

11 I'll try to make my statements clearer for you on

12 the record.

13 Would you be okay going off the record

14 just so we can effectively coordinate how, on our

15 end, we can efficiently download the exhibits that 12:16:12

16 you're sharing?

17 MR. STODDARD: I don't have a pending

18 question. If I can get through -- I mean, can we

19 just get through the next line of questioning, and

20 then we can take a short break? 12:16:26

21 MR. GRUEN: I think so. I just want to be

22 sure we have the exhibits downloaded on our end.

23 That's all.

24 MR. STODDARD: We will absolutely wait

25 until you guys are able to confirm downloading the 12:16:35

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1 exhibit. 12:16:39

2 MR. GRUEN: Understood.

3 MR. STODDARD: And if it presents a

4 problem, you know, we may need to break. But I

5 think -- it worked for the last one, so it should 12:16:44

6 work for this one.

7 MR. GRUEN: Yeah, it just took -- I have

8 it now.

9 MR. STODDARD: Yeah, it's not fast.

10 MR. GRUEN: Maybe if we just give others a 12:16:53

11 chance to weigh in, say when they have it

12 downloaded.

13 MS. PURCHIA: I have it downloaded.

14 MR. MOSHFEGH: Darryl, this is Pejman.

15 I'm also sharing the exhibit. I'm screen-sharing 12:17:10

16 the exhibit. So that by the time I've put the

17 document up on screen share, it should be available

18 to all parties in the evidence folder. And you may

19 need to just refresh that, that folder, but I'm also

20 sharing the very same exhibit that you can see 12:17:26

21 marked here as Exhibit 2-3.

22 MR. GRUEN: I appreciate that. Thanks,

23 Pejman. It's just hard to see on the screen share

24 just because the print is small.

25 MR. MOSHFEGH: Sure. Understood. And if 12:17:41

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1 anybody needs to me to enlarge it, to the extent it 12:17:42  
2 doesn't fall off your screen if I go too big, just  
3 let me know, and I can resize it.

4 I don't know if that shows up well for  
5 you, but I've made it fairly large. 12:17:54

6 MR. STODDARD: That's too big. That's too  
7 big just because of the position of the -- of the  
8 inset screens. I think that works, as long as --

9 Q Ms. Felts, can you see that okay?

10 A Yes. I'm actually looking at both 12:18:10  
11 screens, so I'm okay.

12 MR. GRUEN: Likewise. I'm okay.

13 Robyn, are you okay, too?

14 MS. PURCHIA: I'm okay. Thank you.

15 MR. GRUEN: Okay. Go ahead, Jack. 12:18:24

16 BY MR. STODDARD:

17 Q Ms. Felts, we were discussing previously  
18 that you alleged that SoCalGas purposefully  
19 extracted and vented oil into the atmosphere, and  
20 that this allegation is based on your interpretation 12:18:37  
21 of an internal SoCalGas message, correct?

22 A That's correct.

23 Q This document, which we will mark as  
24 Exhibit -- I think it's 2-3 -- thank you -- is -- is  
25 this the document that you are basing this testimony 12:19:01

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1 on? 12:19:05

2 A Yes.

3 Q And do you see where it says that it is  
4 dated November 13th, 2015, at 11:00 p.m.?

5 A Yes. 12:19:18

6 Q And it's described in the subject line as  
7 an open MCR.

8 Do you see that?

9 A Yes.

10 MR. STODDARD: I'm sorry. One moment. 12:19:29

11 Pejman, if you can put your cursor down  
12 while we're going through the document, unless  
13 that's my cursor. I think it's yours. There we go.  
14 Thank you.

15 Q Just to read it, it states, "Per incident 12:19:42  
16 commander Glenn La Fevers, during the repair process  
17 to mitigate the leak at the wellhead in Aliso  
18 Canyon, oil was extracted and was vented into the  
19 atmosphere. There is an oily mist that may  
20 potentially be moving into the Porter Ranch area. 12:19:57  
21 Customer service field, distribution and meter  
22 reading employees who are or may be headed to work  
23 in the area have been given instructions to avoid  
24 the Porter Ranch area until further notice. The  
25 customer contact center has been notified. If an 12:20:11

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1 A-1 is issued in the area, CSF employees are to take 12:20:15  
2 extreme caution when working the order."

3 Do you see that?

4 A Yes.

5 Q What in this message indicates to you that 12:20:32  
6 the extraction of oil was purposeful?

7 A The sentence, "During the repair process,  
8 to mitigate the leak at the wellhead in Aliso  
9 Canyon, oil was extracted and was vented into the  
10 atmosphere." 12:20:57

11 Q Can you explain a little bit further how  
12 you -- why you believe that this action was  
13 purposeful or what you mean by that?

14 A The way I read it, or read it, is that  
15 when it says "oil was extracted and was vented," 12:21:14  
16 that's a purposeful statement.

17 It could have said "oil was accidentally  
18 released," which would not be purposeful.

19 Q Can you explain how you believe SoCalGas  
20 or its kill contractor could have intentionally 12:21:38  
21 extracted and vented the oil into the atmosphere?

22 MR. GRUEN: Objection. Vague and overly  
23 broad.

24 She can answer.

25 THE WITNESS: No. 12:21:51

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1 BY MR. STODDARD: 12:21:51

2 Q So just to clarify, you don't have any

3 idea of how if one were to purposefully vent fluid

4 from a well in the course of a well kill operation,

5 how that would be done? 12:22:08

6 MR. GRUEN: Objection. Vague, overly

7 broad.

8 She can answer.

9 THE WITNESS: I could think of possible

10 options there, but I don't have any technical data 12:22:19

11 about what was happening just then on the well, so I

12 can't even propose a theory for this particular

13 incident.

14 BY MR. STODDARD:

15 Q And if you were to, such a theory would be 12:22:37

16 speculation; would you agree?

17 A Yes.

18 Q So aside from this message, you have no

19 basis for alleging that the extraction was

20 purposeful; is that correct? 12:22:50

21 A It's my interpretation of this message.

22 Q And that's the sole basis for your

23 testimony on this issue; is that correct?

24 A As far as it being purposeful, yes.

25 Q Putting aside how a purposeful extraction 12:23:15

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1 and venting would have occurred, do you have any 12:23:18  
2 idea as to why SoCalGas would have purposefully  
3 extracted and vented fluid into the atmosphere?

4 MR. GRUEN: Objection. Calls for  
5 speculation. 12:23:30

6 She can answer to the extent she's able.

7 THE WITNESS: I don't have specifics  
8 because, again, I don't have all the specific  
9 information that I would need.

10 But I would think that there could be a 12:23:48  
11 situation where there's overpressuring occurring in  
12 the -- in a well that they wanted to release.

13 BY MR. STODDARD:

14 Q What information would you need?

15 MR. GRUEN: Objection. Vague. 12:24:10  
16 Information would she need for what exactly?

17 BY MR. STODDARD:

18 Q Ms. Felts, you testified that you don't  
19 have the specifics because you don't have all the  
20 specific information that you would need. I'm 12:24:21  
21 asking what information you would need.

22 A Well, you'd have to have all of the  
23 realtime operating data, what was happening in the  
24 well. I'm not even sure that that data was reported  
25 or retained. 12:24:55

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1 Q Are you sure that that data was generated? 12:24:58

2 A No.

3 MR. GRUEN: Objection. Calls for

4 speculation.

5 Go ahead. 12:25:02

6 THE WITNESS: I don't know what data was

7 generated.

8 BY MR. STODDARD:

9 Q Thank you.

10 So on this issue, and regarding -- where 12:25:13

11 we're at, we're discussing why SoCalGas might have

12 intentionally extracted and vented oil into the

13 atmosphere, you don't know; is that correct?

14 A Ask that question again.

15 Q Ms. Felts, you don't know why SoCalGas, as 12:25:41

16 you allege, might have intentionally extracted and

17 vented oil into the atmosphere; isn't that correct?

18 A That's correct.

19 MR. STODDARD: Introduce exhibit data

20 response 23, please, Pejman. 12:26:09

21 (Exhibit 2-04 was marked for

22 identification and is attached hereto.)

23 BY MR. STODDARD:

24 Q While we're waiting for that exhibit, I

25 can briefly just ask another question that doesn't 12:27:19

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1 require the exhibit. 12:27:21

2 Ms. Felts, you indicated that one possible

3 reason for intentionally extracting and venting

4 fluid into the atmosphere would be that if the well

5 were overpressured; is that correct? 12:27:37

6 A I can think of a possibility there.

7 Q Do you have any particular knowledge of

8 instances where that's occurred?

9 A Instances where?

10 Q Are you aware of any precedent for that 12:27:57

11 occurring in a gas storage field operation?

12 A That's a pretty broad question.

13 Q I'm asking you whether you have any

14 experience or knowledge of your statement regarding

15 that being a possibility. 12:28:15

16 MR. GRUEN: Objection as overly broad.

17 Go ahead.

18 THE WITNESS: It's based on engineering

19 background.

20 BY MR. STODDARD: 12:28:26

21 Q Is it based on any particular experience

22 with a similar occurrence in the past?

23 A No.

24 Q Thank you.

25 I'm now seeing Exhibit 2-04. Ms. Felts, 12:28:44

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1 are you able to see that exhibit? 12:28:48

2 A Yes.

3 MR. GRUEN: And just for the record, I

4 think this is the fourth exhibit as indicated by

5 2-4, but I'm seeing five documents on Exhibit Share. 12:28:56

6 Is that by intent? Okay.

7 I see Exhibit 2-4 as Data Request 23. Is

8 that the one you want us to open, Jack?

9 MR. STODDARD: Yes.

10 MR. GRUEN: Margaret, Robyn, do you have 12:29:28

11 access to that?

12 THE WITNESS: Yes.

13 MS. PURCHIA: Yes.

14 MR. GRUEN: Okay. We're ready. Thank

15 you. 12:29:33

16 BY MR. STODDARD:

17 Q So this is Data Request No. 23 from

18 SoCalGas to SED.

19 A Okay.

20 Q Question -- one moment. In this data 12:29:53

21 request, SoCalGas asked whether you believed that

22 the MCR notice that we just reviewed represented a

23 verbatim transcript of something that was stated by

24 Mr. La Fevers.

25 A Where is that? 12:30:18

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1 Q Yeah. One second. We can get there. 12:30:20  
2 So this is Question --  
3 Can you blow it up a little bit, Pejman?  
4 Sorry. I'm having trouble seeing it.  
5 So Question No. 12 states, "Do you contend 12:30:51  
6 that the text of the MCR represents a verbatim  
7 transcription of the message Mr. La Fevers verbally  
8 communicated to dispatch?"  
9 Do you see that?  
10 A Yes. 12:31:07  
11 Q And Question 13 asks, "If your answer to  
12 Question 12 is anything other than an unqualified  
13 no, state all facts that support your contention."  
14 Do you see that?  
15 A Yes. 12:31:19  
16 Q Ms. Felts, do you recall if you assisted  
17 with preparation of the response to this question?  
18 A I'm sure I did.  
19 Q Do you recall what your response was?  
20 MR. GRUEN: I'm going to object as vague. 12:31:45  
21 It might be helpful to pull it up so  
22 she --  
23 BY MR. STODDARD:  
24 Q Do you recall what your response to this  
25 question was? 12:31:51

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1 MR. GRUEN: I'll note the vagueness 12:31:58  
2 objection again since the question was reasked.  
3 But she can answer.  
4 THE WITNESS: Without seeing the response,  
5 I can't tell you exactly what it was, but I think 12:32:10  
6 we -- I think I had to assume that it was a verbatim  
7 transcription because we didn't have any other  
8 evidence to the contrary.  
9 MR. STODDARD: Pejman, can we please enter  
10 the data response to this request? 12:32:39  
11 THE WITNESS: Is that another exhibit?  
12 MR. STODDARD: Yeah, which we'll mark as  
13 Exhibit -- I believe -- I want to make sure we're  
14 not numbering wrong -- 2-06. 2-05. Sorry.  
15 (Exhibit 2-05 was marked for 12:33:02  
16 identification and is attached hereto.)  
17 BY MR. STODDARD:  
18 Q While we're waiting, just to confirm --  
19 oh, here it comes.  
20 MR. GRUEN: Does everyone from SED have it 12:33:17  
21 up through Exhibit Share if they need?  
22 THE WITNESS: Is this Exhibit 5? 2-5?  
23 BY MR. STODDARD:  
24 Q This is SED's data response to SoCalGas'  
25 Data Request 23. 12:33:33

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1 Glenn La Fevers"? 12:35:02

2 MR. GRUEN: Objection. Calls for

3 speculation.

4 She can answer.

5 THE WITNESS: You're just talking about 12:35:17

6 the lead-in from the MCR person that was

7 responding -- that was relaying the message?

8 BY MR. STODDARD:

9 Q Yes. The person who was relaying the

10 message, part of the MCR states, "Per incident 12:35:25

11 commander Glenn La Fevers."

12 Does that sound to you like a verbatim

13 transcription?

14 A Well, I think when I'm talking verbatim

15 transcription, I'm talking about what the MCR 12:35:43

16 transcript is setting out.

17 So it wouldn't include those words. Those

18 are -- that was -- that's a statement as to the

19 source of the information.

20 Q So then you would expect that the 12:36:03

21 dispatcher who was transcribing it might have

22 included some of her own language to help explain

23 what was communicated?

24 A Well, exact -- I think those first words

25 that you just read -- I can't see the statement 12:36:24

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1 anymore so I'm kind of at a disadvantage here. 12:36:30

2 MR. STODDARD: We can put it back up.

3 Can we refer back to Exhibit 2-04?

4 THE WITNESS: Okay.

5 MR. STODDARD: Sorry. Exhibit 2-03. And 12:36:48

6 again, this is the MCR on which Ms. Felts is basing

7 her testimony that the extraction was purposeful.

8 THE WITNESS: Okay. So I would say

9 everything from the start, "Sempra," through the

10 first period is a statement by whoever took the 12:37:10

11 report and was sending it out.

12 And then everything after that period

13 starting with "During" through the end of

14 "order," period, the last sentence, would be the

15 statement she -- she is quoting exactly from 12:37:32

16 Mr. La Fevers.

17 And then the last thing -- last entry that

18 starts with "From" and then has the phone number and

19 the sent time, that would be something that the MCR

20 person added. 12:37:54

21 BY MR. STODDARD:

22 Q Thank you.

23 You're speculating here, aren't you,

24 Ms. Felts?

25 A I'm speculating? 12:38:05

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1 Q Yeah. Aren't you speculating? Wouldn't 12:38:06  
2 you agree that this is speculative, your testimony  
3 about which portions of this MCR are likely verbatim  
4 versus something that came from another source?

5 A I'm just basing it on my experience with 12:38:21  
6 these types of communications that occur, and I --  
7 we asked several times for additional information  
8 from SoCalGas to clear this up and received no  
9 responses to explain it.

10 So we have assumed what I just stated. 12:38:43

11 Q What is your experience with these sorts  
12 of communications?

13 A What do you mean by what is my experience?

14 Q I believe you stated, "I'm just basing it  
15 on my experience with these types of communications 12:38:59  
16 that occur."

17 A Well, I have worked in companies that have  
18 message centers. I've worked in the State of  
19 California that has message centers. They all work  
20 pretty much the same. 12:39:18

21 Q Can you explain exactly how that works?

22 A Someone calls in with a message that they  
23 want distributed to a mail list or a phone list.  
24 The message is recorded, and then the source is  
25 identified, and the time. I don't know about phone 12:39:37

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1 number. But the time and source of the data is 12:39:42  
2 added to the message.

3 Q Do you have any specific examples of  
4 message centers that you would contend are similar  
5 to the MCR process that SoCalGas employed here? 12:39:56

6 A Not -- as I sit here today, I can't refer  
7 you to one. I just told you, there are -- I've been  
8 involved with and worked at corporations and the  
9 State of California, all had similar services.

10 Q The State of California would be one 12:40:32  
11 example, and that would be your experience with the  
12 DTSE; is that correct?

13 A Yes.

14 Q Okay.

15 A Also, the Department of Defense, I worked 12:40:40  
16 there. They had a message center. Amaco had a  
17 message center. Celanese had a message center.

18 Q When you -- have you worked as a  
19 dispatcher to transcribe MCRs?

20 A No. 12:40:57

21 Q Have you called in a message to be  
22 distributed via an MCR?

23 A Probably, but I can't cite to when.

24 Q Do you recall any instance where you  
25 specifically investigated a notice like this to 12:41:15

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1 determine whether or not it was paraphrasing a 12:41:19  
2 statement or a verbatim transcription of a  
3 statement?

4 A No. I don't ever recall any instance  
5 where that question came up. 12:41:32

6 Q You don't have any basis for really  
7 determining what here might be a paraphrase versus a  
8 verbatim transcription, do you, Ms. Felts?

9 A No. I think that would actually just be a  
10 general statement that you can make about literally 12:41:48  
11 every piece of data that SoCalGas has given to us  
12 and that I've read.

13 I have no basis for understanding the  
14 truth of any of the documents that SoCalGas has  
15 provided. 12:42:06

16 Q Thank you.

17 One more question. Would you agree that  
18 it's possible that dispatch paraphrased the message  
19 that Mr. La Fevers conveyed over the phone?

20 MR. GRUEN: Objection. Calls for 12:42:28  
21 speculation.

22 THE WITNESS: I would say that it's highly  
23 unlikely.

24 BY MR. STODDARD:

25 Q Highly unlikely? 12:42:44

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1 MR. GRUEN: Yeah. I don't see a concern. 12:44:30  
2 I think the exhibits seem to be working okay. I'm  
3 open to feedback from Margaret and Robyn on that.  
4 THE WITNESS: I'm okay with them.  
5 MR. GRUEN: Okay. So I don't see a 12:44:41  
6 concern with that if that facilitates moving things  
7 forward.  
8 Robyn, anything on your end? Any  
9 concerns?  
10 MS. PURCHIA: I've been fine with the 12:44:50  
11 exhibits.  
12 MR. GRUEN: Okay. Yeah. If you want to  
13 break for lunch early, we're happy to do that.  
14 MR. STODDARD: We'll reconvene at 12:45?  
15 MR. GRUEN: Margaret, does that work okay 12:45:05  
16 for you?  
17 THE WITNESS: Are you talking 12:45 my  
18 time?  
19 MR. STODDARD: No. Sorry. I'm talking --  
20 assuming I have the right time here, it's 11:45 12:45:14  
21 Pacific. We'd be reconvening at 12:45 Pacific,  
22 which I suppose would be 1:45 your time.  
23 THE WITNESS: Okay.  
24 THE VIDEO OPERATOR: We're now going off  
25 the record. The time is 12:45 p.m. This is the end 12:45:27

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1 of Media 2. 12:45:31

2 (Recess, 12:45 p.m. - 1:51 p.m.)

3 THE VIDEO OPERATOR: We are now back on

4 the record. This is the beginning of Media 3. The

5 time is 1:51 p.m. 13:51:04

6 MR. STODDARD: Thank you.

7 Q Ms. Felts, picking up where we left off,

8 before we broke, we had discussed briefly statements

9 made in connection with Violation 331 in your

10 testimony related to an alleged cover-up. 13:51:26

11 Do you recall that discussion?

12 I think you're on mute.

13 A Is that better?

14 Q Yes.

15 MR. GRUEN: Yes. 13:51:46

16 THE WITNESS: You're referring to the last

17 sentence in the testimony we were reading?

18 BY MR. STODDARD:

19 Q Correct.

20 A Okay. 13:51:54

21 Q Are you still alleging that there was a

22 cover-up?

23 A It looks like it's not a part of the

24 actual safety violation.

25 Q So the cover-up is not relevant to the 13:52:13

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1 alleged violation? 13:52:16

2 A The violation is based on an MCR report,  
3 and it's stated in the heading. The heading doesn't  
4 say anything about a cover-up.

5 Q Understood. So you agree that it's not 13:52:36  
6 relevant to the violation, correct?

7 A I think what I said is it's not part of  
8 the violation. It could be relevant.

9 Q Ms. Felts, would you be amending or  
10 retracting the testimony you stated related to 13:52:57  
11 cover-up?

12 A I don't know. I think I'll have to think  
13 about that and discuss it with counsel.

14 Q Okay. Well, I have lot of questioning  
15 related to the cover-up, and I suppose we can 13:53:11  
16 proceed with it, unless you'd like to take a break  
17 and discuss that with counsel now.

18 THE WITNESS: Darryl?

19 MR. GRUEN: I don't think it's necessary  
20 to. I think unless you need a break, Ms. Felts, 13:53:23  
21 we're prepared to proceed.

22 THE WITNESS: Okay.

23 BY MR. STODDARD:

24 Q Okay. With regards to your allegations  
25 regarding a cover-up with SoCalGas, as you sit here 13:53:37

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1 today, was this in connection with the fact that the 13:53:41  
2 release was purposeful and the geyser that resulted  
3 and went 60 feet in the air, that's the cover-up  
4 you're alleging?

5 A Yes. 13:54:03

6 Q And what's the basis for the alleged --  
7 for your allegation regarding a cover-up?

8 A I think that our concern was that this  
9 particular release or event was not reported in  
10 daily reports or the Boots & Coots daily summary. 13:54:19  
11 We didn't see it -- I didn't see it anywhere in the  
12 records of -- the day-to-day records of what was  
13 going on on the well kill.

14 Q And again, did you speak with anybody  
15 about the November 13th event who was present at the 13:54:45  
16 site?

17 A No.

18 Q And you reviewed SoCalGas's reply  
19 testimony on this issue, correct?

20 A Yes. 13:54:57

21 Q And you responded to Mr. La Fevers' point  
22 that DOGGR was present at the field in your  
23 sur-reply testimony, correct, or your supplemental  
24 sur-reply? Sorry.

25 A Yes. 13:55:18

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1 Q And you indicated that you doubted that 13:55:18  
2 the update that Mr. La Fevers referred to in his  
3 testimony was, in fact, prepared by DOGGR; is that  
4 correct?

5 A Can you show me what you're referring to 13:55:37  
6 in testimony or quote it exactly?

7 Q Sure. We can get there in a second.

8 Do you contend that DOGGR was not present  
9 at the November 13th, 2015, release?

10 A No, I've confirmed via records that they 13:55:54  
11 were there.

12 Q That they were present during the release?

13 A Yes.

14 Q And you confirmed that -- do you recall  
15 the specific DOGGR personnel who you confirmed were 13:56:06  
16 present for the November 13th, 2015, release?

17 A Let me modify my comment there.

18 I've confirmed that DOGGR was present on  
19 that day, but also that they left early before the  
20 work on the well was completed that day. 13:56:29

21 Q What's your basis for concluding that they  
22 left early?

23 A That is in a -- either the DOGGR timeline  
24 or DOGGR memo. Somewhere they recorded that -- the  
25 events of the day and said that they left at, I 13:56:52

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1 believe, 3:00 o'clock. 13:56:58

2 Q And you're aware of the evidence and

3 Mr. La Fevers' testimony that DOGGR was present and

4 noted the release, correct?

