

Docket:	<u>I.19-06-016</u>
Exhibit Number	<u>CalPA-453</u>
Commissioner	<u>Rechtschaffen</u>
Admin. Law Judge	<u>Hecht/Poirier</u>
Witness	_____



**PUBLIC ADVOCATES OFFICE**  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**

Exhibit CalPA-453

SoCalGas's Response to Data Request 58 dated March 8, 2022

San Francisco, California  
March 18, 2022

**ORDER INSTITUTING INVESTIGATION ON THE COMMISSION'S OWN MOTION INTO THE OPERATIONS AND PRACTICES OF SOUTHERN CALIFORNIA GAS COMPANY WITH RESPECT TO THE ALISO CANYON STORAGE FACILITY AND THE RELEASE OF NATURAL GAS, AND ORDER TO SHOW CAUSE WHY SOUTHERN CALIFORNIA GAS COMPANY SHOULD NOT BE SANCTIONED FOR ALLOWING THE UNCONTROLLED RELEASE OF NATURAL GAS FROM ITS ALISO CANYON STORAGE FACILITY  
(I.19-06-016)**

**SOUTHERN CALIFORNIA GAS COMPANY**

**(DATA REQUEST CAL ADVOCATES-SCG-58 DATED OCTOBER 28, 2021)**

**SOCALGAS RESPONSE DATED MARCH 8, 2022**

SoCalGas provides the following Responses to the Public Advocates Office (Cal Advocates) data request dated October 28, 2021 in I.19-06-016. The Responses are based upon the best available, nonprivileged information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request, and within SoCalGas' possession, custody, or control. SoCalGas' responses do not include information collected or modeled by Blade Energy Partners' during its Root Cause Analysis Investigation. SoCalGas reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

SoCalGas objects to the instructions submitted by Cal Advocates and to the continuing and indefinite nature of this request on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature and continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(d) and 030.060(g), respectively. SoCalGas will provide responsive documents in existence at the time of its response. Should Cal Advocates seek to update its request, SoCalGas will respond to such a request as a new data request in the future.

SoCalGas submits these Responses, while generally objecting to any Request that fails to provide a defined time period to which SoCalGas may tailor its Response, and to the extent that any Request is overly broad, vague, ambiguous, unduly burdensome, assumes facts, or otherwise fails to describe with reasonable particularity the information sought. SoCalGas further submits these Responses without conceding the relevance of the subject matter of any Request or Response. SoCalGas reserves the right to object to use of these Responses, or information contained therein, in any dispute, matter or legal proceeding. Finally, at the time of this Response, there are no pending oral data requests from Cal Advocates to SoCalGas.

**QUESTION 1:**

Please see attached Cal Advocates Data Request to Boots & Coots dated June 23, 2021.

Please obtain answers to each of the questions in this Data Request from Boots & Coots. Where Boots & Coots is not willing to answer a question, please (1) explain why Boots & Coots will not answer the question and (2) have the SoCalGas employee most knowledgeable about the answer to the question provide an answer to the best of their

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ability based on what they know from communications or interactions with Boots & Coots.

For each question answered by a SoCalGas employee, please identify the name and position of that SoCalGas employee.

**RESPONSE 1:**

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and exceeds the scope determined for this proceeding in the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas further objects to this request to the extent the information sought in CalAdvocates-B&C-001 is equally available to Cal Advocates in one or more prior responses, including SoCalGas' response to Cal Advocates Data Request 35. SoCalGas further objects to his request to the extent it was raised in Cal Advocates' August 2021 Motion to Compel and denied by the ALJs' October 15, 2021 *E-mail Ruling on Public Advocates Office Motion to Compel*. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. Except as addressed in the responses below, CalAdvocates-B&C-001 seeks information that is uniquely within Boots & Coots knowledge, custody, or possession and, therefore, SoCalGas cannot respond on Boots & Coots' behalf. Moreover, SoCalGas notes that Boots & Coots filed a motion for protection in Texas state court in connection with CalAdvocates-B&C-001, which explained, at least in part, why Boots & Coots was moving for protection. This motion for protection was served on counsel for Cal Advocates on July 30, 2021. Beyond what Boots & Coots has noted in its filings and what SoCalGas has previously explained on the record in this proceeding, SoCalGas does not know the reason(s) why Boots & Coots refused to provide responses to Cal Advocates' data request to Boots & Coots. Below, SoCalGas provides responses to a select number of questions in CalAdvocates-B&C-001 that are within SoCalGas' knowledge.

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**CalAdvocates-B&C-001, Question 2**

Regarding communications between Mr. Walzel and Dr. Haghshenas:

(a) Please confirm whether Mr. Walzel communicated with Dr. Haghshenas about

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the well kill efforts and the modeling performed for those efforts.

- (b) Please identify how Mr. Walzel communicated with Dr. Haghshenas regarding the well kill efforts, and whether any written assumptions were provided to Dr. Haghshenas.
- (c) If Dr. Haghshenas was not provided any information regarding the assumptions used to model the well kill efforts, please explain how Dr. Haghshenas would have been able to properly analyze or comment on the proposed well kill efforts, or the results of the prior well kill efforts.

**RESPONSE**

- (a) Subject to and without waiving the forgoing objections, SoCalGas responds as follows. Based on information within SoCalGas' possession, including email correspondence and deposition testimony, Mr. Walzel and Dr. Haghshenas communicated in writing (email) and verbally regarding well kill efforts and well kill modeling.
- (b) SoCalGas objects to this request as vague and ambiguous, in particular with regards to the phrase "any written assumptions." Subject to and without waiving the forgoing objections, SoCalGas responds as follows. See Response 2(a).
- (c) SoCalGas objects to this request to the extent that it calls for SoCalGas to speculate about communications between and among Boots & Coots personnel. SoCalGas further objects to this request to the extent it assumes that Dr. Haghshenas was not provided any information regarding the assumptions used to model the well kill efforts. Subject to and without waiving the forgoing objections, SoCalGas responds as follows: N/A.

**CalAdvocates-B&C-001, Question 3a**

Provide all documents regarding modeling for Aliso Canyon well kill efforts between 2015 and 2016; and

**RESPONSE**

SoCalGas objects to this request as vague and ambiguous with respect to the phrases "documents regarding modeling," and "well kill efforts." SoCalGas further objects to this

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request to the extent that it seeks information outside of SoCalGas' possession or control. SoCalGas further objects to this request to the extent the information sought in CalAdvocates-B&C-001 that is within SoCalGas' possession and control is equally available to Cal Advocates in one or more prior responses, including SoCalGas' response to Cal Advocates Data Request 35. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. SoCalGas has provided information regarding the well kill modeling performed by Boot & Coots in connection with Boots & Coots's efforts to control well SS-25, including top kill attempts and relief well efforts. See e.g., SoCalGas' November 12, 2021 Response to Cal Advocates DR 51. SoCalGas is also producing a limited number of communications between Mr. Walzel and Dr. Haghshenas that are potentially related to well kill modeling. Please see documents Bates numbered: I1906016\_SCG\_CALADVOCATES\_0067036 - 67041.

**CalAdvocates-B&C-001, Question 9**

Please provide all documents provided by SoCalGas to the Boots & Coots staff that participated in the well kill efforts, including without limitation, any wellbore schematics of the wells at Aliso Canyon.

**RESPONSE**

SoCalGas objects to this request on the grounds it is overly broad, unduly burdensome, harassing, and vague and ambiguous with respect to the phrase "that participated in the well kill efforts." SoCalGas further objects to this request to the extent the information sought in CalAdvocates-B&C-001 has been made available to Cal Advocates in multiple prior productions and responses. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. See SoCalGas' response to Cal Advocates Data Request 35, and SoCalGas' response to Cal Advocates Data Request 51, Question 5 (stating, "Documents responsive to this request were provided in response Cal Advocates Data Request 35 (see I1906016\_SCG\_CALADVOCATES\_0018894 - I1906016\_SCG\_CALADVOCATES\_0043718; I1906016\_SCG\_CALADVOCATES\_0044171 - I1906016\_SCG\_CALADVOCATES\_0065108. Additionally, as Mr. Schwecke testified during the evidentiary hearing, SoCalGas provided Boots & Coots the hard copy well file for well SS-25 (Evidentiary Hearing (May 18, 2021) Tr. 2752:11 – 2753:10 (R. Schwecke).) An electronic version of the SS-25 well file was produced in this proceeding (see Exhibit SED-R-295 [738-page PDF containing portions of SS-25 well

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file]).”)

**CalAdvocates-B&C-001, Question 10**

Please provide all of the Boots & Coots Daily Operating Reports (aka “DOR”) related to the Aliso Canyon well kill efforts performed between 2015 and 2016.<sup>1</sup>

**RESPONSE**

SoCalGas objects to this request unduly burdensome and harassing to the extent that the “Daily Operating Reports” are equally available to Cal Advocates, including within the exhibit that Cal Advocates cites in the footnote 1 of this same question. SoCalGas further objects to this request to the extent the information sought in CalAdvocates-B&C-001 has been made available to Cal Advocates in multiple prior productions and responses. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. SoCalGas understands this request to seek Daily Operations Reports for the top kill efforts at well SS-25. See SoCalGas’ response to Cal Advocates Data Request 35, and SoCalGas’ response to Cal Advocates Data Request 51, Question 6 (stating, “The Boots & Coots Daily Operations Reports are available in the record of this proceeding. (See Exh. SoCalGas-09 at 9.0019 – 9.0196 or Exh. SED-227 [Boots & Coots’ Daily Operations Reports from October 26, 2015 through February 18, 2016].)”).

**CalAdvocates-B&C-001, Question 11**

Please provide copies of all legal hold orders or other orders or instructions requiring you to preserve evidence related to the Aliso Canyon leak incident.

**RESPONSE**

SoCalGas objects to this request unduly burdensome, and to the extent this request is directed to Boots & Coots pursuant to the definition of “you” in CalAdvocates-B&C-001 and, thus, seeks information beyond SoCalGas’ knowledge, custody, or control. SoCalGas further objects to the extent this information is equally available to Cal Advocates. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. See Exhibit SED-215 at SED SUR\_REPLY\_001800 – 001801.