5 A I'm aware of that testimony. 13:57:17

6 Q And do you recall what was referred to as

7 the update in connection with that testimony? You

8 referred to it in your testimony as the update.

9 A The update to DOGGR's timeline or report

10 or -- is that what you're talking about? 13:57:37

11 Q Yes.

12 A Yes, there were two different -- two

13 different reports of events of that day.

14 Q And do you contend that the document that

15 indicates DOGGR personnel was present for the 13:57:53

16 release was not, in fact, written by DOGGR?

17 MR. GRUEN: I'm going to note an objection

18 for the record here.

19 Just to be clear, these questions are

20 asking about Ms. Felts's testimony, but Ms. Felts is 13:58:08

21 not being showed the testimony at this point. So

22 the objection is for vagueness.

23 She can answer if she's able.

24 THE WITNESS: What I recall is that there

25 are two or more statements or summaries or timelines 13:58:26

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1 that were ostensibly prepared by the same person at 13:58:37  
2 DOGGR that are inconsistent between themselves. So  
3 I can't really reconcile that without additional  
4 information.

5 BY MR. STODDARD: 13:58:55

6 Q Okay. But you don't contend that they  
7 weren't both prepared by DOGGR personnel?

8 A No.

9 Q Okay. And it's possible, Ms. Felts, that  
10 an account of the same incident or event even 13:59:11  
11 recounted by the same person could be described in  
12 two different ways; isn't that true?

13 MR. GRUEN: Objection. Overbroad, vague.

14 She can answer.

15 THE WITNESS: Are you asking me if it's 13:59:24  
16 possible one person could write two different  
17 accounts of the same event?

18 BY MR. STODDARD:

19 Q Yeah, that's what I'm asking.

20 MR. GRUEN: I'll restate the objection. 13:59:34  
21 It's overly broad and vague.

22 But she can answer.

23 THE WITNESS: I think that's possible.

24 BY MR. STODDARD:

25 Q So Ms. Felts, the only basis you have for 13:59:44

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1 questioning the events that are -- that are 13:59:46  
2 recounted in the documents that we're discussing is  
3 the inconsistency in the documents themselves,  
4 correct? The alleged inconsistency?

5 A No. 14:00:04

6 MR. GRUEN: I'll restate an objection for  
7 vagueness without being shown the testimony she's  
8 being asked questions about.

9 She can answer to the best of her ability.

10 BY MR. STODDARD: 14:00:13

11 Q Go ahead.

12 A It's not just that they're inconsistent  
13 internally between the documents, but also that an  
14 account of the event as it was described in  
15 Mr. La Fevers' report to the MCR was not actually  
16 present in those documents by DOGGR.

17 MR. STODDARD: All right. Let's turn to  
18 the update, and this is Exhibit I-1 of  
19 Mr. La Fevers' supplemental rebuttal testimony.

20 Pejman, if we could please introduce this 14:01:03  
21 as Exhibit 2-06.

22 (Exhibit 2-06 was marked for  
23 identification and is attached hereto.)

24 MR. STODDARD: This might take a second to  
25 upload.

14:01:47

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1 MR. MOSHFEGH: Apologies, everyone. This 14:03:05  
2 is Pejman. It's taking a little time to upload, but  
3 it's almost there.

4 MR. GRUEN: Thanks, Pejman. We'll stand  
5 by. 14:03:15

6 For the SED folks, I've just refreshed,  
7 and I see it, Exhibit 2-06, now in the "Marked  
8 Exhibits" folder, and I'm downloading.

9 BY MR. STODDARD:

10 Q I'll direct you -- this is page 14 -- this 14:04:20  
11 is a large PDF, obviously, but this is page 14 of  
12 the PDF, Exhibit I-1. And I'll give you a moment to  
13 review it.

14 MR. GRUEN: Margaret, Robyn, do you both  
15 have access to the Exhibit 2-06 in the shared 14:04:39  
16 exhibits file?

17 THE WITNESS: Yes.

18 MS. PURCHIA: Yes.

19 MR. GRUEN: Okay. Thank you.

20 And Jack, just for clarification, on the 14:04:51  
21 version I'm looking at, page 14 in the shared  
22 exhibits folder is just a cover page, Exhibit I-1.  
23 Is that what you want us to look at?

24 MR. STODDARD: No. Starting at page 14 --  
25 sorry. Starting at page 14, the following document, 14:05:08

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1 which is the update that we've been discussing. It 14:05:12  
2 follows on to the next two pages.

3 MR. GRUEN: Okay.

4 BY MR. STODDARD:

5 Q I don't want to rush you. Let me know 14:06:15  
6 when you've had a chance to review.

7 A Okay. Okay.

8 MR. STODDARD: Thank you.

9 Pejman, if we can just quickly scroll to  
10 the top of this document. 14:07:22

11 Q You'll see that it's described as an  
12 update from DOGGR field staff.

13 Do you see that?

14 A Yes.

15 Q And this is dated November 13th, 2015. 14:07:32  
16 Do you see that? If we can scroll down to  
17 the third paragraph.

18 A Okay.

19 Q And you see there where it states that "I  
20 was then called to the SS-25 site to witness the 14:07:52  
21 pumping operations. I did not have a time piece  
22 with me as all electronics were removed from the  
23 site. Therefore, times are estimated here."

24 Does this indicate that the author of this  
25 was present at Aliso Canyon on that day? 14:08:09

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1           A    This is the -- you're talking about the           14:08:18  
2   author of the update, not the author of the e-mail?

3           Q    The author of the update.

4           A    Yes.

5           Q    And you see below where it says in the           14:08:26  
6   following paragraph, "At about 100 bbls away or so,  
7   the well began to blow out to service despite having  
8   the choke at 100 percent open.  A large column of  
9   gas, aerated mud, and rock formed a geyser around  
10  the wellhead.  Mud brine also began to flow from the       14:08:48  
11  well around the wellhead fissures."

12                    Do you see that?

13           A    Yes.

14           Q    And "bbls" there refers to barrels; is  
15  that your understanding?                                       14:09:00

16           A    Yes.

17           Q    Does this indicate that the author of the  
18  update was also present for the release that day?

19           A    I -- I can't actually say that because the  
20  description here doesn't match Mr. La Fevers'               14:09:17  
21  description of what happened.

22           Q    So you're choosing to treat -- I mean, and  
23  your basis for that is, again, an assumption that  
24  that MCR was a verbatim transcription?

25                    MR. GRUEN:  Objection.  Misstates           14:09:36

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1 testimony. 14:09:36

2 THE WITNESS: Just a minute. Let me go  
3 back and look at that statement. It was Exhibit 3,  
4 right?

5 MR. GRUEN: For the record, Exhibit 3 14:09:55  
6 refers to the internal statement from Mr. La Fevers;  
7 is that correct?

8 THE WITNESS: The MCR statement. Yeah.

9 So Mr. La Fevers reported that at the  
10 wellhead oil was extracted and vented into the 14:10:21  
11 atmosphere.

12 And then in this statement that we were  
13 just looking at -- let me back up -- the DOGGR  
14 person says that the well began to blow out to  
15 surface, which I would take to mean out of the soil 14:10:49  
16 at the surface. A large gas of aerated mud and rock  
17 formed a geyser around the wellhead, and then it  
18 talks about brine beginning to flow from the well  
19 fissures.

20 So I can't really reconcile the two 14:11:20  
21 descriptions. The one in your Exhibit 3, the MCR  
22 message, would appear to suggest that pressure was  
23 released from the well itself, oil was extracted and  
24 vented to the atmosphere.

25 So -- and the other one appears to be the 14:11:43

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1 reported event of where mud, oil, and gas comes up 14:11:46  
2 through the soil around the wellhead. It's  
3 confusing.

4 BY MR. STODDARD:

5 Q Ms. Felts, do you have any basis for 14:12:06  
6 doubting that the author of this update was simply  
7 reporting what he observed that day?

8 A No. I think that's exactly what he was  
9 doing.

10 Q And do you have any basis for doubting his 14:12:18  
11 description of the event?

12 A No. I think he's describing what he saw.

13 Q Okay. Thank you.

14 MR. GRUEN: Just for clarification for the  
15 record, I want to be sure. The answer to that last 14:12:43  
16 statement says, "No. I think he's describing what  
17 he saw."

18 Ms. Felts, was that an accurate  
19 transcription of the answer that you gave?

20 THE WITNESS: So the question was whether 14:13:00  
21 I had -- whether I had any doubt, right?

22 MR. STODDARD: That's correct.

23 THE WITNESS: And I said no.

24 MR. GRUEN: Okay. Thank you.

25 MR. STODDARD: Just to clarify, it was the 14:13:11

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1 description of the event. 14:13:13

2 THE WITNESS: And in all of that, we were

3 referring to the exhibit that's up right now,

4 Exhibit 6.

5 MR. GRUEN: 2-06. 14:13:35

6 THE WITNESS: The statement by the DOGGR

7 person.

8 BY MR. STODDARD:

9 Q Ms. Felts, that same paragraph which we

10 were just reviewing -- if we could scan back up 14:13:46

11 there -- thank you -- in the sentences you referred

12 to about the blow-out to surface despite having the

13 choke 100 percent open, is there anything in that

14 statement that indicates to you that this event was

15 purposeful? 14:14:04

16 A No.

17 Q Is there anything else in this paragraph

18 that would suggest to you that this event was

19 purposeful?

20 A No. 14:14:16

21 MR. STODDARD: Thank you.

22 Next I'd like to introduce Exhibit 2-7,

23 please. It's SED's response to -- sorry -- SED Data

24 Request 123; and at the same time, SoCalGas's --

25 just for purposes of marking -- SoCalGas's response 14:14:40

1 to Data Request 123, as Exhibits 2-7 and 2-8. 14:14:42  
2 (Exhibit 2-07 and 2-08 were was marked for  
3 identification and are attached hereto.)  
4 BY MR. STODDARD:  
5 Q And we're including both exhibits for 14:14:57  
6 completeness, but I'm just going to be referring to  
7 2-8 which includes both the question and answer.  
8 Please refer to Questions 2 and 3.  
9 MR. GRUEN: For the record, I'm still  
10 downloading Exhibit 2-8. 14:16:05  
11 MR. STODDARD: Sorry. I'll wait.  
12 MR. GRUEN: Thank you.  
13 BY MR. STODDARD:  
14 Q Margaret, have you been able to access it  
15 in the file? 14:16:17  
16 A I have Exhibit 7 up. I do not have an  
17 Exhibit 8.  
18 Q Let's review it on the screen, and we can  
19 see if you need additional time to review it. But  
20 we're only referring to Questions 2 and 3 here, so I 14:16:57  
21 don't -- if you need to review the rest of the  
22 document, let me know, but it shouldn't be  
23 necessary.  
24 As you'll see, Question 2 asks -- and this  
25 is a question from SED to SoCalGas. Again, this is 14:17:08

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1 SED Data Request 123, and this is SoCalGas's 14:17:11

2 response to it.

3 And Question 2 asks SoCalGas to state the

4 basis for SoCalGas's understanding that Kris

5 Gustafson was the field engineer who wrote the 14:17:27

6 content of the forwarded message with the subject

7 heading "Aliso Update" in the exhibit we were just

8 reviewing, which is Exhibit I-1 to Glenn La Fevers'

9 testimony.

10 Do you see that? 14:17:42

11 MR. GRUEN: I'm going to object as lacking

12 foundation here.

13 This has been represented as Data Request

14 123, but we don't have acknowledgment from the

15 witness that she recognizes -- or the dates or 14:17:53

16 anything like that of the data request and data

17 response.

18 BY MR. STODDARD:

19 Q Ms. Felts, has the document downloaded yet

20 for you, or uploaded, or still -- 14:18:12

21 A I have Exhibit 7.

22 Q But not 2-08? Okay. Let's review it

23 here.

24 Ms. Felts, do you see that this is

25 entitled "Data Request SED-SCG-123 Dated 14:18:20

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1 November 17, 2020"? 14:18:26

2 A Yes.

3 Q And SoCalGas' response dated

4 November 20th, 2020?

5 A Okay. The response is included in 14:18:34

6 Exhibit 7, 2-7?

7 Q This is Exhibit 2-08.

8 A Oh, wait. So I'm on the wrong one then.

9 Q So if you look at your screen --

10 A I only have up to -- wait. Let me close 14:18:51

11 it out and start again.

12 Okay. Here it is. Okay. I'm opening

13 2-08. Is that what you wanted me to look at?

14 Q Yes.

15 A Okay. 14:19:09

16 Q 2-07 we were marking for purposes of

17 completeness, which is SED's Data Request 123. I

18 just lost the document on the screen.

19 A That's okay. I have it.

20 Q I need it. Hold on a second. 14:19:26

21 Again, this is -- so this is, for purposes

22 of marking, 2-07, SED 123 issued --

23 Can you stay there for a second?

24 -- issued November 17th, 2020.

25 Do you see that? 14:19:46

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1 A You're back on 2-07 now? 14:19:49

2 Q Yeah. Sorry. We're just marking this one  
3 for admission, and then we'll move on to 2-08.

4 A Okay.

5 Q Then if we can quickly look at Questions 2 14:19:56  
6 and 3.

7 A On 2-07?

8 Q Yep. And you'll see up here SoCalGas's  
9 Response No. 8 is quoted at the top of the request,  
10 and this is from a response to SED Data Request 19. 14:20:17

11 Do you see that?

12 A Just a minute. Yes.

13 Q And about the third sentence down or  
14 fourth sentence down, it says, "SoCalGas  
15 Response 8," and then it quotes SoCalGas's response 14:20:38  
16 which said -- and this is in connection with the  
17 Aliso update -- "SoCalGas obtained this document  
18 through a California Public Records Act request, and  
19 SoCalGas understands the field engineer was Kris  
20 Gustafson." 14:20:56

21 Do you see that?

22 A Yes.

23 Q Is it your understanding that Kris  
24 Gustafson is a DOGGR engineer, Ms. Felts?

25 A Yes. 14:21:13

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1 Q Question 2 asks, "State the basis for 14:21:14  
2 SoCalGas's understanding that Kris Gustafson was the  
3 field engineer who wrote the content of the  
4 forwarded message with the subject heading 'Aliso  
5 Update' in the Exhibit I-1." 14:21:24

6 Do you see that?

7 A Yes.

8 Q Question 3 states, "Provide all  
9 documentation that shows all bases for SoCalGas's  
10 understanding that Kris Gustafson was the field 14:21:34  
11 engineer who wrote the content of the forwarded  
12 message with the subject heading 'Aliso Update' in  
13 Exhibit I-1."

14 Do you see that?

15 A Yes. 14:21:44

16 Q Okay. Thank you.

17 Now we're going to move to SoCalGas's  
18 response to 123, which, again, has been marked as  
19 Exhibit 2-08, and we'll share it on the screen.

20 If you can scroll to the top, Pejman, 14:22:08  
21 briefly.

22 Do you see that this document is entitled  
23 "SoCalGas Response Dated November 20, 2020"?

24 Stay up there, please.

25 Do you see that, Ms. Felts? 14:22:27

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1 A Where are you? 14:22:31

2 Q At the top of Exhibit 2-08.

3 A Yes, I see it.

4 Q So you see that -- you see in the

5 parenthesis that it's Data Request SED-SoCalGas-123 14:22:39

6 dated November 17th, 2020?

7 A Yes.

8 Q And this is SoCalGas's response on

9 November 20th.

10 Please scroll down. 14:22:53

11 Again, Question 2 was inquiring as to the

12 basis for SoCalGas's understanding that

13 Mr. Gustafson was the field engineer who wrote the

14 content of the Aliso update in Exhibit I-1, and

15 you'll see Response 2 there which states, 14:23:17

16 "SoCalGas's understanding is based on

17 Mr. Gustafson's statement on January 28th, 2020."

18 Do you see that?

19 A Yes.

20 Q And in Question 3, it requests 14:23:28

21 documentation that shows the bases for SoCalGas's

22 understanding.

23 Do you see that?

24 A Yes.

25 Q And Response 3 refers to a Bates-stamped 14:23:37

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1 production that was enclosed. 14:23:42

2 Do you see that?

3 A Yes.

4 Q And it's marked "I1906016 SCG SED DR 123

5 3 through 10." 14:23:53

6 A Yes.

7 Q Ms. Felts, do you recall reviewing that

8 data response or the records produced in connection

9 with that?

10 A I think it's part of a deposition. I 14:24:09

11 mean, part of a -- part of a deposition.

12 MR. STODDARD: That's correct.

13 Pejman, so you're aware, I think we're

14 seeing your entire screen right now.

15 If we could now move the deposition 14:24:43

16 transcript as an exhibit, Pejman. And this would be

17 Exhibit 2-09.

18 (Exhibit 2-09 was marked for

19 identification and is attached hereto.)

20 BY MR. STODDARD: 14:25:13

21 Q Ms. Felts, since you recall that this was

22 a deposition, do you recall -- here we go with the

23 last question.

24 This is Exhibit 2-09, and you see that it

25 is -- this is a cover page for a deposition 14:25:30

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1 transcript? 14:25:33

2 MR. GRUEN: Jack, if I can, we're still

3 waiting for the exhibit to be shared in the "Marked

4 Exhibits" folder. I wonder if you might bear with

5 us. 14:25:48

6 MR. STODDARD: Sure.

7 THE WITNESS: Okay. I have it.

8 MR. GRUEN: Bear with me. I'm a step

9 behind.

10 BY MR. STODDARD: 14:25:57

11 Q Ms. Felts, if you want to take a moment to

12 review while we're waiting.

13 MR. GRUEN: I see it now. I'm downloading

14 it as we speak.

15 Sorry, Jack. Did you want us to go 14:26:11

16 somewhere on this exhibit?

17 MR. STODDARD: Yeah. I'm going to first

18 just describe what the document is, and then we

19 can --

20 MR. GRUEN: Okay. 14:26:23

21 MR. STODDARD: -- walk through parts

22 together.

23 MR. GRUEN: Understood.

24 MR. STODDARD: Do you have it, Darryl?

25 MR. GRUEN: Yes, I do. I'm ready. Thank 14:26:36

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1 you. 14:26:37

2 BY MR. STODDARD:

3 Q Again, the cover page identifies this

4 document as the transcript for the videotaped

5 deposition of Kristopher R. Gustafson. 14:26:41

6 Do you see that?

7 A Yes.

8 Q And it's dated January 28th, 2020.

9 Do you see that?

10 A Yes. 14:26:49

11 MR. STODDARD: Pejman, if we could please

12 move down to line 70. Sorry. Page 70. It's 75.

13 All right. 75, line 16. Stop there.

14 Q Ms. Felts, if you see here, the question,

15 which is stated by an attorney, states, "Let me mark 14:27:25

16 as Exhibit 224-5 an e-mail from Benjamin Turner to

17 Katherine Moore that was produced by DOGGR. The

18 subject is Aliso update, and the date is Friday,

19 November 13th, 2015."

20 Do you see that? 14:27:39

21 A Yes.

22 Q And the date, November 13th, 2015, is the

23 same as the date of the release, correct?

24 A Yes.

25 Q Next, the exhibit was marked for 14:27:51

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1 identification, and the witness asked for a second 14:27:53  
2 with her counsel. We don't need to review that  
3 part.

4 If we could move forward to the  
5 transcript, 77, line 17. This indicates, "This 14:28:06  
6 e-mail says, 'Here is an update from a field  
7 engineer,' and it's dated November 13th, 2015. Do  
8 you see that?

9 "What part?"

10 "The very beginning, first line." 14:28:25

11 "Answer: Very good. Yes."

12 "Question: Okay. And then, the update  
13 from the field engineer starts off saying, 'Today  
14 was an extremely eventful day at the SS-25 site.  
15 Bruce Hesson'" -- and then he spells "Hesson" -- 14:28:38

16 "'and I arrived at the command post at 6:30 this  
17 morning. We were quickly briefed by Todd  
18 Van de Putte with SoCalGas on the day's operations.'  
19 And then it goes on to describe the activities" of  
20 that day. 14:28:52

21 And it asks, "Was this an update that you  
22 provided?"

23 And the answer from the witness is "It was  
24 an update that I wrote."

25 Do you see that? 14:29:02

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1 Q And you'll recall we were looking at the 14:30:10  
2 third paragraph of the document we were looking at  
3 as well, correct?

4 A Yes.

5 Q And here it states, "'At about 100 barrels 14:30:19  
6 away or so, the well began to blow out to surface  
7 despite having the choke at 100 percent open. A  
8 large column of gas, aerated mud, and rock formed a  
9 geyser around the wellhead. Mud brine also began to  
10 flow from around the wellhead fissures.' Is that 14:30:33  
11 your description of what you saw on that day,  
12 Mr. Gustafson?"

13 And the answer is "Yes."

14 Do you see that?

15 A Yes. 14:30:42

16 Q We can refer back to the other document if  
17 we need to.

18 Does this sound like the same language  
19 that we just discussed a moment ago from the update  
20 that was attached to Mr. La Fevers' testimony? 14:30:52

21 A It appears so just reading from it, yes.

22 Q Yes. And based on his testimony here in  
23 the transcript, you would agree that this is --  
24 Mr. Gustafson is testifying that this is, in fact,  
25 his description of the event, correct? 14:31:10

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1           Are you guys -- it's fine if you want to           14:33:09  
2 refer to the document separately, but I just want to  
3 also confirm that you can see the screen share.

4           A    Yeah, I can see the screen share.

5           Q    Okay.   14:33:18

6           MR. GRUEN:   Yes, I can as well.

7 BY MR. STODDARD:

8           Q    Do you have the document open, Ms. Felts,  
9 or are you reviewing?   Sorry.   Go ahead.

10          A    Are we looking at Question 6?                   14:33:35

11          Q    That's correct.

12                Question 6 says, "State whether you  
13 reviewed SoCalGas's November 20th, 2020 document  
14 production and response to SED Data Request 123  
15 before sponsoring your excerpted sur-reply testimony       14:33:51  
16 above, which was served on November 24th, 2020."

17                And your response states yes, you did.

18                Do you see that?

19          A    Okay.

20          Q    Subject to objections.                           14:34:10

21                So to correct the record, a moment ago you  
22 said you didn't have this for your testimony, but  
23 just to clarify, you did, and you indicated you did  
24 review it; is that correct?

25          MR. GRUEN:   I'm going to object to some           14:34:21

1 mischaracterization of testimony to the extent that 14:34:24  
2 Question 6 asks for whether SoCalGas' response to  
3 the November 20th, 2020, document production in  
4 response to SED Data Request 123 was produced.

5 But as identified, when laying foundation 14:34:45  
6 by counsel, if my recollection is correct, the  
7 actual data response that was identified was, in  
8 fact, produced on November 23rd, the day before  
9 SED's November 24th testimony was due. So this is a  
10 mischaracterization of Ms. Felts' testimony. 14:35:01

11 With that, she can answer the question.

12 THE WITNESS: So as I recall, I did not  
13 have the transcript of the deposition to review  
14 before my testimony was issued. But I may have had  
15 the answers -- the answer to the data request. 14:35:30

16 BY MR. STODDARD:

17 Q So the data request was served, but you  
18 wouldn't have had access to the record?

19 A To that exhibit, to the -- yeah. So it  
20 referred to Bates numbers that -- I think I had to 14:35:52  
21 obtain that document before I could review it.

22 Q Why weren't you able to obtain those  
23 records?

24 A I'm not sure. Sometimes things get  
25 delayed. You're talking about -- if the testimony 14:36:12

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1 was published on the 24th, it would have been out of 14:36:17  
2 my hands by, say, at least the 22nd, maybe earlier,  
3 because it has to go through a certain amount of  
4 publishing logistics at the Public Utilities  
5 Commission. 14:36:33

6 So then if your response came in on the --  
7 or SoCalGas's response came in on the 23rd, I  
8 probably saw the response because I probably opened  
9 the e-mail, but then I have to obtain the exhibits  
10 through a separate link that has to be provided by 14:36:54  
11 SoCalGas, and those usually are delayed a couple of  
12 days, sometimes a week.

13 Q So it's possible that you hadn't reviewed  
14 this testimony and this deposition transcript at the  
15 time you -- 14:37:14

16 A I know I didn't see it before I wrote my  
17 testimony. I remember thinking that if I had seen  
18 it, I would have written testimony slightly  
19 differently.

20 Q How would you have written it differently? 14:37:27

21 A Well, I would have acknowledged the  
22 deposition. In fact, it might have been an  
23 attachment.

24 Q How do you view the deposition as  
25 relevant? 14:37:38

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1 Q Down -- 14:40:59  
2 Scan down to the next paragraph, Pejman.  
3 MR. GRUEN: Sorry. I'm in the shared file  
4 server. What page is this?  
5 MR. STODDARD: Sure. We're looking at 14:41:20  
6 page -- I'm sorry. I can't see the PDF pages right  
7 now.  
8 MR. GRUEN: Okay.  
9 MR. STODDARD: Page 16 of 158 of the PDF.  
10 MR. GRUEN: Okay. I'm there. Thank you. 14:41:44  
11 I'll defer to Ms. Felts to be sure that she's there  
12 as well, that she has what she needs.  
13 MR. STODDARD: Can you scroll down,  
14 Pejman, to 16 of the PDF? There we go.  
15 THE WITNESS: Okay. 14:42:20  
16 MR. STODDARD: All right. I can't see  
17 go -- one moment. I'm not seeing the language  
18 I'm --  
19 Q Ms. Felts, at the top of the -- I can't  
20 tell from right here whether this is the third 14:42:52  
21 paragraph or the second paragraph on this page.  
22 If you can scroll up briefly, Pejman.  
23 All right. It's the third paragraph down.  
24 Do you see the sentence that starts "We then  
25 walked"? 14:43:05

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1 A Yes. 14:43:05

2 Q It states, "We then walked back to the  
3 SS-25 site. After speaking with Bret Lane and Danny  
4 Clayton with Boots & Coots, it was agreed that the  
5 operator should continue to pump the well despite 14:43:15  
6 the surface gas leakage as this may be the best  
7 opportunity to kill the well."

8 Do you see that?

9 A Yes.

10 Q This suggests that the author of this 14:43:26  
11 update spoke with both Mr. Lane as well as Danny  
12 Clayton with Boots & Coots, and that the three of  
13 them agreed that SoCalGas and Boots & Coots should  
14 continue to pump.

15 Do you agree? 14:43:43

16 A Yes.

17 Q And this is notwithstanding the surface  
18 gas leakage that they described.

19 Do you agree with that?

20 A Yes. 14:43:52

21 Q To the degree that this update relates to  
22 the same release that we've been discussing on  
23 November 13th, 2015, would you agree that this  
24 indicates that they considered the events that day  
25 and considered -- and decided to keep pumping? 14:44:09

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1 Q -- this sentence states -- one moment. 14:45:40  
2 This sentence states, "At about 100 barrels away or  
3 so, the well began to blow out to surface despite  
4 having the choke at 100 percent open. A large  
5 column of gas, aerated mud, and rock formed a geyser 14:45:51  
6 around the wellhead."  
7 A Okay. I understand. I was confused.  
8 Q Okay. Thank you.  
9 So this next question relates to events  
10 that followed after that event. 14:46:08  
11 A Yes.  
12 Q And it indicates that the individual from  
13 DOGGR, who was involved in preparation of this  
14 update, Mr. Gustafson, met with Mr. Lane and  
15 Mr. Clayton with Boots & Coots and agreed to 14:46:25  
16 continue pumping.  
17 Do you agree with that?  
18 A Yes.  
19 Q In your view, does this indicate that  
20 there was likely not any attempt by SoCalGas to hide 14:46:42  
21 the events of that day?  
22 A That sounds like a non sequitur to me. I  
23 don't understand what they're talking about.  
24 What is this?  
25 Q You alleged previously that SoCalGas 14:47:05

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1 attempted to cover up the release of the geyser and 14:47:09  
2 the purposeful release that occurred -- the  
3 allegedly purposeful release that occurred on  
4 November 13th; is that correct?

5 A Right. 14:47:23

6 Q Given the involvement of DOGGR that day,  
7 as is apparent from this record, don't you agree  
8 that that indicates that there was not likely an  
9 attempted cover-up?

10 MR. GRUEN: I'll object as a misstatement 14:47:38  
11 of testimony. It doesn't go into -- it doesn't  
12 delve into the extent of testimony that supported  
13 the conclusion.

14 But she can answer the question.

15 THE WITNESS: Well, first of all, I still 14:47:51  
16 say that the two events recalled in the La Fevers  
17 MCR statement and the one in this update don't match  
18 up, and I can't explain why.

19 And so I have to assume there's a  
20 possibility that something else happened that's not 14:48:14  
21 documented in this update.

22 The cover-up concept or the thought there,  
23 I think, related more to notifying the public  
24 immediately as opposed to whoever was on-site  
25 actually having a visual about what was going on. 14:48:44

1                   Obviously if they were on-site, they knew                   14:48:48  
2                   what -- or could see what was happening, you would  
3                   think.

4                   BY MR. STODDARD:

5                   Q    Ms. Felts, you indicated, again, that the                   14:49:00  
6                   reason that you're uncertain that these are the same  
7                   events, because this document describes something  
8                   that occurred that you believe is different from  
9                   what you think is described in the MCR; is that a  
10                  fair characterization?   14:49:19

11                  A    Yes.

12                  Q    But you don't dispute that DOGGR personnel  
13                  were present that day, correct?

14                  A    They were there until 3:00 o'clock. A  
15                  little before 3:00 o'clock because it says at the                   14:49:36  
16                  bottom of that paragraph we were just reading, "We  
17                  arrived at command at 3:00 o'clock."

18                  Q    What do you understand "command" to mean  
19                  there?

20                  A    It's whatever building they were using                   14:49:52  
21                  that they called the command building. So it says  
22                  right before that, "We decided to leave the site  
23                  after this inspection and walk down to the command  
24                  area."

25                  So wherever that is on the -- on the map                   14:50:04

1 at Aliso Canyon. 14:50:08

2 Q Ms. Felts, do you see any other -- the MCR  
3 references an event. This document references a  
4 geyser event.

5 To the degree that these are two different 14:50:23  
6 events, don't you think there would be other  
7 evidence that there were two events that day?

8 A I think that's --

9 MR. GRUEN: Objection. Calls for  
10 speculation. 14:50:35

11 But she can answer.

12 THE WITNESS: I think that's exactly my  
13 point in the testimony, is that we don't actually  
14 see any other records that document what was  
15 documented in the MCR message. 14:50:49

16 You're asking me to assume that the person  
17 who wrote this update was there 100 percent of the  
18 time and reported everything that happened in this  
19 update, and yet there's no other documents -- not in  
20 the daily reports by SoCalGas or Boots & Coots or 14:51:09  
21 anything else that was written about the events of  
22 that day -- there's nothing else about the release  
23 that was described in the MCR.

24 BY MR. STODDARD:

25 Q In precisely the same way it's described 14:51:29

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1 in the MCR? 14:51:31

2 A Yes.

3 Q And again, there's significant differences  
4 between the MCR and this document, correct?

5 A I think so. 14:51:39

6 Q Including the fact that the MCR is a few  
7 sentences long and this document is several pages  
8 long.

9 Would you agree?

10 A Yes. 14:51:52

11 Q And this document contains considerably  
12 more detail.

13 Would you agree?

14 A It does. It's the detail that  
15 Mr. Gustafson decided to write -- 14:52:03

16 Q Based on his -- sorry. Go ahead.

17 A -- probably from his notes.

18 Q Based on his observations at the site that  
19 day, correct?

20 A Yes. 14:52:14

21 Q Isn't it more plausible that the MCR is  
22 simply not a complete verbatim description of the  
23 event than there are two different events that day  
24 that were not independently documented as two  
25 separate events? 14:52:32

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1 MR. GRUEN: Several objections here. 14:52:34

2 First of all, this is asked and answered  
3 multiple times at this point.

4 Secondly, the question about this being  
5 more plausible, comparing the MCR to others, is 14:52:42  
6 argumentative.

7 If you want to keep going down this line,  
8 she can answer, but we're going to note for the  
9 record the multiple asked-and-answered at this  
10 point. 14:52:56

11 THE WITNESS: Yeah, I can't answer. I  
12 don't know if it's more plausible or not. I know  
13 my -- what my conclusion was is that they're not the  
14 same.

15 BY MR. STODDARD: 14:53:15

16 Q Would you agree, Ms. Felts, that your  
17 testimony on this point is largely based on  
18 speculation as to the completeness and accuracy of  
19 that MCR description?

20 MR. GRUEN: Objection. Argumentative. 14:53:26  
21 She can answer.

22 THE WITNESS: My testimony is based on the  
23 actual text as it exists in the MCR, and there's --  
24 SoCalGas has not provided the transcripts, the  
25 recordings, or anything else that suggest that that 14:53:46

1 statement in the MCR is anything other than what it 14:53:51  
2 purports to be on the face of it.

3 MR. STODDARD: Okay. Let's move on.

4 If we can take a very brief five-minute  
5 break, I will be right back, if that's all right 14:54:18  
6 with you, Ms. Felts.

7 THE WITNESS: Sure.

8 MR. STODDARD: All right.

9 MR. GRUEN: Five minutes? You wanted five  
10 minutes, Jack? 14:54:28

11 MR. STODDARD: Five minutes.

12 MR. GRUEN: Okay.

13 THE VIDEO OPERATOR: We are now going off  
14 the record. The time is 2:54 p.m. This is the end  
15 of Media 3. 14:54:35

16 (Recess, 2:54 p.m. - 3:01 p.m.)

17 THE VIDEO OPERATOR: We are now back on  
18 the record. This is the start of Media 4. The time  
19 is 3:01 p.m.

20 MR. STODDARD: Thank you. 15:01:50

21 Q Ms. Felts, at the beginning of the  
22 deposition, we discussed a little bit about the  
23 process and who you had spoken with at SED, and you  
24 indicated that you hadn't spoken with anyone at SED  
25 in connection with preparation of your reply, 15:02:02

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1 sur-reply, and supplemental testimony. 15:02:05

2 May I ask why not?

3 A I don't know. I didn't ask to speak to  
4 anybody and nobody volunteered to speak to me.

5 MR. STODDARD: Okay. I'm going to 15:02:32  
6 introduce Exhibit No. 2-11. Are we prepared to do  
7 that, Pejman? I guess it will be 2-10, actually.  
8 And this is going to be SoCalGas's Data Request 21.

9 And as I did before, and I'll try to make  
10 this a little bit smoother this time, but we can 15:02:59  
11 introduce -- we're going to introduce four exhibits  
12 on this issue, which are going to be Exhibits 10,  
13 11, 12 and 13. And this is SoCalGas's Data Request  
14 21 and SED's responses, which includes an initial  
15 response, a supplement, and a second supplement. 15:03:24

16 We can walk through this when we have the  
17 documents marked.

18 THE WITNESS: Can you say what data  
19 request it was, again?

20 MR. STODDARD: 21. 15:03:46

21 THE WITNESS: Okay.

22 (Exhibit 2-10, Exhibit 2-11, Exhibit 2-12  
23 and Exhibit 2-13 were marked for  
24 identification and are attached hereto.)

25 /// 15:03:49

1 BY MR. STODDARD: 15:04:15

2 Q We're going to be looking at Question 29.

3 MR. GRUEN: Jack, I'm sorry. This is

4 Darryl. You want us to go to Exhibit 2-10 first?

5 MR. STODDARD: So this is Exhibit 2-10, 15:04:29

6 which is what I believe Pejman is currently --

7 currently marking.

8 MR. GRUEN: Okay.

9 MR. STODDARD: So you don't have it to go

10 to. I'm not sure what's in the file right now 15:04:40

11 because I'm not looking in the --

12 MR. GRUEN: It seems -- thank you. It

13 seems that Exhibit 2-10 has uploaded to the file I'm

14 seeing of "Marked Exhibits," the folder I'm seeing.

15 I don't know if others are seeing that as well. 15:04:56

16 THE WITNESS: I see it.

17 MR. GRUEN: Okay.

18 MR. STODDARD: Let's just give Pejman a

19 moment because he is, I think, marking four

20 documents. 15:05:14

21 MR. GRUEN: Yeah. I'm seeing Exhibit 2-11

22 and 2-12 now shown in the "Marked Exhibits" folder

23 as well.

24 BY MR. STODDARD:

25 Q Okay. I'm seeing the document now. Are 15:06:34

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1 you able to see the document, Ms. Felts? And this 15:06:35  
2 is marked as Exhibit 2-10.

3 A Yes.

4 Q And this is SoCalGas's 21st set of data  
5 requests to SED. 15:06:47

6 If we can scroll down to Question 29,  
7 please. Here we asked SED to "Identify all SED  
8 personnel who have worked on this proceeding,  
9 including SED's pre-formal investigation preceding  
10 this proceeding." 15:07:10

11 Do you see that question?

12 A Yes.

13 Q Do you recall assisting on this data  
14 response?

15 A I would not be able to respond to this. 15:07:19

16 Q Okay.

17 MR. GRUEN: Just a clarification. You're  
18 speaking -- when you say "data response," you're  
19 speaking specifically about Data Request --

20 MR. STODDARD: I'm sorry, Darryl. You're 15:07:33  
21 kind of -- the same thing is happening that happened  
22 before with your sound.

23 MR. GRUEN: I'll try again. Apologies for  
24 that. I'm not sure what else I can do.

25 Can you hear me any better now? 15:07:43

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1 MR. STODDARD: Yeah. You just got loud. 15:07:45

2 MR. GRUEN: Okay. So just a

3 clarification.

4 Reference to the term "data request" is

5 Data Request 21, Question 29. That was the only 15:07:57

6 reference to that question, right?

7 MR. STODDARD: Yes.

8 MR. GRUEN: Thank you.

9 BY MR. STODDARD:

10 Q All right. If we could now move on to 15:08:10

11 Exhibit 11, which is SED's initial response to

12 DR 21. And again, scroll down to question 29.

13 And Ms. Felts, if you see here, this is,

14 again, titled "Safety and Enforcement Division's

15 Response to Southern California Gas Company Data 15:08:32

16 Request No. 21."

17 Do you see that?

18 A Yes.

19 Q And you'll note that the original date of

20 request is December 11. 15:08:42

21 Do you see that?

22 A Yes.

23 Q And the response date is December 29,

24 2020.

25 Do you see that? 15:08:49

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1 this is SED's response to SoCalGas's Data Request 15:11:58  
2 No. 21.

3 MR. GRUEN: Jack, I'm sorry. I don't have  
4 Exhibit 2-13 in the shared exhibits folder, the  
5 "Marked Exhibits" folder. I'm not seeing it there. 15:12:12  
6 It could be I just didn't download it. But bear  
7 with me a second.

8 MR. STODDARD: Try refreshing it.

9 MR. GRUEN: Yeah, I'm doing that now. I  
10 see it. Okay. I'm there. Thank you. 15:12:21  
11 BY MR. STODDARD:

12 Q Okay. Scrolling down again to  
13 Question 29, and here SED identified additional  
14 individuals in response to this request.

15 Ms. Felts, can you count the total number 15:12:46  
16 of individuals identified here, please?

17 A You want me to count them?

18 Q Yes, please.

19 A 24, plus myself. So a total of 25.

20 Q 24 SED personnel excluding yourself. Were 15:13:22  
21 you aware of that, Ms. Felts?

22 A No. I have never seen this response.

23 Q You've never -- okay. You've never seen  
24 this response?

25 A I guess I didn't see the data request, 15:13:38

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1 either. 15:13:40

2 Q Okay. Thank you.

3 Are you surprised by that number?

4 A Well, you know, I don't know anything

5 about what they're doing in SED or what they did 15:13:54

6 before I arrived, so I'm not surprised. I'm not a

7 lawyer.

8 Q That's a significant number of individuals

9 to have involved in an investigation. Would you

10 agree? 15:14:13

11 MR. GRUEN: Objection. It's a

12 misstatement of the data request because it includes

13 both a pre-formal and preceding.

14 So to the extent that the term

15 "investigation" is covering the pre-formal, it's 15:14:29

16 also vague.

17 The witness can answer.

18 THE WITNESS: I don't have a comment on

19 that. I don't know whether it's normal or not. At

20 the Public Utilities Commission, they always hire me 15:14:52

21 as an expert witness, and I work with the attorneys,

22 not with SED.

23 BY MR. STODDARD:

24 Q And in the past when you've been engaged

25 as an expert in other PUC proceedings, you don't 15:15:03

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1 speak with anyone who would have knowledge of the 15:15:07  
2 matter independent of your research and review of  
3 documents; is that correct?

4 A It would be really rare. The only time it  
5 would happen is if -- if counsel told me they wanted 15:15:20  
6 me to talk with so-and-so, and they would set up a  
7 meeting.

8 Q If you had known prior to your testimony  
9 that there were 24 individuals who had been involved  
10 in some aspect of SED's investigation, including the 15:15:36  
11 pre-formal investigation, would you have asked  
12 Darryl or others at SED to speak with them regarding  
13 their knowledge?

14 A No.

15 Q Why not? 15:15:54

16 A I just -- you know, I'm hired to look at  
17 data and to provide technical expertise. And so  
18 what people in SED think is probably pretty much  
19 irrelevant to what I've been asked to do.

20 Q So in your view, what people in SED think 15:16:16  
21 on a matter such as the Aliso Canyon investigation  
22 is irrelevant to your allegations of violations on  
23 behalf of SED?

24 MR. GRUEN: Objection. Misstates  
25 testimony. She's just been talking about what she 15:16:31

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1 had been asked to do, not with regards to the 15:16:35  
2 allegation of violations on behalf of SED.  
3 She can answer the question.  
4 THE WITNESS: So the violations stem from  
5 Blade, not from anyone within SED, to my knowledge. 15:16:52  
6 BY MR. STODDARD:  
7 Q Ms. Felts, are you aware whether SED's  
8 investigation included inquiries related to well  
9 kill operations?  
10 MR. GRUEN: Objection. It's vague. 15:17:17  
11 Clarification. Maybe it's helpful. SED's  
12 investigation being the pre-formal investigation  
13 before the proceeding? I'm unclear. So it's a  
14 vague objection.  
15 BY MR. STODDARD: 15:17:32  
16 Q Ms. Felts, I'll restate it. That's okay.  
17 Ms. Felts, are you aware whether SED's  
18 pre-formal investigation included inquiry related to  
19 well kill operations?  
20 A What I know is what's reflected in 15:17:49  
21 SoCalGas's responses to data requests. And the data  
22 requests go back to the first one.  
23 And so I have access to all of the  
24 responses, all of the questions and the responses to  
25 those data requests. 15:18:08

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1           And it's my understanding that some of           15:18:11  
2       those data requests predated -- I mean, would have  
3       been pre -- what is the term -- pre-formal  
4       investigation.

5           So to the extent that they were asking for           15:18:24  
6       data and looking at data possibly, I don't know who  
7       was reviewing it, but I have seen the questions that  
8       were asked before I came on board and before  
9       testimony was published, and I've seen the responses  
10      to those questions, but they've been sometimes           15:18:46  
11      ongoing.

12           Q    It's more than that, too, Ms. Felts, isn't  
13      it?

14           You're also aware of the transcripts from  
15      examinations under oath that were conducted as part           15:19:00  
16      of SED's pre-formal investigation; isn't that  
17      correct?

18           A    Yes. I do have those.

19           Q    And those transcripts include inquiry and  
20      questioning related to well kill operations,           15:19:11  
21      correct?

22           A    Yes.

23           Q    And it also includes questioning related  
24      to SoCalGas's operations and maintenance practices;  
25      is that correct?           15:19:23

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1 Q And when was that? 15:21:09

2 A I believe it was the first case I worked  
3 on, which was the POPCO case.

4 Q Can you explain what was at issue in that  
5 case briefly? 15:21:28

6 A Gas -- gas treatment plant failed on  
7 start-up.

8 Q Failed on start-up?

9 A Yes.

10 Q Can you explain what that means? 15:21:44

11 A They were starting up a gas treatment  
12 plant for offshore gas, and during the startup, the  
13 plant -- the process failed and a large amount of  
14 gas that contained hydrogen sulfide was released to  
15 the pipeline system and then had to be evacuated to 15:22:07  
16 avoid having it go to people's homes.

17 Q And was this an enforcement proceeding for  
18 violations of law?

19 A I think it was -- if I remember right, I  
20 think it was a reasonableness hearing. A 15:22:28  
21 reasonableness proceeding.

22 Q Related to rate recovery of some sort?

23 A Yes.

24 Q And were you working for Cal Advocates or  
25 the PUC's SED or predecessor to SED? 15:22:42

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1           A    It would have, at the time -- subject to           15:22:51  
2    check, because this was a long time ago, I believe I  
3    was employed by the legal office who were  
4    representing ORA.

5           Q    Got it.   Okay.                                   15:23:12

6                   Ms. Felts, given the scope of the inquiry  
7    that you understand from the information that you've  
8    been provided related to the pre-formal  
9    investigation, don't you think it's likely that some  
10   of the 24 SED investigators that we discussed a few           15:23:30  
11   moments ago have information that's relevant to your  
12   testimony?

13                   MR. GRUEN:  Objection.  Calls for  
14   speculation.  I'm going to object as argumentative  
15   as well.   15:23:47

16                   THE WITNESS:  I just assumed that if  
17   counsel thinks that there's something that could be  
18   useful or helpful in my testimony that could be  
19   provided by someone in SED, that they would make  
20   that meeting happen.   15:24:08

21   BY MR. STODDARD:

22                   Q    Okay.  So then you rely on counsel as a  
23   filter for information that you might require?

24                   A    I don't know that I would call it a  
25   filter, but I am -- I respond to counsel, and so           15:24:19

1 they'll have to decide if they want me to talk to 15:24:28  
2 someone else in the commission.

3 Q And just to confirm, now that you  
4 understand that there are 24 additional individuals  
5 with -- potentially with knowledge that's relevant 15:24:47  
6 to your testimony and to the issues in this  
7 proceeding, do you expect that you'll be requesting  
8 that you'd like to speak with them?

9 A No.

10 MR. GRUEN: Objection. Misstates 15:24:58  
11 testimony. This is a mischaracterization. There's  
12 nothing in the record that shows that these  
13 individuals have knowledge or don't. Just the  
14 assertion even that they potentially have knowledge  
15 is not established in the record. 15:25:13

16 She can answer to the extent she's able.

17 THE WITNESS: I haven't really run across  
18 any issues that I think might be illuminated by  
19 talking to someone in SED.

20 BY MR. STODDARD: 15:25:38

21 Q Are you aware that some of the individuals  
22 previously named were present during and shortly  
23 after the leak?

24 MR. GRUEN: I'm going to object that this  
25 is a misstatement of testimony as well. Nothing in 15:25:53

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1 the record shows that they were -- named individuals 15:25:59  
2 were present during or shortly after the leak.

3 You're going to need to lay some more  
4 foundation if you want to go there, Jack. But she  
5 can answer if she's able. 15:26:11

6 THE WITNESS: I can't actually answer the  
7 question that you asked. I don't know.

8 BY MR. STODDARD:

9 Q Would you agree that if individuals that  
10 I've previously named, any of the individuals 15:26:28  
11 previously named, were present during the leak,  
12 would you view that as relevant to your testimony or  
13 indicating a likelihood that they would have  
14 knowledge relevant to your testimony?

15 MR. GRUEN: I'm going to object again. 15:26:51  
16 This calls for speculation, and it's a misstatement  
17 of testimony.

18 She can answer if she's able.

19 THE WITNESS: My testimony is based on  
20 Blade's investigation and on my own review of 15:27:12  
21 documentation that was provided by SoCalGas.

22 And so to the extent that I've already  
23 produced that testimony, and there are underlying  
24 exhibits that support my testimony, I don't really  
25 know why I would need to start an inquiry of anyone 15:27:32

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1 else regarding events that occurred. 15:27:39

2 BY MR. STODDARD:

3 Q Okay. Let's move on.

4 In your first deposition, Ms. Felts -- and

5 I can pull up the transcript if necessary. But if 15:27:56

6 not necessary, it will probably save us five

7 minutes.

8 In your first deposition, you noted that

9 you were not aware of an SED investigation report in

10 this proceeding; is that correct? 15:28:06

11 A I was not aware of what?

12 Q An SED investigation report.

13 MR. GRUEN: I'm going to object as vague.

14 I think we'd like to see the transcript so

15 that she can be directed to where she testified. We 15:28:22

16 would request that for the record.

17 MR. STODDARD: All right. We'll pull it

18 up. Give me a moment.

19 MR. GRUEN: Margaret, do you want to see

20 the version in "Marked Exhibits" so you have access 15:29:03

21 to the whole transcript? You can ask for that if

22 you'd like.

23 THE WITNESS: Say that again. I'm not

24 sure.

25 MR. GRUEN: Yeah. Sorry. Can you hear me 15:29:17

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1 Q I'll direct you to 9822 of the transcript. 15:30:16  
2 And the question stated was, "Did you review any  
3 draft SED reports related to findings of their  
4 preliminary investigation?"  
5 Your answer was, "What would that be?" 15:30:32  
6 And this goes on for a few pages. "Any  
7 documents that include findings, summaries of  
8 evidence of alleged violations."  
9 "Other than the draft filing, the draft  
10 open testimony?" you asked. 15:30:43  
11 Other than the draft opening testimony,  
12 your statement was no.  
13 A Okay. That's still my statement.  
14 Q Are you aware today of the existence of an  
15 SED investigation report that was prepared as part 15:31:08  
16 of the pre-formal investigation?  
17 MR. GRUEN: I'm going to object to that as  
18 vague and ambiguous as to the term "prepared as part  
19 of the SED pre-formal investigation."  
20 I'm also going to object to this assuming 15:31:26  
21 facts not in evidence. It assumes that there was an  
22 SED investigation report that was actually published  
23 for public consumption without laying any foundation  
24 for that.  
25 MR. STODDARD: This doesn't assume any of 15:31:47

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1 that. This is asking her whether she's aware of a 15:31:49  
2 report prepared by SED in connection with this  
3 pre-formal investigation.

4 MR. GRUEN: Then I'll object to the extent  
5 that it assumes the existence of a prepared -- that 15:31:59  
6 is a published SED report as part of the pre-formal  
7 investigation.

8 But she can answer to the extent she's  
9 able.

10 THE WITNESS: Okay. I'm not aware of any 15:32:16  
11 reports that were prepared other than the testimony  
12 that I reviewed and adopted.

13 BY MR. STODDARD:

14 Q Thank you.

15 Do you know who Mr. Kenneth Bruno is, 15:32:29  
16 Ms. Felts?

17 A I know the name, but I do not know him.

18 Q Are you aware that he was recently deposed  
19 in connection with the civil litigation related to  
20 Aliso Canyon? 15:32:48

21 A I know that -- I believe that Mr. Gruen  
22 told me that he was not available one day because he  
23 was attending that deposition.

24 Q Have you been provided with a transcript  
25 from that deposition? 15:33:08

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1 preparation of or my existing testimony. So to that 15:34:58  
2 extent, I don't think it's necessary that I review  
3 it.

4 Q To the degree that SED made findings or  
5 included preliminary analysis in a draft staff 15:35:13  
6 report that may bear on allegations in your  
7 testimony or conclusions in the Blade report, you  
8 don't believe that that would be relevant?

9 MR. GRUEN: I'm going to -- I have  
10 multiple objections to this one. 15:35:32

11 Okay. So for the record, the term  
12 "findings" is vague and ambiguous. It calls for  
13 speculation. The witness has already said she  
14 doesn't know about the report, and that it's not  
15 relevant to her testimony. I think -- and just for 15:35:49  
16 the record, I'm going to note a misstatement of  
17 testimony in there as well.

18 But she can answer to the extent -- one  
19 more. No, go ahead. That's it.

20 Do you need him to repeat that after all? 15:36:15  
21 I apologize. I may have inserted too much. Does  
22 the question need to be repeated?

23 THE WITNESS: Yeah. I don't remember what  
24 the question was.

25 /// 15:36:23

1 BY MR. STODDARD: 15:36:25

2 Q All right. One moment.

3 To the degree that SED made findings or  
4 included preliminary analysis in a draft staff  
5 report that may bear on allegations in your 15:36:32  
6 testimony or contradict conclusions in the Blade  
7 report, you don't believe that that would be  
8 relevant?

9 MR. GRUEN: Okay. So I'm going to note  
10 the objections. Vague and ambiguous, calls for 15:36:47  
11 speculation, misstatement of testimony. I'm going  
12 to add compound.

13 She can answer if she understands it.

14 THE WITNESS: I don't think that I need to  
15 see them, see any report that they generated. I'm 15:37:07  
16 not aware of a report. I'm assuming if there's  
17 something really contradictory to something that was  
18 put into my report, somebody would have said  
19 something by now.

20 BY MR. STODDARD: 15:37:28

21 Q You're assume that if there was something  
22 contradictory, they would inform you?

23 A I'm relying on people at the commission  
24 knowing the whole scope of what's going on at the  
25 commission. And it's not my responsibility to 15:37:41

1 police that. 15:37:44

2 Q Because if there were contradictory  
3 information, it should be disclosed and it should be  
4 known; would you agree?

5 MR. GRUEN: I'm going to object as vague 15:37:55  
6 and overly broad.

7 But she can answer.

8 THE WITNESS: I can think of all kinds of  
9 circumstances where different information is  
10 available from different parties and different 15:38:07  
11 circumstances.

12 So I -- I can't agree with you there.  
13 Just -- you know, you would have to present me with  
14 exact information and then ask me about it.

15 BY MR. STODDARD: 15:38:26

16 Q You've already withdrawn violations as we  
17 discussed before based on new information that you  
18 learned before your opening testimony, right?

19 A I withdrew those based on information that  
20 I found myself or based on my technological 15:38:38  
21 background.

22 So I -- you know, I didn't base it on  
23 something that was given to me from -- internally at  
24 the commission.

25 Q Or based on information provided by 15:38:54

1 SoCalGas? 15:38:56

2 THE REPORTER: I'm sorry, Counsel. You

3 cut out a little bit. Can you repeat that again?

4 THE WITNESS: Yes. Can you repeat?

5 MR. STODDARD: Who? 15:39:10

6 THE WITNESS: You.

7 THE REPORTER: You.

8 BY MR. STODDARD:

9 Q Okay. I said -- I'll have to repeat it.

10 And based on information you received from 15:39:15

11 SoCalGas, correct?

12 A Yes.

13 MR. STODDARD: All right. Let's move on.

14 Next I want to introduce SED's sur-reply

15 testimony at Chapter 1. 15:39:43

16 Pejman, this is Exhibit 2-15, I believe.

17 THE WITNESS: Was there a 2-14?

18 MR. STODDARD: I believe we got 2-14 --

19 no, you're right. It's 2-14.

20 Actually, we'll hold that one. 15:40:42

21 If we can move -- sorry. This is Exhibit

22 2-2 already introduced.

23 Q We're referring to -- if you refer to

24 existing Exhibit 2-02, Ms. Felts, and you turn to

25 page 9, or PDF page 11, this is your sur-reply 15:40:57

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1 testimony. 15:41:08

2 A Page 11?

3 Q Of the PDF. Yes.

4 And Pejman, if you can put this up on the

5 screen. 15:41:18

6 A Okay.

7 Q Do you see where it states, "Violation 61

8 to 72"? It's in the paragraph at line 15.

9 "Violation 61 to 72 were for failure to follow the

10 company's internal 1988 plan to check casings of 12 15:41:49

11 wells (other than SS-25) for metal loss, as

12 recommended by its own engineers. The 58 holes are

13 examples of locations in well SS-25 that experienced

14 corrosion before the failure."

15 Do you see that? 15:42:03

16 A I'm not where you are. So you're going to

17 have to --

18 Q Sorry. If you're looking at -- you're

19 looking at the document you have?

20 A I'm looking at the PDF. What page? I 15:42:15

21 thought I was on the page, but not what --

22 Q Page 11 of the PDF file.

23 A That's what I was looking at, and I didn't

24 see it.

25 MR. GRUEN: And for the record, at the 15:42:29

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1 bottom of the page, it shows page 9. 15:42:30

2 MR. STODDARD: So page 9 is the document

3 page, and the PDF file page is 11.

4 THE WITNESS: Okay. Sorry. I'm on the

5 wrong page then. Okay. 9, okay. All right. It 15:42:39

6 says "Corrosion from Groundwater" at the top?

7 BY MR. STODDARD:

8 Q I'm looking at the paragraph starting

9 "Violations 61 to 72 were for failure" --

10 A I see that. Okay. 15:42:55

11 Q -- "to follow the company's internal 1988

12 plan to check casings of 12 wells (other than SS-25)

13 for metal loss, as recommended by its own engineers.

14 The 58 holes are examples of locations in well SS-25

15 that experienced corrosion before the failure." 15:43:09

16 A Yes.

17 Q And those -- sorry.

18 A I see it.

19 Q Yeah. And those 58 holes there are in

20 reference to the surface casing, correct? 15:43:23

21 A I don't know. I don't think so.

22 Okay. So above there at line 11 it says,

23 "I understood from the Blade report that at least

24 some of the 58 holes were areas of corrosion."

25 So I think you're correct, the 58 holes 15:44:04

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1 refer to the surface casing, or actually it says it 15:44:08  
2 in the paragraph before that. Okay. I got it.

3 Q Okay.

4 A Okay. And your question?

5 MR. STODDARD: So I want to confirm that 15:44:23  
6 that was a reference to the surface casing, which  
7 you've now confirmed.

8 Next, if we can introduce Exhibit 2-14,  
9 this is a data request from SoCalGas, and this is  
10 Data Request 15. 15:44:35

11 (Exhibit 2-14 was marked for  
12 identification and is attached hereto.)

13 THE WITNESS: Okay. It's not up yet.

14 BY MR. STODDARD:

15 Q While we're waiting for the data request, 15:45:14  
16 Ms. Felts, is it your contention based on the  
17 language we've just reviewed from testimony that  
18 SoCalGas would have detected corrosion in the 58  
19 holes if it had conducted Vertilog in 1988 in  
20 accordance with the 1988 plan? 15:45:31

21 A No.

22 Q What is your contention here?

23 A You're going to have to show me "here"  
24 again.

25 Q Okay. Let's wait until -- we'll give 15:45:48

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1 Pejman a moment because he's marking an exhibit, and 15:45:53  
2 then we can refer back to your testimony. Although  
3 if you have it available to you in the file, you can  
4 manipulate it yourself as well.

5 A I have 14, Exhibit 14 now. Is that 15:46:04  
6 helpful, or do you want me to go back to testimony?

7 Q I think go back -- you can go back to your  
8 testimony so we can clarify your contention.

9 A Okay. And that was Exhibit --

10 Q Exhibit 2. 15:46:20

11 A And that was page 9.

12 Q Ms. Felts, do you need another moment to  
13 review your testimony here or are you ready to go?

14 A Can you read me Violation 73, what that --  
15 which one that is? 15:48:19

16 Q Read you Violation 73?

17 A Yeah. Maybe it's at the top here.

18 Q Ms. Felts, are you seeing a reference to  
19 73 in the Exhibit 2-02 that you were looking for  
20 clarification on? 15:50:31

21 A It's the end of the paragraph you were  
22 reading. It's on my page 10 or 11 on the PDF, line  
23 2. It's the last sentence in the paragraph that  
24 starts "Violation 61-72."

25 MR. STODDARD: Scroll down, please, 15:51:26

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1 Pejman. Further, to the next page. 15:51:30

2 BY MR. STODDARD:

3 Q SE 73 is failure to follow company's 1988

4 plan to check casing of well SS-25 for metal loss.

5 A Failure to follow the memo. Okay. 15:52:54

6 Q So do you want me to restate the original

7 question?

8 A Yes. Could you?

9 Q Ms. Felts, do you contend that -- is it

10 your contention that had SoCalGas performed Vertilog 15:53:16

11 inspections in connection with the 1988 plan,

12 SoCalGas would have detected corrosion on the 58 --

13 in connection with the 58 holes?

14 A I have to answer that no.

15 Q All right. And just to restate this last 15:53:41

16 sentence of your testimony, it states, "Those areas

17 of corrosion, the corrosion found in the 7-inch

18 production casing at and near the location of

19 failure, and SoCalGas' failure to inspect" -- please

20 scroll down -- "well SS-25 for metal loss as 15:53:56

21 recommended by its own engineers in 1988 are the

22 bases of Violation 73," correct?

23 A Yes.

24 Q And why -- can you please explain why it

25 is not your contention that had SoCalGas conducted 15:54:13

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1 Vertilog at that time, it would have discovered or 15:54:15  
2 detected corrosion in connection with the 58 holes  
3 described in your testimony above?

4 A Well, because the actual holes were mostly  
5 a result of pressure that caused corrosion that 15:54:34  
6 existed to turn into holes at the time of or right  
7 before the incident.

8 So this is saying that the Violation 73 --  
9 my intention was to say that if inspections had been  
10 done for metal loss as recommended by the engineers 15:55:03  
11 in the 1988 memos, whether they were done in '88 or  
12 between '88 and 2015, those types of inspections  
13 would identify areas of corrosion. And if they had  
14 been done on well SS-25, they should have detected  
15 the corrosion that ultimately resulted in those 15:55:40  
16 holes when they were put under pressure.

17 Q And again, those are holes on the surface  
18 casing, correct?

19 A Yes.

20 MR. STODDARD: Okay. If we can introduce 15:56:01  
21 SED's response -- sorry. Let's refer back to what  
22 you've already marked, Pejman, as Exhibit 2-14.

23 MR. GRUEN: I'm sorry. Just for the  
24 record, it looks like the rough transcript recorded  
25 the last word of that answer to be "under operator," 15:56:17

1 and I -- my understanding of the response was -- 15:56:22  
2 that the last word was "under pressure."  
3 THE REPORTER: It will be corrected in the  
4 final.  
5 MR. GRUEN: Understood. Thank you. 15:56:37  
6 THE WITNESS: Okay. And we're opening 14?  
7 BY MR. STODDARD:  
8 Q Yeah. And this is SoCalGas -- a data  
9 request from SoCalGas. The 15th set of data  
10 requests to the Safety and Enforcement Division. 15:56:51  
11 Do you see that?  
12 A Yes.  
13 Q And Question 5 --  
14 If you scroll down, Pejman.  
15 -- states -- it refers to the following 15:57:00  
16 statements in your sur-reply testimony, and it  
17 quotes the language we've just discussed on page 9.  
18 And it asks, in A, "Do you contend that had SoCalGas  
19 performed the Vertilog inspections in connection  
20 with the 1988 plan, SoCalGas would have detected the 15:57:16  
21 58 holes in the surface casing at SS-25?"  
22 Do you see that there?  
23 A Yes.  
24 Q And just to confirm, to summarize your  
25 prior response, your contention is yes, correct? 15:57:33

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1 holes. Yes. 15:58:59

2 MR. STODDARD: Okay. If we can mark

3 Exhibit 2-15, SED's response, Question 5.

4 (Exhibit 2-15 was marked for

5 identification and is attached hereto.) 15:59:40

6 BY MR. STODDARD:

7 Q Again, the statement is restated there.

8 It's A, and it requests that you state all facts and

9 produce all documents supporting your contention.

10 SED objects, and then SED quotes the Blade main 15:59:54

11 report stating that "The gas flowing through the

12 axial rupture on the 7-inch production casing caused

13 an increase in pressure on the

14 11-and-three-quarter-inch surface casing. This

15 caused several of the surface casing corroded 16:00:10

16 regions to fail, creating holes and thus providing a

17 pathway for gas to escape. Over 50 such holes

18 provided a pathway for the gas to surface."

19 Do you see that?

20 A Yes. 16:00:24

21 Q So this is a little different from the

22 answer you provided today, which is that had

23 SoCalGas conducted a Vertilog, it may have detected

24 corrosion that resulted in the 58 holes.

25 Would you agree? 16:00:37

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1           A    Well, I think you have to read that next           16:00:38  
2           section.  It says, "Blade Energy Partners also  
3           contends it's not possible to determine what an  
4           inspection of the SS-25 casing would have shown in  
5           1988, but it is possible that the corrosion was           16:00:59  
6           present and detectable and steps could have been  
7           taken to avoid the leak in 2015."

8                        So, I don't know, maybe you're  
9           misunderstanding what I'm saying, or we're not  
10          talking about the same thing.                       16:01:18

11           Q    Well, just to confirm, what you're saying  
12          is had SoCalGas conducted Vertilogs sometime in  
13          connection with the 1988 plan, it would have  
14          detected the corrosion and wall loss that resulted  
15          in the 58 holes.  I understand that to be your           16:01:34  
16          position.

17           A    I think the problem here is that when we  
18          say -- when you say "in connection with the '88  
19          plan," or if that's something that you're quoting  
20          from me, my idea there is that the '88 plan is           16:01:49  
21          something that continues into the future.  It wasn't  
22          necessarily -- it didn't necessarily have to be done  
23          in 1988 for the statement to be true.

24                        MR. STODDARD:  Okay.  Let's move on to  
25          SED's supplemental response to this request and mark           16:02:14

1 it as Exhibit 2-16. 16:02:16

2 (Exhibit 2-16 was marked for

3 identification and is attached hereto.)

4 THE WITNESS: 2-16?

5 BY MR. STODDARD: 16:02:25

6 Q Yes.

7 A That's the one we were just looking at,

8 right? Or no.

9 Q This is supplemental. So this is Safety

10 and Enforcement Division's supplemental -- hold 16:02:31

11 on -- supplemental response to Southern California

12 Gas Company's Data Request No. 15.

13 Do you see that there?

14 A I think I was just looking at -- reading

15 from this one. Okay. Where are we going on this 16:02:42

16 one?

17 Q Down to Question 5.

18 A Okay.

19 Q And SED -- hold on.

20 If you could scan up a little bit, please, 16:03:04

21 Pejman, just so we can confirm the question again.

22 So you can see here SED refers -- the

23 question as stated up there, "Do you contend that,

24 had SoCalGas performed Vertilog in connection with

25 the 1988 plan, SoCalGas would have detected the 58 16:03:19

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1 holes?" do you see that's the same question, 16:03:24

2 Ms. Felts?

3 A I see it.

4 Q Okay. And then the response to 5A

5 indicates that it's supplemental, and it states at 16:03:33

6 the bottom, "Ms. Felts is aware of no reason to

7 doubt Blade Energy Partners' contention at this

8 time. It's possible that SoCalGas could have

9 identified some or all of this corrosion had it

10 performed Vertilog inspections in connection with 16:03:52

11 the 1988 plan."

12 Do you see that there?

13 A Yes.

14 Q So just to clarify a statement you just

15 made, at least in this response, you were linking it 16:04:02

16 back to in connection with the 1988 plan. Those are

17 your words, are they not?

18 A That's the response that's here. So

19 again, in connection with '88 plan doesn't mean that

20 it had to have been done in 1988. 16:04:18

21 Q I see.

22 So in your view, it could have happened

23 any time between 1988 and 2015?

24 A Yes.

25 Q And then that would be relevant to the 16:04:30

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1 1988 plan? 16:04:35

2 A Well, of course. Because if you think  
3 about it, the 1988 memo said -- and I'm  
4 paraphrasing -- "You should do inspections on this  
5 list of wells." 16:04:48

6 And they did some of them. So that leaves  
7 basically an open -- open suggestion that the rest  
8 of them should be done. And so you'd have to assume  
9 that maybe sometime in the future, they would be  
10 done. 16:05:05

11 And that happened at SoCalGas. I've seen  
12 other memos where a recommendation was made in one  
13 year, and it was carried along and not actually  
14 performed until several years later.

15 So I -- so in connection with the '88 plan 16:05:24  
16 is, okay, it starts in 1988, and at some time in the  
17 future, the inspection should have been done.

18 And I think Blade probably is thinking  
19 along those lines, too.

20 Q Is it your opinion, Ms. Felts, that the 16:05:43  
21 Vertilog technology that existed around 1988 to 1990  
22 was capable of detecting corrosion or wall loss on  
23 the surface casing of an underground storage well?

24 A I think, based on what I know about  
25 Vertilog and the history of it, I believe at the 16:06:10

1 time, in 1988, that the -- the companies proposing 16:06:14  
2 Vertilog inspections believed that it could.

3 Q All right. Let's move on.

4 If we could introduce -- refer back to  
5 Exhibit 2-02, please. We're going to refer to -- 16:06:59  
6 this is SED's certified testimony again. We're  
7 going to refer to page 75 of the PDF. And this is  
8 at lines 11, 17. Stop there.

9 Ms. Felts, do you see where that states,  
10 "Violation 83 is for failure to prevent surface 16:07:41  
11 plumbing failures on SS-25 from enabling that well  
12 to be kept filled. As Blade discusses" --

13 A Wait. Wait. I'm not where you are.

14 Q I'm sorry.

15 A I'm on page 75. 16:07:58

16 Q It's page 75 of the PDF, page 11 of the  
17 document.

18 A Okay. Give me a minute. I'm on 11, but I  
19 don't see where you're reading from.

20 Q Yeah, one moment. Pejman can orient you 16:08:14  
21 back. If you can go back to the -- this is Chapter  
22 3 of the SED certified testimony.

23 A Okay.

24 Q And just to be clear, we're discussing  
25 Violation 83 here. 16:08:42

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1 A Okay. 16:08:43

2 Q And Violation 83, do you see where we are  
3 now? This is under Roman Section VI which is titled  
4 "Mr. Abel fails to argue against SED's Violation  
5 83." 16:08:55

6 A Yes, I'm there.

7 Q Okay. "Violation 83 is for failure to  
8 prevent surface plumbing failures on SS-25 from  
9 enabling that well to be kept filled. As Blade  
10 discusses, SoCalGas facilities at the surface of the 16:09:08  
11 well system failed, pumps went down and well kill  
12 efforts that might have been successful were  
13 discontinued because fluids could not be pumped.  
14 This problem on kill attempt 6 could have been  
15 averted by having backup capacity. Violation 83 16:09:27  
16 should stand."

17 Do you see that?

18 A Yes.

19 Q Do you recall that SoCalGas asked you  
20 about this sentence related to backup capacity in a 16:09:39  
21 data request?

22 A I think the data request asked about  
23 backup pump capacity. Is that correct?

24 Q Let's reference the data request.

25 Pejman, if we can introduce Exhibit 2-17, 16:10:05

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1 and this is Data Request 16. 16:10:07

2 (Exhibit 2-17 was marked for

3 identification and is attached hereto.)

4 THE WITNESS: Which exhibit are we on?

5 MR. GRUEN: I believe it's 2-17. Data 16:10:49

6 Request 16 is what I understood from Mr. Stoddard,

7 but I'll defer to him.

8 BY MR. STODDARD:

9 Q Sorry. Did you ask a question, Ms. Felts?

10 I missed it. I didn't hear. 16:11:01

11 A I was just asking which exhibit it was.

12 Q That's correct.

13 A I don't have a 17, so --

14 MR. GRUEN: Yeah, I haven't seen it

15 uploaded, either, in the "Marked Exhibits" folder 16:11:13

16 yet. I'm trying to refresh. Oh, here it is. It

17 seems it's just appeared in the "Marked Exhibits"

18 folder now.

19 THE WITNESS: Okay.

20 MR. STODDARD: I'll wait for it to be up 16:11:39

21 on the screen.

22 Pejman, are you able to put the document

23 up on the screen share? I don't mean to rush you if

24 you are. No worries.

25 MR. GRUEN: While we're at this, I think 16:13:17

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1 we've been at this since, I'll say, 12:45 Pacific. 16:13:19  
2 So I think we've been at it almost two and a half  
3 hours now. I wonder if it might be a good time,  
4 while you're getting the technology to work, to  
5 maybe take a short break. 16:13:36  
6 MR. STODDARD: That's fine. How long do  
7 you want?  
8 MR. GRUEN: Do you want to say ten  
9 minutes?  
10 MR. STODDARD: That works. 16:13:44  
11 MR. GRUEN: Okay.  
12 THE VIDEO OPERATOR: We are now going off  
13 the record. The time is 4:13 p.m. This is the end  
14 of Media 4.  
15 (Recess, 4:13 p.m. - 4:33 p.m.) 16:13:54  
16 THE VIDEO OPERATOR: We're now back on the  
17 record. The time is 4:33 p.m. This is the start of  
18 Media 5.  
19 BY MR. STODDARD:  
20 Q Ms. Felts, before the break, you recall 16:33:13  
21 that we were discussing your testimony regarding  
22 having backup capacity?  
23 A Yes.  
24 Q Do you need us to refer back to that, or  
25 do you recall that testimony? 16:33:27

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1 did talk to Darryl about the response. I don't know 16:35:05  
2 exactly the wording of the response, but I do recall  
3 that I proposed that we delete the last sentence  
4 because it's inaccurate.

5 Q And by "the last sentence," you're 16:35:27  
6 referring to on the screen here, the sentence that  
7 reads, "This problem on kill attempt 6 could have  
8 been averted by having backup capacity"?

9 A Yes.

10 Q That also might shortcut some of this. 16:35:40

11 Ms. Felts, you're aware that SoCalGas  
12 moved to compel a response related to discovery on  
13 this issue, and that in response to that motion to  
14 compel, SED withdrew this sentence; are you aware of  
15 that? 16:36:05

16 A I don't think I'm aware of the motion to  
17 compel.

18 MR. STODDARD: Okay. If we could quickly  
19 enter Exhibits 18 and 19, Pejman, just to quickly  
20 show what SED's initial supplemental response -- the 16:36:19  
21 supplemental response from SED.

22 (Exhibit 2-18 and Exhibit 2-19 were marked  
23 for identification and are attached hereto.)

24 BY MR. STODDARD:

25 Q So we're marking SED's initial response as 16:36:30

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1 Exhibit 2-18 for completeness. 16:36:34

2 If we could refer to the supplemental

3 response, Exhibit 2-19, and go down to Question 15.

4 A Okay.

5 Q And you'll see here, Ms. Felts, that 16:37:02

6 following some objections, it restates -- hold on --

7 "This problem on kill attempt 6 could have been

8 averted by having backup capacity."

9 And you reference two footnotes -- sorry.

10 If we refer down to B, "Please describe what you 16:37:26

11 mean by backup capacity," you state, "Subject to and

12 without waiver of this objection, backup capacity

13 refers to one or more redundant systems that support

14 the plumbing system that failed."

15 Do you see that? 16:37:41

16 A Yes.

17 Q That's a supplemental response that was

18 provided on this date?

19 A Um-hum. Okay.

20 MR. STODDARD: And then if we can enter 16:37:48

21 SED's response to SoCalGas's motion to compel as

22 Exhibit 2-20, Pejman.

23 (Exhibit 2-20 was marked for

24 identification and is attached hereto.)

25 /// 16:38:01

1 BY MR. STODDARD: 16:38:09

2 Q And scan down to -- do you see here the

3 sentence starting "After further review" on page --

4 sorry. I need to scroll down a little bit for the

5 page number. Page 27 of this document, page 31 of 16:38:41

6 the PDF. Do you see that, Ms. Felts?

7 A Just a minute.

8 Okay. I'm on 31.

9 Q And do you see the header that says --

10 it's Roman X -- "SED has amended its testimony to 16:39:10

11 address one question from SoCalGas's motion to

12 compel"?

13 A Yes.

14 Q And it states below, "After further

15 review, SED has informed SoCalGas that Ms. Felts is 16:39:24

16 deleting a single sentence and footnote that this

17 question asks about. Thus, in Ms. Felts' sur-reply

18 testimony, page 11, lines 20 through 21, Ms. Felts

19 is deleting the sentence that says, 'This problem on

20 kill attempt 6 could have been averted by having 16:39:40

21 backup capacity.'

22 Do you see that?

23 A Yes.

24 Q And it indicates you're also deleting

25 Footnote 62 and the reference in Footnote 62 to the 16:39:50

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1 Blade main report. 16:39:56

2 A Yes.

3 Q Previously you had -- it was your  
4 contention that the Blade -- that your statement on  
5 this issue was consistent with the Blade report; is 16:40:02  
6 that correct?

7 A Yes.

8 Q And why did you recommend striking this  
9 sentence?

10 A So I -- when I re-looked at the Blade 16:40:19  
11 report, it looked like I had maybe a bout of  
12 dyslexia and misread their statement. And then --  
13 and I had misread it, so that I thought that a pump  
14 had gone down.

15 So when the questions came up again, I 16:40:46  
16 looked at the data reports for Boots & Coots and  
17 SoCalGas and saw that it was a piping issue, not a  
18 pump. So, you know, my thought was that there could  
19 have been backup pump capacity, and that's why the  
20 sentence got in there in the first place. 16:41:06

21 And so I recommended that it just be  
22 removed.

23 Q Thank you for that explanation.

24 If you're removing that statement from  
25 this section, should you also be withdrawing 16:41:21

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1 Violation 83? 16:41:26

2 A You'll have to read Violation 83 to me.

3 Q Do you need us to refer back to your  
4 testimony?

5 A Can you just tell me the wording of 16:41:57  
6 Violation 83?

7 Q Sure. It's prevention of surface plumbing  
8 failures on SS-25 from enabling that well to be kept  
9 filled.

10 A So no, we wouldn't -- would not withdraw 16:42:08  
11 that one.

12 Q Why not?

13 A Because I think Blade's contention or  
14 observation is still accurate. I just misunderstood  
15 what components were involved in that. 16:42:27

16 Q So Ms. Felts, when you alleged the  
17 violation, it was based on an understanding of the  
18 facts that was not accurate?

19 A That's --

20 MR. GRUEN: I'm going to object as overly 16:42:43  
21 broad and misstating testimony. That's not entirely  
22 accurate as to what she's testified to.

23 She may answer.

24 THE WITNESS: The violation was still  
25 accurate. It's based on Blade's statement. What 16:42:58

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1 was not correct was my understanding that there was 16:43:01  
2 a pump involved, and there wasn't.

3 BY MR. STODDARD:

4 Q What's the conduct at issue here? What is  
5 SoCalGas's conduct that you would allege was not 16:43:15  
6 reasonable in that sentence?

7 A Okay. Now we're going to have to go back  
8 to testimony because without reviewing it, I can't  
9 answer you.

10 Q Okay. Let's refer back to -- give me a 16:43:27  
11 second. Sorry.

12 Ms. Felts, before we refer to testimony,  
13 and possibly in the interest of time, in case this  
14 is a shortcut, if you refer back to the language  
15 that we were discussing a moment ago, which is that 16:45:10  
16 this problem on kill attempt 6 could have been  
17 averted by having backup capacity, can you explain  
18 again what the problem was?

19 MR. GRUEN: I'm going to object to that  
20 question as vague. She's asked that the testimony 16:45:33  
21 be produced and we refer back to it.

22 THE WITNESS: Yeah. I'm going to have to  
23 look back at that, what we were just talking about.

24 MR. STODDARD: Okay. We will present it.  
25 One moment. 16:46:01

1 THE WITNESS: Okay. I think I can answer 16:46:36  
2 your question by looking at your Exhibit 19.  
3 BY MR. STODDARD:  
4 Q That's the supplemental response on this  
5 issue? 16:46:53  
6 A Yes. And I'm looking at --  
7 Q All right. If we can hold on one moment,  
8 please, while we put it up on the screen.  
9 A Okay.  
10 Q This is Exhibit 2-19, and that's on sub A 16:47:01  
11 and B. Is that where you're looking?  
12 A I'm looking at Question 14. Does that  
13 make sense? Or 15?  
14 Q It's Question 15.  
15 A 15, okay. And right under 15 it says, "As 16:47:41  
16 Blade discusses" -- do you see that? -- "SoCalGas  
17 facilities at the surface of the well system  
18 failed."  
19 Q Yep. So can you scroll up a little bit,  
20 Pejman, please? 16:48:13  
21 So what is your answer to this question?  
22 A So I think your question -- is your  
23 question still -- or your question was, what -- what  
24 was the problem? Is that your question?  
25 Q Yeah. If you want to answer that 16:48:32

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1 question, let's take that first, which is, when you 16:48:34  
2 say in your statement, "This problem on kill attempt  
3 6 could have been averted by having backup  
4 capacity," what was the problem you were referring  
5 to? 16:48:44

6 A So the problem is that surface -- this is  
7 in the preceding sentence -- that SoCalGas  
8 facilities at the surface of the well system failed.  
9 Pumps went down and well kill efforts that might  
10 have been successful were discontinued because 16:49:04  
11 fluids could not be pumped.

12 So deleting the last sentence, that would  
13 be the end of this statement.

14 Q Understood.

15 A Okay. And so this problem in the sentence 16:49:23  
16 that was deleted would relate to that SoCalGas  
17 facilities at the surface of the well system failed.

18 Q So then the failure of the facilities, and  
19 these are the surface plumbing facilities, is it  
20 still an objection -- a violation of 451? 16:49:46

21 MR. GRUEN: Objection. Calls for a legal  
22 conclusion.

23 She can answer.

24 THE WITNESS: I don't have the wording for  
25 the violation in front of me, but it would -- it 16:50:00

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1 would be if there were steps that could have been 16:50:05  
2 taken to prevent that from happening.  
3 BY MR. STODDARD:  
4 Q What steps could have been taken to  
5 prevent that from happening? 16:50:12  
6 A I'd have to go back and look at the Blade  
7 report to see what they thought should have been  
8 done, or my original testimony.  
9 Q The withdrawal of the statement regarding  
10 backup capacity would require you to go back and 16:50:29  
11 review the Blade report to identify additional facts  
12 that might support this violation?  
13 A No. No, I withdrew that last sentence.  
14 Is that what you're asking me, is withdrawing the  
15 one about the backup -- the pump? 16:50:45  
16 Q You withdrew the sentence that reads "This  
17 problem on kill attempt 6 could have been averted by  
18 having backup capacity."  
19 A Yes. And I withdrew that sentence because  
20 my thought was that they could have had a backup 16:51:01  
21 pump. So I withdrew that sentence because that was  
22 my intention with that sentence.  
23 Q And do you recall whether you identified  
24 any other things that could have been done to avert  
25 this problem? 16:51:19

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1           A    I can't tell you right now without going           16:51:26  
2   back and looking at my testimony.

3           Q    If you didn't identify any other actions  
4   that could have been taken to avert this problem,  
5   would you agree that this violation should be           16:51:40  
6   withdrawn?

7           MR. GRUEN:  I'm going to object as vague.  
8   It's an unspecified hypothetical.

9           I mean, if you want to identify the area  
10   of testimony where she can refer to and see what she       16:51:53  
11   was looking at, that's one thing.  But she's already  
12   told you she'd have to look at testimony, and now  
13   you're asking her to go further, yet still not  
14   providing the testimony.

15           So she can answer if she's able to, but           16:52:06  
16   she's indicated that she can't already without  
17   testimony, without referring to it.

18           THE WITNESS:  Not only without testimony,  
19   but I probably would have to go, once again, back to  
20   what Blade said on the violation.                       16:52:19

21           MR. STODDARD:  Darryl, for -- briefly, her  
22   objection about SED testimony was right around this  
23   line of questioning.  After that, she came back and  
24   answered it based on the exhibits we've put up here.  
25   In her most recent answers, she did not refer back       16:52:40

1 to her testimony. 16:52:43

2 I'll ask you not to instruct the witness

3 how to testify.

4 MR. GRUEN: Okay. I strongly object to

5 that. That is a mischaracterization of my 16:52:51

6 objection. I haven't provided any instructions to

7 the witness whatsoever. I'm objecting -- once

8 again, to restate for the record, the objection is

9 for vagueness, that you haven't provided the

10 testimony for her to review. 16:53:08

11 So would you like to provide it or not?

12 MR. STODDARD: We can put up the

13 testimony.

14 THE WITNESS: The testimony will have to

15 be in the main -- in the opening testimony. 16:53:22

16 MR. STODDARD: Okay. You'll need to give

17 us a moment.

18 Q Again, this relates to prevention of

19 surface plumbing failures on SS-25 from enabling

20 that well to be kept filled. It's at Violation 83 16:54:09

21 in Section No. 2B5.

22 Ms. Felts, do you want to take a moment to

23 review this testimony?

24 A Okay. Where is it? Did you put it up?

25 Q It's on the share screen. 16:54:39



1 when I was writing my other testimony. 16:58:07

2 But surface plumbing failures on SS-25 as  
3 stated in the paragraph we were just looking at  
4 resulted in instability in the system when they went  
5 to well kill 7. 16:58:23

6 So it's --

7 Q Were you -- sorry. You weren't done.

8 A That's okay. Going back to Blade, I  
9 believe Blade's intent in making the statement was  
10 that the plumbing system should have been repaired 16:58:40  
11 before going on to the next well kill event.

12 But I'm saying that without going back and  
13 rereading the main report or the supplemental  
14 reports by Blade, so I'd have to refresh my memory  
15 about that to give you a perfect answer. 16:59:02

16 Q Without refreshing your memory, or without  
17 consulting other material by Blade, the question is  
18 whether there's any conduct in your testimony that  
19 you would allege constitutes a violation of 451  
20 apart from the alleged failure to have backup 16:59:21  
21 capacity.

22 MR. GRUEN: Objection. Calls for a legal  
23 conclusion.

24 THE WITNESS: So the failure to have  
25 backup capacity is my statement, which we've removed 16:59:32

1 from the testimony. It doesn't -- it's not 16:59:38  
2 reflected in the violation.  
3 BY MR. STODDARD:  
4 Q Would you agree that the failures in the  
5 surface plumbing are a consequence, not an action? 16:59:50  
6 A Is the failure of the surface plumbing a  
7 consequence of --  
8 MR. GRUEN: I'm going to object as vague.  
9 BY MR. STODDARD:  
10 Q The violation as it's stated in No. 83 is 17:00:18  
11 "Prevention of surface plumbing failures on SS-25  
12 from enabling that well to be kept filled," correct?  
13 A Right. So that would be a prevention, not  
14 a failure.  
15 Q What would be a prevention? 17:00:37  
16 A The violation is failure to prevent the  
17 problem.  
18 Q Is that correct? Do you want to --  
19 Pejman, can you scroll back to the table?  
20 I believe the statement is "The prevention 17:00:54  
21 of surface plumbing failures from enabling that well  
22 to be kept filled."  
23 A Right. And --  
24 Q So --  
25 A Your question is -- 17:01:11

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1 MR. GRUEN: I'm going to object as 17:01:12  
2 misstating testimony. Just if I could note an  
3 objection for the record.

4 She's identified prevention, and the  
5 violation does indeed include prevention. The 17:01:24  
6 question was is it correct, so it's misstating --  
7 it's mischaracterizing whether she has, in fact,  
8 identified the violation and articulated correctly.

9 She can answer.

10 THE WITNESS: Okay. I'm not sure what I'm 17:01:42  
11 answering. The violation says, "Prevention of  
12 surface plumbing failures on SS-25 from enabling  
13 that well to be kept filled."

14 And that's a shortened version, obviously,  
15 of what statements were made by Blade. So I think 17:01:58  
16 this is a violation that stands even when I deleted  
17 an incorrect statement that I had added to  
18 testimony.

19 BY MR. STODDARD:

20 Q Again, can you explain the basis for this 17:02:16  
21 violation as you have it today?

22 MR. GRUEN: I'm going to object. Asked  
23 and answered multiple times at this point.

24 BY MR. STODDARD:

25 Q Okay. Do you disagree that you're not 17:02:27

1 able to provide a basis for this violation sitting 17:02:29  
2 here today, Ms. Felts?

3 MR. GRUEN: I'll restate the objection.  
4 Asked and answered. Now it's going into  
5 mischaracterizing when she has, in fact, provided 17:02:40  
6 the requested explanation multiple times, and now  
7 it's asserting she is not. That is a blatant  
8 misstatement of testimony and assumption of facts  
9 not in evidence.

10 THE WITNESS: I think the -- I think the 17:02:54  
11 testimony in the opening testimony adequately  
12 supports this violation, and I don't know what else  
13 you need.

14 BY MR. STODDARD:

15 Q Ms. Felts, can you identify the equipment 17:03:12  
16 that actually failed with specificity?

17 A Not sitting here. I could if I went and  
18 looked again at the documents that I looked at to  
19 answer that data response to the extent that they  
20 were itemized on data reports. 17:03:30

21 Q Ms. Felts, can you identify -- you just  
22 stated that you believed your testimony did support  
23 the violation notwithstanding the withdrawal of the  
24 statement regarding backup capacity.

25 Can you point us to where in your 17:03:52

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1 testimony you believe it provides an adequate basis 17:03:53  
2 to maintain this violation?

3 A Without having my whole testimony in front  
4 of me, it appears that this section that you've put  
5 up on the screen is the section in my opening 17:04:11  
6 testimony that addresses this violation.

7 It doesn't say anywhere in here "backup  
8 capacity."

9 Q You raise backup capacity in later  
10 testimony, correct? 17:04:32

11 A That was probably in a reply or sur-reply.

12 Q And it was based on a misunderstanding of  
13 the Blade report?

14 A It was, yes, based on my misreading of a  
15 word. 17:04:49

16 Q And at this point in time, you're not able  
17 to identify any particular actions SoCalGas could  
18 have taken to prevent this occurrence?

19 A Are you talking about the violation?

20 Q Yes, the surface plumbing failures that 17:05:07  
21 prevented the well from being kept filled.

22 MR. GRUEN: Objection. Asked and  
23 answered, and it's a misstatement. She's already  
24 answered that it's provided in testimony, the basis  
25 for the violation. This has been asked and answered 17:05:24

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1 in different ways multiple times. 17:05:25

2 MR. STODDARD: I'm just asking her to

3 specify the conduct, Darryl. I haven't gotten an

4 answer to that question. If you think I have,

5 please point me to the place in the transcript. 17:05:34

6 THE WITNESS: The concept of the

7 violation, as I understand it, is that acts should

8 have occurred to prevent the surface plumbing

9 failures from causing a problem with the well kill

10 attempt 7. 17:05:55

11 BY MR. STODDARD:

12 Q As you understand it, what are those acts?

13 A (Inaudible.)

14 THE REPORTER: I'm sorry?

15 BY MR. STODDARD: 17:06:12

16 Q I said as I understand it, what are those

17 acts?

18 A I don't have a specific act in mind.

19 Q So you're just speculating; is that

20 correct? 17:06:26

21 MR. GRUEN: I'm going to object. I'm

22 sorry, but she's identifying -- her answer is the

23 acts should have occurred to prevent the surface

24 plumbing failures from causing a problem with the

25 well kill -- with the well kill attempt. 17:06:40

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1 THE WITNESS: So I rely on, for this 17:06:47  
2 violation as well as all the rest of the violations,  
3 on Blade's analysis and their recommendations and  
4 their conclusions.

5 So, you know, I don't have to make up 17:07:05  
6 something. I'm just telling you that I'm relying on  
7 Blade here.

8 BY MR. STODDARD:

9 Q You don't know what that is, correct?

10 MR. GRUEN: Objection. Vague. 17:07:18

11 THE REPORTER: I'm sorry. If there was an  
12 answer, I didn't get it because there was some  
13 talking over each other.

14 THE WITNESS: I would have to go back and  
15 reread sections of the Blade report at this point to 17:07:32  
16 answer your question.

17 BY MR. STODDARD:

18 Q Okay. Let's move on.

19 In connection with sur-reply -- your  
20 Violation 331 identified in your sur-reply 17:07:54  
21 testimony, you referred to a Lawrence Berkeley  
22 National Lab document.

23 Do you recall that?

24 A Some modeling, yes.

25 MR. STODDARD: Pejman, can we introduce 17:08:14

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1 this as Exhibit 2-21, please? 17:08:16

2 (Exhibit 2-21 was marked for

3 identification and is attached hereto.)

4 BY MR. STODDARD:

5 Q All right. If you can please turn to -- 17:10:08

6 well, first, this is Exhibit 2-21. Again, this is

7 the sur-reply testimony of Margaret Felts related

8 specifically to Violation 331.

9 Do you see that?

10 A Yes. 17:10:22

11 Q Okay. If we can please turn to the PDF at

12 pages 18 and 19.

13 I can't see the page number down below,

14 Pejman. Thank you.

15 A Just a minute. 18? Page 16 on the 17:10:45

16 document?

17 Q That's correct.

18 A Okay.

19 Q You see here -- are you ready?

20 A Yes. 17:11:14

21 Q All right. Do you see where you state,

22 "Although SoCalGas has produced no reports regarding

23 geyser types of releases from SS-25 associated with

24 well kill attempts, I recently reviewed a technical

25 document in the Journal of Petroleum Science and 17:11:27

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1 Engineering, issue 161 (2018) pages 158 to 164 which 17:11:31  
2 was written by engineers from the Lawrence Berkeley  
3 National Laboratory. Apparently, some or all of the  
4 authors participated in the last SS-25 kill event in  
5 December 2015. In this study, failed kill events 17:11:49  
6 were modeled utilizing data from those events,  
7 resulting in a unique explanation for the failures  
8 and," -- if we can scroll down, Pejman --  
9 "especially, for the geysers, which apparently  
10 occurred more than once. In the words of this 17:12:07  
11 study" -- and this is a block quote in your  
12 testimony -- "The return to blow-out flow conditions  
13 occurs like the eruption of a geyser with strong  
14 oscillations in liquid flow through the casing  
15 failure...The liquid in the annulus [between the 17:12:23  
16 tubing and 7 inch casing] is quickly carried out of  
17 the well with the flowing gas in the form of a  
18 geyser like eruption."  
19 The next paragraph is your testimony  
20 again, not a quote. "This study explains that 17:12:39  
21 normal kill procedures could not kill the well  
22 because there were holes in the tubing from a safety  
23 valve that had been removed years before. Also,  
24 according to this study, when SoCalGas installed a  
25 plug just above those holes and perforated the 17:12:53

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1 tubing above the plug, the configuration was such 17:12:56  
2 that a column of kill fluid could not be created at  
3 reservoir depth. Therefore the flow of high  
4 pressure gas could not be overcome."

5 Do you see that? 17:13:11

6 A Yes.

7 Q Ms. Felts, is it your understanding that  
8 the LBNL study indicates that well SS-25 could not  
9 be killed by top kill after the SSSV was removed?

10 A What was the last part of your statement? 17:13:34

11 Q Is it your understanding that -- I'll  
12 repeat the question.

13 Is it your understanding that the Lawrence  
14 Berkeley technical document is saying that well  
15 SS-25 could not be killed by top kill after the 17:13:49  
16 subsurface safety valve was removed?

17 A I think that's what they were saying, yes.

18 Q Is that your contention?

19 A Based on the data that they presented in  
20 their report, I would agree that this -- it would be 17:14:15  
21 impossible to kill that well.

22 Q You agree that it would be impossible to  
23 kill the well if the -- after removal of the  
24 subsurface safety valve?

25 A Are you -- 17:14:42

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1 Q I'm trying to confirm what you just said 17:14:43  
2 because you gave me part of the answer.

3 A The -- "after" -- "after the removal of  
4 the subsurface safety valve" is troubling to me  
5 because that valve was gone back in 1980, maybe '81. 17:14:56  
6 So it's not like they went in and removed the valve  
7 any time recently.

8 Q Right. I'm asking whether -- in your  
9 testimony, again, you state that "This study  
10 explains that normal kill procedures could not kill 17:15:15  
11 the well, because there were holes in the tubing  
12 from a safety valve (SSV) that had been removed  
13 years before."

14 Are you referencing there the subsurface  
15 safety valve? 17:15:28

16 A Yes. The one that was -- the guts were  
17 removed from it.

18 Q And by "normal kill procedures," do you  
19 understand that to mean a top kill operation?

20 A Yes. 17:15:42

21 Q Okay. And you indicated that you would  
22 agree with the authors, agree that if the subsurface  
23 safety valve had been removed, the well would not be  
24 killable by a top kill operation; is that correct?

25 A Yes. 17:15:55

1 Q Okay. In the next statement, you indicate 17:16:02  
2 that "According to the study, when SoCalGas  
3 installed the plug just above those holes and  
4 perforated the tubing above the plug, the  
5 configuration was such that a column of kill fluid 17:16:16  
6 could not be created at reservoir depth."

7 Is this also indicating to you that the  
8 well could not be killed by top kill due to the  
9 described plug and perforations?

10 A It couldn't be killed with the 17:16:36  
11 configuration that -- the configuration of the well  
12 when they were trying to kill it in each attempt.

13 Q It couldn't be killed by top kill?

14 A Yes.

15 Q And what do you mean by "configuration"? 17:16:53

16 A The slots in the safety valve or the  
17 safety valve that was partially removed, plus a  
18 plug, plus perforations above the plug.

19 Q And when were those plugs and perforations  
20 put in place? 17:17:15

21 A November 13, 2015.

22 Q Okay. We can move on.

23 Give me a second. I'm just scanning to  
24 see if I can eliminate a few questions here.

25 Ms. Felts, you've also alleged violations 17:18:23

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1 related to record management. In particular, that 17:18:25  
2 SoCalGas's well records are not well organized.

3 Am I on mute? Are you able to hear me?

4 A Are you asking me a question?

5 Q Are you able to hear me? Yeah, I was just 17:18:47  
6 saying, prior to serving -- you've also alleged  
7 violations related to records management, in  
8 particular, that SoCalGas's well records were not  
9 well organized; is that correct?

10 A Yes. 17:19:04

11 Q Prior to serving your opening testimony,  
12 were you aware that SED personnel had reviewed  
13 SoCalGas's well files in connection with the  
14 incident?

15 A Was I aware if they had received well 17:19:22  
16 files?

17 Q Reviewed.

18 A Reviewed well files. No, I don't know  
19 what they reviewed.

20 MR. STODDARD: Okay. If we can refer to 17:19:30  
21 SoCalGas Data Request 24, Exhibit 22. Mark that as  
22 Exhibit 2-22, and SED response marked -- to  
23 SoCalGas, Data Request 24, which we'll mark as  
24 Exhibit 2-23.

25 MR. GRUEN: Jack, I'm sorry. You faded 17:19:52

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1 out on the identification. 17:19:54

2 MR. STODDARD: Thank you.

3 Pejman, we're going to mark SoCalGas Data

4 Request 24 as Exhibit 2-22, and SED response to

5 SoCalGas Data Response 24 as Exhibit 2-23. 17:20:10

6 MR. GRUEN: And Jack, just as you're

7 working on this, we may need to take another break.

8 So just flagging that in the next short while.

9 MR. STODDARD: Do you want to take it now,

10 and how long do you want? 17:20:58

11 MR. GRUEN: Margaret, do you want a break

12 now or do you want to address this next line of

13 questions?

14 MR. STODDARD: Actually, it might make

15 sense to take a break now as long as you're okay 17:21:12

16 with that. If we take, let's say, ten minutes, and

17 then we can get through the next line of questions,

18 and we'll probably have to conclude for the day

19 after that.

20 THE WITNESS: Okay. Yeah. Because I have 17:21:24

21 to contact my husband and let him know what's going

22 on.

23 THE VIDEO OPERATOR: We are now going off

24 record. The time is 5:21 p.m. This is the end of

25 Media 5. 17:21:38

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(Recess, 5:21 p.m. - 5:35 p.m.)

17:21:39

THE VIDEO OPERATOR: We are now back on  
the record. This is the start of Media 6. The time  
is 5:35 p.m.

And this deposition is now concluded for  
the day. The time is 5:35 p.m.

17:35:38

(TIME NOTED: 5:35 p.m.)

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I, MARGARET C. FELTS, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,  
2021, at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

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MARGARET C. FELTS, VOLUME II

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I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [ ] was [ ] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: March 2, 2021

*Carla Soares*

CARLA SOARES  
CSR No. 5908

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[answer - attempted]

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[benjamin - caret]

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[carla - communications]

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[communications - contrast]

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[conversation - data]

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[doggr's - events]

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[extracting - field]

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[geyser - gruen]

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[gruen - incident]

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[nguyen - oil]

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[oil - overstating]

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[preparing - pump]

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[subsequently - tell]

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[think - turn]

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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). )  
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VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
MARGARET C. FELTS  
Thursday, February 25, 2021  
Volume III

Reported by:  
CARLA SOARES  
CSR No. 5908  
Job No. 4479218  
Pages 548 - 618

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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). )  
----- )

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
MARGARET C. FELTS, Volume III, taken on behalf of  
Southern California Gas Company, beginning at  
10:08 a.m., and ending at 12:08 p.m., on Thursday,  
February 25, 2021, before CARLA SOARES, Certified  
Shorthand Reporter No. 5908.

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Brian Kielhack, Video Operator  
Jonathan Pearl, Veritext

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WITNESS

MARGARET C. FELTS

EXAMINATION

Volume III

BY MR. STODDARD

556

EXHIBITS

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Southern California Gas Company's  
Twenty-Fourth Set of Data Requests  
To the Safety and Enforcement Division

Exhibit 2-23

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Safety and Enforcement Division's  
Response to Southern California Gas  
Company's Data Request No. 24

Exhibit 2-24

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Deposition Transcript of Kenneth  
Bruno, dated 1-29-21

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INSTRUCTIONS NOT TO ANSWER

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Witness Location: Delta, Colorado

Thursday, February 25, 2021

10:08 a.m.

P R O C E E D I N G S

THE VIDEO OPERATOR: Good morning. We are going on the record at 10:08 a.m. on February 25th, 2021.

Please note that everything is being recorded, and unless you mute yourselves, it will be picked up on the video. 10:08:53

This is Media Unit 1 of the video-recorded deposition of Margaret C. Felts, taken by counsel for plaintiff in the matter of an investigation for the California Public Utilities Commission, filed in the Public Utilities Commission of the State of California, Case No. I19-06-016. 10:09:10

This deposition is being held remotely. My name is Brian Kielhack from the firm Veritext, and I'm the videographer. The court reporter is Carla Soares from the firm Veritext. 10:09:34

I am not authorized to administer an oath, I'm not related to any party in this action, nor am I financially interested in the outcome.

Counsel, at this time, will you please 10:09:51

1 state your appearance and whom you represent for the 10:09:54  
2 record. If there are any objections to this  
3 proceeding, please state them at the time of your  
4 appearance, beginning with the noticing attorney.

5 MR. STODDARD: Thank you. Jack Stoddard, 10:10:10  
6 with Morgan Lewis, for Southern California Gas  
7 Company.

8 MR. MOSHFEGH: Pejman Moshfegh, with  
9 Morgan Lewis, on behalf of Southern California Gas  
10 Company. 10:10:23

11 MR. GRUEN: Darryl Gruen, representing the  
12 California Public Utilities Commission's Safety and  
13 Enforcement Division.

14 MS. PURCHIA: Robyn Purchia, representing  
15 the California Public Utilities Commission's Safety 10:10:37  
16 and Enforcement Division.

17 MARGARET C. FELTS,  
18 having been administered an oath, was examined and  
19 testified as follows:

20 EXAMINATION (Continued) 10:10:41

21 BY MR. STODDARD:

22 Q Good morning, Ms. Felts.

23 A Good morning.

24 Q How are you today?

25 A I'm fine. 10:11:11

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1 Q I'm going to pick up where we left off 10:11:12  
2 yesterday. But before we do so, I'm just going to  
3 ask a few preliminary questions. I won't retread  
4 all of the admonitions that we went through  
5 yesterday. 10:11:21

6 But just preliminarily, what did you do to  
7 prepare for today's deposition?

8 A Nothing.

9 Q Did you speak with your counsel since we  
10 concluded yesterday's deposition? 10:11:36

11 A Yes.

12 Q For how long?

13 A About five minutes.

14 Q Did you review any documents?

15 A I looked at the Blade report briefly. 10:11:50

16 Q Ms. Felts, do you have anything with --  
17 are you with anybody in the room today?

18 A No.

19 Q You're by yourself?

20 A Yes. 10:12:06

21 Q Do you have anything in front of you that  
22 you would be reviewing or looking at during the  
23 deposition?

24 A No.

25 Q Do you have the handwritten notes you had 10:12:14

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1 yesterday? 10:12:16

2 A Yes.

3 Q Do you have a copy of your testimony with  
4 you?

5 A No. 10:12:20

6 Q Do you have your phone with you?

7 A Yes.

8 Q Would you please agree to put your phone  
9 down during the course of the deposition today?

10 A Yes. And I turned off the sound. 10:12:35

11 Q Okay. Is there any reason why you are not  
12 able to provide full, complete, and truthful  
13 testimony today?

14 A No.

15 Q Thank you. 10:12:52

16 Ms. Felts, when we concluded yesterday's  
17 deposition, we had briefly begun to talk about  
18 issues regarding review of well files.

19 I'm going to pick back up a little bit.  
20 And forgive me if I ask a few questions again that 10:13:06  
21 you may have -- that we got into yesterday, only  
22 because our line of questioning was interrupted, and  
23 so I want to make sure we have just a little bit of  
24 foundation.

25 A Okay. 10:13:16

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1 Q Initially in your testimony, you alleged 10:13:17  
2 violations related to SoCalGas's maintenance of well  
3 records and well files, correct?

4 A Yes.

5 Q In particular, you've alleged that 10:13:29  
6 SoCalGas's well records were not well organized,  
7 correct?

8 A Correct.

9 MR. GRUEN: I'm going to note an objection  
10 here for vagueness. And just -- if this is going 10:13:37  
11 down the line of asking about the witness's  
12 testimony, if SoCalGas would kindly furnish the  
13 testimony that have the questions that are related  
14 to the questions that you're going to ask about,  
15 we -- 10:13:58

16 MR. STODDARD: Mr. Gruen, it might -- I  
17 would request today that when you state objections  
18 for the record, do so concisely and briefly so that  
19 we can hopefully get through this more quickly.

20 And also, I'm entitled to ask the witness 10:14:10  
21 about her general recollection and knowledge of the  
22 violations she alleged. If we decide to, we may  
23 consult her testimony.

24 MR. GRUEN: I'll respond to that.

25 I think it is stated concisely. But we're 10:14:22

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1 noting for the record there's a pattern that 10:14:27  
2 SoCalGas has had since yesterday of asking questions  
3 prior to showing documents.

4 So what we're doing here is identifying  
5 vagueness and asking that SoCalGas furnish the 10:14:39  
6 document that's being asked about.

7 It's clear that you're asking about  
8 testimony. We're asking that you refer to it and  
9 provide it so that she can see it.

10 MR. STODDARD: We're noting for the record 10:14:55  
11 that we are asking SED's counsel to state its  
12 objections concisely and not state speaking  
13 objections that interrupt the deposition when we're  
14 asking perfectly appropriate questions.

15 And we will consult her testimony at the 10:15:09  
16 appropriate time if we decide to do so. We are  
17 currently asking for her general recollection to the  
18 degree that she's able to answer if she can. If she  
19 can't, she can't.

20 MR. GRUEN: And for the record, I'm going 10:15:20  
21 to object to mischaracterization of counsel for SED  
22 stating things not concisely.

23 Go ahead with your questions.

24 MR. STODDARD: Thank you. Let me consult  
25 the realtime so I can remember where we left off. 10:15:39

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1 Q The last question I asked, Ms. Felts, was, 10:16:00  
2 in particular, you've alleged that SoCalGas's well  
3 records were not well organized, correct?

4 A Yes.

5 Q Have you ever asked anyone at SED whether 10:16:12  
6 any SED personnel reviewed SoCalGas's well files  
7 during SED's pre-formal investigation?

8 MR. GRUEN: I'm going to object as asked  
9 and answered.

10 She can answer if she's able. 10:16:29

11 THE WITNESS: Did I ask someone else at  
12 SED? Is that what you're asking?

13 BY MR. STODDARD:

14 Q Have you ever asked SED whether any SED  
15 personnel reviewed SoCalGas's well files during 10:16:44  
16 SED's pre-formal investigation?

17 A No.

18 Q Are you aware whether SED personnel had  
19 reviewed SoCalGas's well files in connection with  
20 the pre-formal investigation? 10:16:59

21 A In one instance when I was reviewing  
22 records on the Diamond Drive, I saw that some well  
23 files had been aggregated into one PDF. And I  
24 didn't do that, so I'm assuming somebody in SED did  
25 that. 10:17:24

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1 MR. STODDARD: Thank you. 10:17:27

2 I'd like to introduce SoCalGas Data  
3 Request 24 and SED's response to the same data  
4 request as Exhibits 2-22 and 2-23.

5 And just for clarity, it appeared in 10:17:47

6 yesterday's realtime transcript that these exhibits  
7 had already been introduced, but they were not. We  
8 marked them that briefly and then we decided to  
9 break for the day, just for clarity of the

10 transcript. So if we need to clean that up on the 10:17:58

11 back end, we can. But again, we are introducing  
12 Exhibit 2-22 and Exhibit 2-23 at this time.

13 If you can bear with us for a moment, we  
14 can put them up on the screen.

15 (Exhibit 2-22 and Exhibit 2-23 were marked 10:18:20

16 for identification and are attached hereto.)

17 MR. MOSHFEGH: I'm sorry. The share  
18 feature has been disabled again. I don't know if  
19 Veritext can help with that.

20 MR. PEARL: Yeah, we can do that. Sorry 10:20:16

21 about that.

22 Brian or Carla, can you please --

23 THE VIDEO OPERATOR: One moment please.

24 I'll give you permission to do so. My apologies.

25 Is this Pejman talking? 10:20:27

1 MR. MOSHFEGH: That's correct. 10:20:31

2 THE VIDEO OPERATOR: Just want to make

3 sure.

4 MR. STODDARD: Pejman, has the file --

5 aside from the share, do you know whether Margaret 10:20:36

6 and Darryl should be able to access it now?

7 MR. MOSHFEGH: Yes. They have been

8 uploaded.

9 MR. STODDARD: Okay. Thank you.

10 MR. MOSHFEGH: And you might notice that 10:20:47

11 one of the documents was perhaps uploaded twice, and

12 one of them does not include an exhibit stamp. So

13 we can focus on the one that does have the exhibit

14 stamp. That's what I will be showing.

15 MR. GRUEN: And just for me, I'm still 10:21:10

16 refreshing the exhibits folder. I haven't been able

17 to access either of the two exhibits, either 2-22 or

18 2-23, yet. I'm continuing to refresh, however.

19 MR. STODDARD: It's going to be

20 interesting to see how all this goes at our 10:21:31

21 evidentiary hearings.

22 MR. GRUEN: I know what you mean. I was

23 thinking about that, too.

24 MR. MOSHFEGH: Mr. Gruen, the exhibits

25 will be in the folder for today's deposition. So if 10:21:42

1 you're looking in the prior folder with the exhibits 10:21:49  
2 from yesterday, they will not appear there.

3 MR. GRUEN: I see. Thank you. That's  
4 helpful. Thank you. Bear with me a moment. I'm  
5 switching folders. 10:22:05

6 THE VIDEO OPERATOR: Are you able to share  
7 your screen now?

8 MR. MOSHFEGH: I am not.

9 MR. PEARL: Brian, do you need help?

10 THE VIDEO OPERATOR: I actually do. 10:22:25

11 MR. PEARL: To the right of the share  
12 screen is a little caret pointing up. Do you see  
13 that?

14 MR. MOSHFEGH: Yes.

15 MR. PEARL: Click on that, and it should 10:22:31  
16 allow multiple users.

17 THE VIDEO OPERATOR: There it is.  
18 Perfect.

19 MR. PEARL: Try now, Pejman.

20 THE VIDEO OPERATOR: That should be good 10:23:12  
21 to go now.

22 MR. MOSHFEGH: There we go.

23 MR. STODDARD: Thank you.

24 Q This is the Exhibit marked as Exhibit 22,  
25 Ms. Felts. Do you see where it states there that 10:23:28

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1 this is Southern California Gas Company's 24th set 10:23:31  
2 of data requests to the Safety and Enforcement  
3 Division?

4 A Yes.

5 Q Do you recognize this document? 10:23:41

6 A I know what it is, but --

7 Q If we can scroll down to Question 4,  
8 please. Question 4 states, "Admit that in 2017 SED  
9 personnel reviewed SoCalGas's well files in  
10 connection with the incident." 10:23:59

11 Do you see that?

12 A Yes.

13 MR. STODDARD: Thank you.

14 Pejman, please move to Exhibit 2-23.

15 Q Ms. Felts, do you see the enforcement 10:24:16  
16 division's response to Southern California Gas  
17 Company's Data Request No. 24?

18 A The question -- okay.

19 Q Do you see, Ms. Felts, that it is dated  
20 December -- the date of the original request was 10:24:47  
21 December 17th, 2020, and that the date of SED's  
22 response is January 6, 2021?

23 A Yes.

24 Q And this is marked as Exhibit 2-23.

25 Please move down to Question 4. 10:25:02

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1 very long records review as part of SED's 10:26:15  
2 investigation?

3 A Am I surprised?

4 Q Yes.

5 A No. I think there was plenty of time that 10:26:26  
6 passed from the time of the incident until the time  
7 testimony was produced that somebody should have  
8 been looking at something.

9 MR. STODDARD: Pejman, can we please  
10 introduce Exhibit 24, 2-24? 10:26:45

11 (Exhibit 2-24 was marked for  
12 identification and is attached hereto.)

13 MR. STODDARD: Thank you.

14 Q Ms. Felts, I know you're accessing the  
15 records as well in your independent folder. Are you 10:27:35  
16 able to see the exhibit marked as 2-24 yet?

17 A Yes. I have it open.

18 Q Okay. And you see that this is a  
19 deposition transcript --

20 Can you scroll up, please, a little bit, 10:27:48  
21 Pejman?

22 -- dated January 29th, 2021, in JCCP  
23 No. 4861?

24 A Okay.

25 MR. STODDARD: Please scroll down a little 10:28:02

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1 bit, Pejman. 10:28:06

2 Q And it says here this is the remote

3 videotaped deposition of Kenneth Bruno.

4 Do you see that?

5 A Yes. 10:28:12

6 Q Thank you.

7 Pejman, please scroll down to page 173,

8 lines 15 to 16.

9 A Is it E page 173?

10 Q No. Good question. Well, it might be the 10:28:38

11 same. It's transcript page.

12 A Okay.

13 Q But I can confirm when I get there.

14 A That's okay. I have it. And it is the

15 same. 10:28:53

16 Q Okay. Here you'll see that Mr. Bruno was

17 answering questions from counsel related to a record

18 review.

19 Do you see on line 11 there where counsel

20 asks, "Who on your team reviewed those records or 10:29:09

21 who from SED reviewed those records"?

22 A Yes.

23 Q And Mr. Bruno answers, "Mr. Holter was one

24 of the professional engineers. There were others

25 that worked on records review. Records review was a 10:29:20

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1 very long sort of part of the SED investigation." 10:29:23

2 Do you see that?

3 A Yes.

4 Q And then counsel asked whether he could

5 identify anyone other than Mr. Holter. And counsel 10:29:31

6 for PUC stated an objection, and the witness

7 answered, "Sure. There was an engineer who was with

8 us, Richard Yidem." "Phonetic" is in brackets there.

9 "He worked under Mr. Holter."

10 Do you see that? 10:29:50

11 A Yes.

12 Q "And there was a Yen -- I believe his name

13 was Yen Ken, and he worked under Mr. Holter."

14 A Okay.

15 Q You didn't speak with any of these 10:30:04

16 individuals regarding their records review work, did

17 you?

18 A No.

19 Q Are you aware that after Mr. Bruno's

20 deposition, SED updated its response to Data Request 10:30:22

21 24, which we discussed above, to admit that in 2017,

22 SED personnel reviewed SoCalGas's well files in

23 connection with the incident?

24 A No.

25 MR. GRUEN: Object to that as vague and 10:30:42

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1 misstating testimony. 10:30:45

2 MR. STODDARD: Okay. Let's introduce the

3 exhibit. Pejman, please introduce Exhibit 2-25,

4 which is SED's updated supplemental response to Data

5 Request 24. 10:30:59

6 (Exhibit 2-25 was marked for

7 identification and is attached hereto.)

8 BY MR. STODDARD:

9 Q I'm now seeing the exhibit. Ms. Felts, do

10 you have access to the exhibit in your folder? 10:32:08

11 A Yes. I have it open.

12 Q Thank you.

13 You'll see that this is titled "Safety and

14 Enforcement Division's Supplemental Response to

15 Southern California Gas Company's Data Request 10:32:17

16 No. 24."

17 Do you see that?

18 A Yes.

19 Q Dated February 19th, 2021.

20 A Yes. 10:32:37

21 Q It appears the text in blue is

22 supplemental language.

23 Do you see that?

24 A Okay.

25 Q This is marked Exhibit 2-25. 10:32:42

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1                   Please scroll down to the response to                   10:32:45  
2                   Question 4, Pejman.

3                   Again, this question is "Admit that in  
4                   2017 SED personnel reviewed SoCalGas's well files in  
5                   connection with the incident."                   10:33:01

6                   Initially SED objected to this question.  
7                   SED's supplement provided here is that "On  
8                   February 19, 2021, SED supplements its response to  
9                   admit that in 2017, SED personnel reviewed  
10                  SoCalGas's well files in connection with the                  10:33:20  
11                  incident."

12                  Do you see that?

13                  A    Yes.

14                  Q    Thank you.

15                  Do you know who any of the individuals                  10:33:41  
16                  are -- I understand you haven't spoken to them -- do  
17                  you know who Richard Yidem, Yen Ken, or -- Yen Ken  
18                  are?

19                  A    No.

20                  MR. STODDARD:  Pejman, can you please                  10:34:09  
21                  bring us back to Exhibit 2-13, which was introduced  
22                  yesterday?

23                  And this is SED's data response to  
24                  SoCalGas Data Request 21.  Please scroll down to  
25                  Question 29.    10:34:43

1 Q Ms. Felts, do you see either individual in 10:34:54  
2 this list of individuals at SED identified here,  
3 Richard Yidem or Yen Ken?

4 A No.

5 Q Do you see anybody named Richard in that 10:35:27  
6 list?

7 A No.

8 MR. STODDARD: Pejman, please switch back  
9 to Exhibit 25.

10 Q Referring to Question No. 9, Ms. Felts, do 10:35:58  
11 you see this question which states, "Identify all  
12 SED personnel who reported to or were under the  
13 direct supervision of Mr. Randy Holter between  
14 October 23, 2015, and the commencement of the  
15 above-captioned proceeding"? 10:36:19

16 A Yes.

17 MR. STODDARD: Scroll down, please.

18 Q And do you see in the blue text SED's  
19 supplemental response here, "On February 19th, 2021,  
20 SED supplements its response to add the following: 10:36:35  
21 No SED personnel reported to or were under the  
22 direct supervision of Mr. Holter during the  
23 specified time"?

24 A Yes.

25 Q Would you agree that this response appears 10:36:50

1 to contradict the testimony provided by SED's former 10:36:52  
2 program manager, Ken Bruno?

3 MR. GRUEN: I'm going to object as  
4 misstating the testimony. It's misstating the  
5 testimony. 10:37:05

6 I'm also going to object as lacking  
7 foundation. The witness has -- the question is  
8 premised on the assumption that the witness  
9 recognizes the deposition transcript of Mr. Bruno.  
10 The foundation hasn't been laid for that. 10:37:40

11 THE WITNESS: So are you waiting for me to  
12 answer a question?

13 BY MR. STODDARD:

14 Q Yes.

15 A Is there a discrepancy between the two? 10:37:50

16 Q Yes.

17 A Is that the question? Well, there appears  
18 to be. I'm not surprised.

19 Q Why are you not surprised?

20 A I think the depo represents somebody's 10:38:03  
21 memory, and I think the response to the data request  
22 probably represents a little bit of research into  
23 fact.

24 I wasn't involved in either, so it's all  
25 supposition. 10:38:21

1 Q You weren't involved in the preparation of 10:38:22  
2 the data response?  
3 A No.  
4 Q Do you recall reviewing the data request  
5 when it came in? 10:38:30  
6 A No.  
7 Q Do you recall reviewing the data response  
8 before it went out?  
9 A I do not.  
10 Q Do you think Mr. Bruno's recollection is 10:38:41  
11 likely mistaken?  
12 MR. GRUEN: Objection. Calls for  
13 speculation, lacks foundation.  
14 THE WITNESS: Yes. I agree with my  
15 counsel. It's just a guess. 10:38:52  
16 BY MR. STODDARD:  
17 Q You're speculating?  
18 A Yes.  
19 Q Okay. Thank you. Let's move on.  
20 Ms. Felts, are you aware of gas system 10:39:12  
21 safety plans submitted by gas utilities to the  
22 Public Utilities Commission?  
23 A Yes.  
24 Q Please describe what you know about them.  
25 A Only that I have seen gas safety plans 10:39:29

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1 that were submitted in documents for utilities in 10:39:33  
2 cases where I've worked.

3 Q Did you -- I'm sorry. I couldn't hear the  
4 last words.

5 A In cases that I've worked on. 10:39:51

6 Q Okay. So you've reviewed gas system  
7 safety plans in other cases that you've worked on?

8 A Yes.

9 Q Have you reviewed any gas system safety  
10 plans in connection with this proceeding? 10:40:01

11 A I believe I've seen some, but I don't  
12 think I have spent any time looking at them.

13 Q Okay. Can you recall the other  
14 proceedings that you looked at gas safety plans in?

15 A Do you want me to list some? 10:40:27

16 Q Yes, please.

17 A I don't know that I could give all of  
18 them. But the POPCO case, Mojave, Helms Power  
19 Plant, San Bruno. I'm sure there were others. You  
20 can probably look on my resume and see them all. 10:40:57

21 Q How would you describe the purpose and  
22 scope of those plans?

23 A Without looking at what's required to be  
24 in them or looking at the plans, I can't -- I can't  
25 tell you right offhand. 10:41:14

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1 MR. STODDARD: Okay. Please introduce 10:41:23  
2 Exhibit 2-26, Pejman. This is an April 24th e-mail.  
3 (Exhibit 2-26 was marked for  
4 identification and is attached hereto.)  
5 BY MR. STODDARD: 10:42:14  
6 Q Ms. Felts, can you see the document?  
7 A I see it.  
8 Q You'll see that this is an e-mail which  
9 states -- which says Gallegos, Rachel, at the top,  
10 but it is addressed from Mr. Gruen to you, and that 10:42:23  
11 it's dated April 24th, 2020, correct?  
12 MR. GRUEN: I'm going to object as  
13 misstating. It looks like -- perhaps I  
14 misunderstood, but it looks like it's from Ms. Felts  
15 to Darryl Gruen. I think you said it the other way 10:42:39  
16 around, if I got it right.  
17 MR. STODDARD: The top line e-mail I'm  
18 looking at is -- states it's from Darryl Gruen to  
19 Margaret Felts. The e-mail says, "Thanks."  
20 MR. GRUEN: Got it. I looked at the other 10:42:55  
21 part -- okay. I'll withdraw the objection.  
22 BY MR. STODDARD:  
23 Q Ms. Felts, do you see that?  
24 A Yes.  
25 Q And this is in response to an e-mail from 10:43:04

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1 you sent earlier that same day to Mr. Gruen, and the 10:43:05  
2 subject line is "Gas Safety Plans."  
3 Do you see that?  
4 A Yes.  
5 Q Do you recognize this e-mail? 10:43:15  
6 A Not specifically.  
7 Q Do you recall writing the e-mail on the  
8 bottom of this chain?  
9 A Not specifically, but I'm sure I did since  
10 it came from me. 10:43:31  
11 Q Do you want to take a moment to review it  
12 or have you had adequate time?  
13 A If you had the attachments, that would be  
14 helpful. Because just looking at the e-mail doesn't  
15 tell me much. 10:43:45  
16 Q We'll get to that in one second.  
17 Your e-mail states, "Darryl, see attached.  
18 Both found with a simple search on the CPUC website.  
19 For CPUC Gas Safety Plan, see pages 22 and 28. For  
20 2013 SoCalGas Gas Safety Plan, see pages 102, 116, 10:44:03  
21 and 124. Also can search on storage. But some  
22 'storage' refers to underground storage tanks and  
23 possibly storage in pipelines."  
24 Do you see that?  
25 A Yes. 10:44:17

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1 Q Do you recall, based on this document, 10:44:20  
2 why -- what those page references were for?  
3 A No idea.  
4 Q Were they likely references to areas where  
5 those documents reference storage or gas storage 10:44:34  
6 operations?  
7 MR. GRUEN: Objection. Calls for  
8 speculation.  
9 THE WITNESS: I really just would have to  
10 see the attachments to maybe remember what was going 10:44:44  
11 on. I think this is probably a response to some  
12 question, but I don't know.  
13 MR. STODDARD: Okay. Pejman, please  
14 introduce Exhibit 2-27. This is the CPUC gas safety  
15 plan. 10:45:29  
16 (Exhibit 2-27 was marked for  
17 identification and is attached hereto.)  
18 THE WITNESS: Okay. I don't have it yet.  
19 BY MR. STODDARD:  
20 Q I'm just -- sorry. I was just identifying 10:45:33  
21 it to make sure Pejman was clear.  
22 A Okay. Okay. Now I have it. Okay.  
23 Q Ms. Felts, you can see the document?  
24 A Yes.  
25 Q You see at the top it says, "CPUC Gas 10:46:00

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1 Safety Plan"? 10:46:02

2 A Yes.

3 Q Do you recognize this document?

4 A Not specifically.

5 Q It's a multipage document. Do you want to 10:46:13

6 take a moment -- if you have access to it in your

7 folder, do you want to take a moment to scroll

8 through it quickly just to see if any part of it

9 rings a bell?

10 A Okay. 10:46:23

11 Q Let me know when you've had a chance to

12 scroll through it.

13 MR. GRUEN: So Jack, this is Darryl. I'm

14 noting for the record this is a 65-page document.

15 You're asking her to review the entirety of it now? 10:47:08

16 MR. STODDARD: No, I'm not asking her to

17 read the entirety of it. I'm just asking her to

18 scroll through it to see if it's something that she

19 recognizes, and if after having scrolled through it

20 she doesn't think she recognizes it, she can say so. 10:47:20

21 MR. GRUEN: Understood. Thank you.

22 MR. STODDARD: The reason I was asking,

23 Darryl, is because I wasn't sure, looking at this

24 front page alone, given that the format and the

25 content of the document on the front page is 10:47:35

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1 different from the rest, that Ms. Felts may not, you 10:47:36  
2 know, recognize this page but may recognize others.

3 MR. GRUEN: Understood.

4 THE WITNESS: Okay. I -- you know, it  
5 just looks like a normal filing, but nothing stands 10:47:57  
6 out to me in the document.

7 BY MR. STODDARD:

8 Q So you don't recognize the document?

9 A I recognize the format. I just don't -- I  
10 don't remember -- I don't remember why I was looking 10:48:11  
11 at it or looked it up.

12 MR. STODDARD: Pejman, can we introduce --  
13 and we'll need to reference back to this in a minute  
14 as well as the e-mail we had a moment ago, so keep  
15 those handy -- but can we please introduce Data 10:48:30  
16 Request 9 -- or rather SED's data response to Data  
17 Request 9?

18 (Exhibit 2-28 was marked for  
19 identification and is attached hereto.)

20 MR. STODDARD: Pejman, we can see your 10:48:56  
21 screen, just so you're aware.

22 Q This might take a second.

23 A I have 2-27 up. Is this another --

24 Q 2-27 was the document we were just  
25 discussing, correct? 10:49:49

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1           A    It was?  Okay.  Okay.  I have the ninth           10:49:52  
2 set of data requests up.

3           Q    We'll wait for a moment for the screen  
4 share, Ms. Felts, if that's okay, but you can review  
5 it at this time to familiarize yourself with the           10:50:33  
6 document.

7                    I want to direct you to Questions 10  
8 through 12 in a moment, but first we'll just mark  
9 the exhibit.

10                   (Exhibit 2-29 and Exhibit 2-30 were marked           10:53:43  
11 for identification and are attached hereto.)

12           MR. STODDARD:  Pejman, if you can scroll  
13 up to the top.

14           Q    You'll see that this is titled "Safety  
15 Enforcement Division's Response to Southern           10:53:49  
16 California Gas Company's Ninth Set of Data Requests  
17 Questions 10 through 12."

18                    Do you see that, Ms. Felts?

19           A    Yes.

20           Q    And it's dated May 15th, 2020.           10:54:00

21                    Do you see that?

22           A    Yes.

23           Q    Thank you.  Do you see Question 10 which  
24 states, "Produce all documents related to SED's  
25 review of SoCalGas's 2012 Gas Safety Plan"?           10:54:15

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1 Q Again, Ms. Felts, to the best of your 10:57:07  
2 recollection, do you recall whether the e-mail we  
3 were discussing, which was marked as Exhibit 26, was  
4 prepared in connection with your work on this  
5 response? 10:57:20

6 A No, I don't. I don't know.

7 MR. STODDARD: Okay. Pejman, if we can  
8 refer back to Exhibit 26 briefly.

9 THE WITNESS: Exhibit 26?

10 MR. STODDARD: And I'm going to refer to 10:58:01  
11 Exhibit 2-27 in a moment, Pejman, just so you're  
12 prepared.

13 If we can scroll up again.

14 Q Ms. Felts, do you see here again where it  
15 says -- you refer to "For CPUC Gas Safety Plan, see 10:58:18  
16 pages 22 and 28"?

17 A Yes.

18 MR. STODDARD: Okay. Can we please now  
19 refer to Exhibit 27.

20 THE WITNESS: Okay. 10:58:42

21 MR. STODDARD: Pejman, please --

22 Q And you see the title at the top of this  
23 document, it again says "CPUC Gas Safety Plan,"  
24 which is the same phrasing you used in the e-mail,  
25 correct? 10:59:01

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1           A    Is this -- was this the attachment to the           10:59:02  
2   e-mail?

3           Q    This was produced in a set of documents by  
4   SED.  It's not clear from the production whether  
5   this was an attachment to the e-mail or not.  That           10:59:13  
6   was going to be a question I was going to ask you.

7                    Do you know whether this was the  
8   attachment to the e-mail?

9           A    It may have been, but I don't know  
10   specifically.  I can't tell from this, but this           10:59:26  
11   is --

12          Q    We're not --

13          A    This is a San Bruno safety plan, so I  
14   don't know.

15          Q    We weren't able to determine whether or           10:59:39  
16   not it's the attachment in part because SED did not  
17   Bates stamp the documents.  But it was in a set of  
18   documents produced in response to SED Data  
19   Request -- SED Data Response 11.

20          A    Okay.   10:59:55

21          Q    But we couldn't -- yeah.  Again, there's  
22   no Bates stamp.

23          A    Okay.

24                    MR. STODDARD:  Pejman, can you please  
25   scroll down to the next page?                               11:00:03

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1 Q Ms. Felts, if I can refer you -- and this 11:00:10  
2 table, if you'll just look at it briefly, goes  
3 vertically. The numbering goes vertically, just to  
4 orient you to the document, and then in columns --

5 A Right. 11:00:24

6 Q -- it appears.

7 If you'll refer to Item 3 --

8 A Okay.

9 Q -- where it says "GSRB will audit  
10 operators' procedures to ensure they're safe," do 11:00:33  
11 you know what "GSRB" refers to?

12 A That's No. 4? Is that what --

13 Q I'm sorry. You're correct.

14 A Okay. And "GSRB," no, I don't know what  
15 that is. 11:00:52

16 Q Is it the gas safety and reliability  
17 branch of SED? Does that ring a bell?

18 A No. I'm totally unfamiliar with the  
19 organization of SED.

20 Q Okay. Do you know whether that task has 11:01:06  
21 occurred?

22 A I have no idea.

23 Q Okay. Do you see Item 3 above it?

24 A Yes.

25 Q "GSRB will comprehensively inspect the 11:01:18

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1 physical condition of the gas system"? 11:01:22

2 A Yes.

3 Q Do you know whether that's occurred?

4 A No.

5 MR. GRUEN: I'm going to object to this 11:01:25

6 line of questioning as irrelevant. This is asking

7 about a San Bruno-related matter which has -- it's

8 asking about transmission lines and perhaps

9 distribution lines. And to the extent that this has

10 any merit and is relevant to any down well gas 11:01:44

11 safety related plans, the line of questioning has

12 yet to show it.

13 MR. STODDARD: Mr. Bruno, I will

14 reiterate -- sorry. Mr. Gruen, I will reiterate my

15 request that you state your objections briefly. 11:01:57

16 You just supplied information in your

17 objection that could be interpreted as testifying on

18 behalf of the witness.

19 MR. GRUEN: I'm going to restate the

20 objection. I disagree with that characterization. 11:02:16

21 The objection is concisely stated and it

22 is providing support -- supporting information for

23 the objection -- the conclusion and objection.

24 We've been asked by SoCalGas in motions to

25 not make conclusory objections, and that's exactly 11:02:32

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1 what we're trying to avoid here in making that clear 11:02:34  
2 for the record, and now we're being admonished for  
3 it. I think that's inappropriate on SoCalGas's  
4 part.

5 MR. STODDARD: Pejman, can we refer back, 11:02:47  
6 please, to Exhibit 2-26 briefly, and then we'll  
7 switch back to 2-27.

8 Q Again, Ms. Felts, you see here where it  
9 says in your e-mail, subject line, "Gas Safety  
10 Plans," "Darryl, see attached. Both found with a 11:03:25  
11 simple search on the CPUC website. For CPUC Gas  
12 Safety Plan, see pages 22 and 28."

13 Do you see that?

14 A Yes.

15 MR. STODDARD: Okay. Pejman, please go 11:03:40  
16 back to Exhibit 2-27. And please navigate to  
17 page 22 of this document.

18 I can't see the page number. If you can  
19 maybe zoom out a tiny bit, it might be easier for  
20 people to see it. 11:04:15

21 Q Ms. Felts, do you see here in the second  
22 column, second row, the language that states,  
23 "Develop format and content for gas corporations to  
24 report on gas storage and safety activities"?

25 A Yes. 11:04:34

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1 Q In your e-mail where you referenced 11:04:37  
2 page 22, do you think you were referring to this  
3 language?

4 A Well, in my e-mail, I pointed out that  
5 it's probably related to underground storage tanks 11:04:50  
6 and pipeline storage, but that we could do a simple  
7 search for storage, and I'm sure that's what I did  
8 to find this entry.

9 Q And you think that this relates to  
10 underground storage tanks and pipelines? 11:05:06

11 A Yes.

12 Q What's your basis for that opinion?

13 A Because this is under "Pipeline Safety  
14 Enhancement Plans" for each operator above where you  
15 see Task 11, and the content of the safety plan is 11:05:21  
16 about pipelines.

17 Q And Ms. Felts, based on what you're seeing  
18 here today, as you're familiarizing yourself with  
19 this document, do you think this is a gas safety  
20 plan for a particular utility? 11:05:38

21 A This is a gas safety plan for PG&E, I  
22 think.

23 MR. STODDARD: Pejman, can we please  
24 navigate back up to the matrix, page 2?

25 Q One other question here, and then we'll 11:06:01

1 move on. 11:06:03

2 Item 25 in this list where it states, "SED

3 will use regular management audits to benchmark and

4 evaluate progress," and this is under the column

5 "Instilling Safety Culture in Gas Operators," do you 11:06:16

6 know whether this task has occurred?

7 A Whether it was what?

8 Q Whether this task has occurred.

9 A I'm sorry. I just couldn't understand

10 what you said. 11:06:32

11 Q Sorry. I'll restate the question.

12 Item 25 here that states, "SED will use

13 regular management audits to benchmark and evaluate

14 progress," do you see that?

15 A Yes. 11:06:43

16 Q And this is under the column "Goal

17 Instilling Safety Culture in Gas Operators."

18 Do you see that?

19 A Yes.

20 Q Ms. Felts, do you know whether this task 11:06:52

21 has been completed?

22 A Oh. No, I have no idea.

23 MR. STODDARD: Okay. Pejman, if we can

24 turn to page 23 of the PDF, please. I'm sorry,

25 Pejman. I know I asked you to shrink it before, but 11:07:13

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1 can you please blow it up a little bit? 11:07:17

2 Q Ms. Felts, do you see here where it says

3 in the header, "Task 12: The CPUC will consider

4 installation of automatic and remote valves and

5 safety enhancements"? 11:07:29

6 A Yes.

7 Q And it's your testimony today that your

8 understanding of this document is that it's limited

9 to gas pipeline systems, correct?

10 MR. GRUEN: Objection. Misstates 11:07:44

11 testimony.

12 THE WITNESS: This is -- it appears to be

13 related to requirements that came out of the

14 San Bruno investigation.

15 BY MR. STODDARD: 11:08:04

16 Q Do you recall when that incident occurred?

17 A No. The date?

18 Q Or approximately.

19 A I used to know, but I don't know now.

20 Q Okay. 11:08:18

21 A Darryl probably knows.

22 Q Well, we're asking you. But that's fair.

23 You don't have to remember that.

24 Do you think it was within the past decade

25 or longer? 11:08:33

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1 MR. GRUEN: I'm going to object. She's 11:08:41  
2 already stated she doesn't know.

3 But she can answer if she can.

4 THE WITNESS: I don't know. Probably ten  
5 years ago maybe. I don't know. 11:08:49

6 BY MR. STODDARD:

7 Q Ms. Felts, is it your understanding that  
8 this document -- again, I asked whether it's your  
9 understanding that this document is limited to gas  
10 pipeline systems. And just to confirm, is that your 11:09:02  
11 understanding?

12 A I think it is related to pipeline systems.

13 Q Okay. So then you would view it as not  
14 being applicable to underground gas storage  
15 facilities? 11:09:21

16 A Yeah. I don't know why there would be  
17 anything about underground gas storage facilities  
18 like Aliso in this plan.

19 Q Why do you say that?

20 A Because it's -- everything we've looked at 11:09:37  
21 that's related to pipelines, transmission pipelines.

22 Q Well, except for the item we just  
23 discussed on page 22, correct?

24 A Yes, but PG&E has in-line storage.

25 Q Can you please explain what you mean? 11:10:00

1           A    They pressure wide sections of pipeline           11:10:02  
2   with gas.  Instead of having it stored underground,  
3   they store it in pipeline sections.

4           Q    Okay.  And your understanding of this  
5   document, putting aside the date of San Bruno, is           11:10:19  
6   that it appears that this is responsive to the  
7   San Bruno incident?

8           A    Everything on this page 12 fell right out  
9   of that case.

10          Q    Ms. Felts, do you see in row 2, rather           11:10:36  
11   column 2, row 1, where it states, "Require operators  
12   to equip SCADA system with tools to recognize  
13   leaks"?

14          A    Yes.

15          Q    Would you agree that this indicates that           11:10:47  
16   at the time of this document, the PUC was  
17   considering requiring operators to equip SCADA  
18   systems with tools to recognize leaks?

19          A    Yes.  That was a requirement at the end of  
20   the San Bruno case.   11:11:04

21          Q    Applicable to pipelines?

22          A    Yes.

23          Q    That hadn't previously existed?

24          A    Yes.

25          Q    Thank you.  Let's move on.                   11:11:17



1 would you expect to see a decrease in well 11:12:33  
2 productivity if there were corrosion present in a  
3 well?

4 A Well --

5 MR. GRUEN: Objection. Objection. Vague 11:12:44  
6 and overly broad.

7 She can answer.

8 THE WITNESS: Internal corrosion might  
9 cause a change in production, but external corrosion  
10 would not. 11:12:54

11 BY MR. STODDARD:

12 Q And how would that happen?

13 A It changes the flow rate of the gas  
14 because of the -- the corrosion disturbs or changes  
15 the smoothness of the internal pipe. 11:13:14

16 Q I understand. So would it be correct to  
17 say that if it's internal corrosion, it could form  
18 kind of an occlusion within the pipe?

19 A No. Well, I don't think it would  
20 necessarily be an occlusion. But it would make the 11:13:28  
21 internal walls of the pipe rough. And so that  
22 affects the flow of the gas.

23 Q Would the same be true for erosion?

24 A Yes.

25 MR. STODDARD: Okay. I'm going to refer 11:13:48

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1 back to yesterday's transcript for a follow-up 11:13:50  
2 question on one of your statements. And this is  
3 at --

4 Carla, would you be able to read something  
5 back if I gave you the lines from yesterday's rough 11:14:07  
6 transcript?

7 THE REPORTER: Yeah, I should be able to  
8 find it okay. It might help if we go off the record  
9 and figure out the portion.

10 MR. STODDARD: That's fine. We can do 11:14:20  
11 that.

12 Actually, we've been going for -- Darryl,  
13 sorry, maybe you were going to say this -- but we've  
14 been going for an hour and 15 minutes. Do you want  
15 to take a short break while we do this? 11:14:26

16 MR. GRUEN: I was just going to say no  
17 objection to going off the record, and your  
18 suggestion to take a break makes sense.

19 How long did you say you wanted to take?

20 MR. STODDARD: I need to take a quick 11:14:35  
21 break anyway, so if we're going to do this and take  
22 a break, let's just make it ten minutes.

23 MR. GRUEN: Margaret, is that okay with  
24 you?

25 THE WITNESS: Yes. 11:14:43

1 THE VIDEO OPERATOR: The time is 11:14:46  
2 11:14 a.m., and we are off the record.

3 (Recess, 11:14 a.m. - 11:31 a.m.)

4 THE VIDEO OPERATOR: The time is  
5 11:31 a.m., and we are back on the record. 11:31:32

6 MR. STODDARD: During break, I referred  
7 the court reporter to language from the rough from  
8 yesterday's transcript, and I'm going to ask her to  
9 read back Ms. Felts's answer on a specific issue,  
10 and then I'll ask some questions about it. 11:31:53

11 (Record read as follows:

12 "Answer: I don't have specifics because,  
13 again, I don't have all the specific  
14 information that I would need. But I would  
15 think that there could be a situation where 11:32:19  
16 there's overpressuring occurring in the -- in  
17 a well that they wanted to release.")

18 BY MR. STODDARD:

19 Q Ms. Felts, do you recall discussing  
20 overpressuring in the context of your alleged 11:32:28  
21 Violation 331 regarding the release of gas or the  
22 release of fluids from the well on November 13th,  
23 2015?

24 A Yes.

25 Q Can you explain what you meant by 11:32:46

1 "overpressuring" there? 11:32:47

2 A I just meant that there could be a high  
3 pressure in the well itself. It would be in the  
4 tubing. Do you want more?

5 Q So there would be a high pressure in the 11:33:06  
6 tubing, and that -- and the operator might  
7 deliberately release the fluids to relieve the  
8 pressure? Is that what you were saying?

9 A Yes. Release the pressure on the well.

10 Q Okay. And what would happen in that 11:33:27  
11 circumstance if the operator didn't release the  
12 pressure?

13 A I don't know. I mean, I don't know  
14 exactly what was going on with the well on that day.  
15 So there could be any number of reasons why there 11:33:45  
16 would be a decision to release pressure that had  
17 built up in a well.

18 Q Can you describe some of those?

19 A Not without looking into the specifics of  
20 the well. 11:34:00

21 Q Well, your statement here was your  
22 opinion, and I believe you said it was your opinion  
23 based on your engineering background as to a  
24 possible scenario where someone might deliberately  
25 release fluids from a well. 11:34:17



1       theoretically could damage some equipment either you                   11:36:00  
2       put in the well or that's on a wellhead or a valve.  
3       BY MR. STODDARD:  
4               Q     Could damage to the -- to the well casings  
5       inhibit further well kill operations?                                   11:36:19  
6               MR. GRUEN:  Objection.  Calls for  
7       speculation.  
8               She can answer.  
9               THE WITNESS:  In this particular instance,  
10       I don't think it would be possible for them -- for                   11:36:29  
11       them to over -- for the well to be overpressured  
12       from reservoir pressure to the point that it would  
13       damage the casing, except for where the casing was  
14       already damaged, was already failed.  
15               So for instance, if you put a lot of                           11:36:52  
16       pressure on the surface -- not the surface casing  
17       but the 7-inch casing that had failed and was  
18       leaking to a shallow gas zone, then potentially the  
19       high pressure could push more gas into the areas  
20       around the well, not only coming up to a surface,                   11:37:14  
21       but disappearing into the sand, the shallow sand.  
22       So you wouldn't want to do that.  
23       BY MR. STODDARD:  
24               Q     Could overpressuring the well result in  
25       damage to the formation?   11:37:31



1 that? 11:38:53

2 A I mean, the engineers that are in charge  
3 of the project would consider it an issue if these  
4 are safety -- or operationally an issue to have the  
5 higher pressure, so they would release it to a lower 11:39:08  
6 pressure.

7 Q And by "safety," you mean both the safety  
8 of the well and the safety of the personnel on-site?

9 A Yes, just generally.

10 Q Thank you. 11:39:24

11 Ms. Felts, we're very close to being done.  
12 I appreciate your patience. I think we really just  
13 have one more line of questioning to run through  
14 here.

15 Yesterday we were discussing a little bit 11:39:41  
16 about also your withdrawal of violations related to  
17 well kill plans on the relief well SS-25A and  
18 SS-25B, correct?

19 A Remind me again what that is.

20 Q You recall, we were discussing withdrawal 11:40:05  
21 of alleged violations in your -- strike that.

22 Yesterday, Ms. Felts, do you recall  
23 discussing withdrawal of violations related to  
24 SoCalGas's failure to have in place well kill plans  
25 regarding SS-25A and B and the relief well? 11:40:24

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1 which I wasn't aware of when the initial opening 11:41:54

2 testimony came out.

3 I don't know if Blade was aware of it or  
4 not.

5 Q Ms. Felts, among the documents produced by 11:42:08

6 SED in response to our Data Request No. 11, it

7 included your marked-up copy of the Blade report,

8 which included highlighting in pencil marks, and it

9 makes apparent that you reviewed the plan.

10 Ms. Felts, how did you decide which of 11:42:29

11 Blade's findings and recommendations constituted

12 violations of 451 and which did not?

13 MR. GRUEN: I'm going to object to that

14 as -- to the extent it's stating testimony. It

15 sounds like counsel is testifying. 11:42:46

16 But she can answer the latter part, which

17 I think the question is.

18 THE WITNESS: Well, as you know, the

19 testimony was drafted before I came on to the case,

20 before my contract. 11:43:04

21 I reviewed the violations that were

22 identified, and my understanding by reviewing the

23 Blade report and reviewing the opening testimony was

24 that the violations came straight off of

25 recommendations in the -- in the Blade report. They 11:43:21

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1 were pretty easy to spot. 11:43:27

2 I did not look for additional violations

3 in the Blade report. I just went through and

4 verified where they came from.

5 And the ones that -- all of them seemed 11:43:42

6 very reasonable to me when I adopted the testimony.

7 The discovery of a safety plan -- I mean,

8 of the -- I guess, whatever that plan is called, for

9 the relief well didn't occur until much later when I

10 found it in some -- attached to some of the e-mails 11:44:02

11 in response -- that were provided in response to

12 DR 16, I think.

13 BY MR. STODDARD:

14 Q Okay. And you said that all of them

15 appeared to be reasonable to you when you reviewed 11:44:15

16 the testimony that you were asked to sponsor.

17 Ms. Felts, how did you decide whether or

18 not they were reasonable, aside from reviewing the

19 Blade report?

20 MR. GRUEN: Objection. Vague. It's a 11:44:29

21 mischaracterization of testimony unless counsel can

22 show where the reference to the statement he just

23 characterized is.

24 She can answer.

25 THE WITNESS: Well, so the Blade report is 11:44:52

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1 written by a whole host of very well-qualified 11:44:54  
2 engineers, and I don't need to try to dispel  
3 their -- their conclusions. I think they're  
4 well-based.

5 I looked at not only the main report, but 11:45:14  
6 all of their -- the supplementary reports, the  
7 additional volumes and the supplementary reports,  
8 and everything seemed to be in order that I -- from  
9 an engineering perspective, I didn't see anything  
10 that was real questionable. 11:45:30

11 I think I pointed out that I had an issue  
12 initially about the leaking, both the identification  
13 of leaks at the bottom of the well, but I eventually  
14 resolved that through their language.

15 And just generally, I think it's a 11:45:50  
16 well-done set of reports and that they did their due  
17 diligence from an engineering perspective.

18 BY MR. STODDARD:

19 Q Aside from their recommendations related  
20 to kill plans on SS-25A and 25B, correct? 11:46:04

21 A And you could ask them. They'll be at the  
22 hearings. You could ask them about their  
23 recommendation for kill plans, and maybe they have a  
24 good explanation for it.

25 But from my perspective, I felt like that 11:46:21

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1 was an overreach for the PUC. 11:46:23

2 Q Well, their explanation, I mean -- I think

3 as you stated yesterday -- may be that it was a -- a

4 reasonable measure to recommend going forward,

5 right, but not necessarily a basis for a violation? 11:46:39

6 A Right.

7 Q Did you consider whether that was the case

8 for others of Blade's recommendations?

9 A I kept in mind all of the violations as

10 I've gone through the data, the documents that have 11:46:50

11 been provided. So far I haven't run across anything

12 else similar.

13 Q Aside -- sorry. I interrupted you.

14 A That's okay.

15 Q Aside from reviewing the data in the Blade 11:47:04

16 report, did you also review Public Utilities Code

17 Section 451?

18 A I have read that a few times.

19 Q And in short, how would you describe your

20 understanding of Public Utilities Code Section 451? 11:47:22

21 MR. GRUEN: I'm going to object to the

22 extent this line of questioning is going to lead to

23 calling for a legal conclusion.

24 But she can answer the question.

25 THE WITNESS: I think that's already in 11:47:34

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1 the transcript from yesterday. You asked me that, 11:47:34  
2 and I answered it.

3 BY MR. STODDARD:

4 Q Do you want me to search back for the  
5 transcript or do you want to -- would you prefer to 11:47:40  
6 answer it right now?

7 A I don't want to give you two different  
8 sets of wording for the same answer, so it would be  
9 best to just read what I already said.

10 Q All right. I will go and reference the 11:47:55  
11 transcript. Just give me a moment.

12 MR. GRUEN: While there's reference, I'll  
13 just -- I couldn't have stated the objection better,  
14 but the objection is asked and answered, for the  
15 record. 11:48:17

16 MR. STODDARD: I do not see any -- in the  
17 rough transcript I'm looking at, I see one reference  
18 to Section 451, and it is not this question. But I  
19 am open to being corrected if I'm missing it.

20 THE WITNESS: Okay. Well, if you want to 11:49:00  
21 read me 451, then I'll answer the question, or put  
22 it up so I can look at it. Then I can be more  
23 precise. I mean, it's not very long.

24 MR. STODDARD: Pejman, are you able to  
25 bring up Public Utilities Code Section 451 for 11:49:29

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1 Ms. Felts to review, please? 11:49:32

2 MR. MOSHFEGH: I understand. It will take

3 a second.

4 MR. STODDARD: Pejman, I think we're

5 seeing the entirety of your screen, just so you're 11:50:37

6 aware, but that might be the only way to do it.

7 Q Ms. Felts, can you see the text of Public

8 Utilities Code Section 451 on the screen?

9 MR. GRUEN: I'm just going to note on the

10 record, I was reviewing the transcript from 11:50:47

11 yesterday, and there is a question which asks, "So

12 in your view, anything which is unsafe is a

13 violation of Section 451?"

14 After the objection, the witness stated,

15 "I think 451 is very broad in itself. That would 11:51:01

16 cover all safety violations."

17 So to the extent this line of questioning

18 covers what's been asked and answered there, the

19 objection to asked and answered still applies.

20 THE WITNESS: Okay. I see it. 11:51:21

21 BY MR. STODDARD:

22 Q Have you had a moment to review it?

23 A Yes.

24 Q What is your understanding of Public

25 Utilities Code 451 in connection with the 11:51:33

1 violations, generally in connection with the 11:51:36  
2 testimony you're offering regarding the violations?  
3 MR. GRUEN: Objection. Vague, overbroad,  
4 asked and answered.  
5 THE WITNESS: Okay. Under 451, the second 11:51:49  
6 little section there, it looks like it starts with,  
7 "Every public utility," and it reads, "shall furnish  
8 and maintain such adequate, efficient, just and  
9 reasonable service, instrumentalities, equipment,  
10 and facilities including telephone facilities as 11:52:06  
11 defined in Section 54.1 of the civil code, as are  
12 necessary to promote the safety, health, comfort,  
13 and convenience of its patrons, its employees, and  
14 the public."  
15 So my shorthand version of that is a 11:52:25  
16 public utility should operate their systems to  
17 promote safety, health, comfort and convenience of  
18 patrons, employees, and the public, "safety" being  
19 the applicable word in this case.  
20 BY MR. STODDARD: 11:52:52  
21 Q Ms. Felts, do you also see reference to  
22 the word "reasonable" there?  
23 A "Reasonable service." Yes.  
24 Q Okay. So in your view, reasonableness  
25 doesn't play into the safety part? 11:53:02

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1 MR. GRUEN: Objection. Calls for a legal 11:53:03  
2 conclusion and overly broad. This line of questions  
3 is going down something I thought we had agreed  
4 about at the prehearing conference not to do, which  
5 is ask SED's witnesses about -- related to the 11:53:15  
6 conclusions of the violations.

7 I'm noting that for the record. If  
8 SoCalGas is going to insist on pursuing this, okay,  
9 but we're going to stand on that objection.

10 The witness can answer. 11:53:35

11 THE WITNESS: What's the question?

12 BY MR. STODDARD:

13 Q Let me look back at my question.

14 Ms. Felts, do you also see reference to  
15 the word "reasonable" there? 11:54:31

16 A Yes.

17 Q And I said, "Okay. So in your view,  
18 reasonableness doesn't play into the safety part?"

19 MR. GRUEN: Objection. Calls for a legal  
20 conclusion. 11:54:44

21 THE WITNESS: Okay. So if we're just  
22 looking at Section 451, "reasonable" modifies  
23 "service," not "safety."

24 And so the utility is required to provide  
25 reasonable service, and as are necessary to promote 11:55:03

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1 safety. So two different things. I don't know how 11:55:11  
2 reasonableness in this code section applies to  
3 safety.

4 BY MR. STODDARD:

5 Q Okay. So in your view, then, any unsafe 11:55:20  
6 condition, regardless of the reasonableness of  
7 SoCalGas's conduct, could potentially be a violation  
8 of 451?

9 MR. GRUEN: Objection. Vague, overbroad,  
10 calls for a legal conclusion, calls for speculation. 11:55:33

11 She can answer.

12 THE WITNESS: In my experience, in  
13 reasonableness hearings and in safety  
14 investigations, I would agree with that statement.

15 BY MR. STODDARD: 11:55:46

16 Q Okay. Ms. Felts, are you aware of any  
17 direction from SED to Blade regarding the scope of  
18 its investigation?

19 A No.

20 Q Ms. Felts, we're wrapping up here. 11:56:03

21 Is it correct to say that your testimony  
22 includes the opinions, findings, and allegations  
23 that you are providing in connection with this  
24 proceeding?

25 MR. GRUEN: I'm going to object as vague. 11:56:21

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1 She can answer if she understands. 11:56:25

2 THE WITNESS: Are you asking me if my

3 testimony includes my opinions?

4 BY MR. STODDARD:

5 Q Yes, that you're offering in this 11:56:35

6 proceeding.

7 A It's a combination. So in a normal

8 situation like this where I was brought on as an

9 expert, I would also call in specialists, like a

10 metallurgist or, you know, drilling engineer. 11:56:53

11 But in this case, the experts were already

12 here. That's the Blade engineers. And so anything

13 in the opening testimony basically falls back on

14 their expertise, and then there are sections of

15 subsequent testimony that are my opinions and based 11:57:17

16 on my expertise.

17 Q Ms. Felts, do you have any opinions that

18 are not -- with respect to this proceeding that we

19 should be aware of that are not reflected in the

20 testimony? 11:57:37

21 MR. GRUEN: Objection. Overbroad, vague.

22 She can answer.

23 THE WITNESS: Do I have opinions that are

24 not reflected in testimony?

25 ///

11:57:46

1 BY MR. STODDARD: 11:57:46

2 Q Are you offering any opinions in  
3 connection with this proceeding that are not  
4 contained in your testimony?

5 MR. GRUEN: Objection. Vague, overbroad. 11:57:52  
6 She can answer.

7 THE WITNESS: No.

8 BY MR. STODDARD:

9 Q Okay.

10 A Not that I'm aware of. 11:57:57

11 Q And your testimony identifies the basis  
12 for those opinions, correct?

13 A Yes.

14 Q And your testimony identifies the facts  
15 that are relied upon in connection with those 11:58:07  
16 opinions, correct?

17 A Yes.

18 MR. STODDARD: Thank you very much.  
19 That's all I have.

20 MR. GRUEN: Jack, if you don't mind, could 11:58:22  
21 we go off the record and just take a short  
22 five-minute break?

23 MR. STODDARD: Of course.

24 MR. GRUEN: Okay. Very good.

25 THE VIDEO OPERATOR: The time is 11:58:30

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1 11:58 a.m., and we are off the record. 11:58:30

2 (Recess, 11:58 a.m. - 12:06 p.m.)

3 THE VIDEO OPERATOR: The time is

4 12:06 p.m. and we are back on the record.

5 MR. GRUEN: Thank you. 12:06:25

6 For the record, this is Darryl Gruen for

7 Safety and Enforcement Division, and I'm noting for

8 the record that Safety and Enforcement Division has

9 no questions on redirect.

10 So with that, Jack, can we end the 12:06:41

11 deposition now?

12 MR. STODDARD: Yes. I have just one last

13 procedural housekeeping item. I just want to ensure

14 that we're moving all the exhibits identified in

15 today's deposition into the record, and that those 12:07:01

16 will be included in the distribution with the

17 transcript.

18 MR. GRUEN: Yeah, we have no objection.

19 Just a clarification, the term "record." We're not

20 objecting to them being included in the record for 12:07:15

21 the deposition, but it's a different matter about

22 including them in the record for the -- the

23 evidentiary record for the proceeding.

24 MR. STODDARD: Understand and agree.

25 MR. GRUEN: Okay. Very good. With 12:07:24

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I, MARGARET C. FELTS, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,  
2021, at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

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MARGARET C. FELTS, VOLUME III

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I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [ ] was [ ] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: March 2, 2021

*Carla Soares*

CARLA SOARES  
CSR No. 5908

[& - access]

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[believe - concisely]

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[concisely - diamond]

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[failure - good]

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[operate - please]

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[please - reasonableness]

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