

SoCalGas-35

Deposition Transcript of Margaret C. Felts (Feb. 5, 2020)

I.19-06-016

ALJs: Hecht/Poirier

Date Served: March 15, 2021

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Investigation) I.19-06-016
on the Commission's Own Motion) (Filed 6-27-19)
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).)
_____)

DEPOSITION OF MARGARET C. FELTS
Los Angeles, California
Wednesday, February 5, 2020
MORNING SESSION

Reported by:
LINDA RYAN
CSR No. 9915
JOB No. 311652

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(U904G) .)
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Videotaped Deposition of
MARGARET C. FELTS, pages 1 through
326, taken in accordance with
Article 10 of the Commission's Rules
of Practice and Procedure, taken on
behalf of the Southern California Gas
Company, at 300 South Grand Avenue,
Twenty-Second Floor, Los Angeles,
California, beginning at 9:23 a.m. and
ending at 8:39 p.m. on Wednesday,
February 5, 2020, before LINDA RYAN,
Certified Shorthand Reporter No. 9915.

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HEIDI FIELDING, Videographer

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MARGARET C. FELTS

BY MR. STODDARD 13

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Los Angeles, California
Wednesday, February 5, 2020
9:23 a.m. - 12:15 p.m.

PLEASE BE ADVISED THAT THE DISMANTLING AND/OR
UNBINDING OF THE ORIGINAL TRANSCRIPT WILL
VOID THE CERTIFICATION OF THE
CERTIFIED SHORTHAND REPORTER AND NULLIFY THE
INTEGRITY OF THE ORIGINAL TRANSCRIPT.

THE VIDEOGRAPHER: Good morning.

Here begins media number one in the
deposition of Margaret C. Felts, Volume 1, in the
matter of Aliso Canyon Storage Facility. This case
is before the Public Utilities Commission of the
State of California, the case number is 1.19-06-016.

Today's date is February the 5th of the year
2020 and the time on the video monitor is 9:23 a.m.

This deposition is taking place at
300 South Grand Avenue, 22nd floor, in Los Angeles,
California 90071-3132, and is being taken on behalf
of the Defendants.

The videographer is Heidi Fielding,
appearing on behalf of Biehl, et al., Certified
Shorthand Reporters.

1 The certified stenographic reporter
2 preparing the official transcript of today's
3 deposition is Linda Ryan, appearing on behalf of
4 Biehl, et al., Certified Shorthand Reporters.

5 Neither the reporter nor myself are
6 employees of Biehl, et al., Certified Shorthand
7 Reporters.

8 Counsel, would you please identify
9 yourselves and state whom you represent.

10 MR. STODDARD: Jack Stoddard for Southern
11 California Gas.

12 MR. MOSHFEGH: Pejman Moshfegh also for Southern
13 California Gas.

14 MS. PATEL: Avisha Patel on behalf of Southern
15 California Gas.

16 MS. MORTAZAVI: Setareh Mortazavi on behalf of
17 Southern California Gas Company.

18 MR. GRUEN: Darryl Gruen on behalf of the
19 Safety Enforcement Division of the California Public
20 Utilities Commission.

21 THE VIDEOGRAPHER: And if our court reporter
22 would please administer the oath to the witness.

23 (Witness sworn.)

24 THE WITNESS: I do.

25 THE VIDEOGRAPHER: Please begin.

1 MR. STODDARD: Thank you.

2

3

MARGARET C. FELTS,

4

having been first duly sworn

5

and administered an oath

6

pursuant to California CCP 2094,

7

was examined and testified as follows:

8

9

EXAMINATION

10

BY MR. STODDARD

11

Q Would you please state your name and your

12

home address.

13

A Margaret C. Felts. And I live at

14

633 Dodge Street, Delta, Colorado 81416.

15

Q Thank you, Ms. Felts.

16

And is this the first time you've ever been

17

deposed?

18

A No.

19

Q How many times have you been deposed before?

20

MR. STODDARD: One moment, brief break.

21

THE VIDEOGRAPHER: Do you wish to go off the

22

record, Counsel?

23

(Whereupon Ms. Shea entered the

24

deposition proceedings.)

25

MR. STODDARD: Yes, please.

1 THE VIDEOGRAPHER: Just a moment.

2 We are off the record at 9:26 a.m.

3 (Off the record.)

4 THE VIDEOGRAPHER: We are back on the record at
5 9:26 a.m.

6 MR. STODDARD: Ms. Felts, apologies.

7 Before we get into the questioning, we're
8 going to address a few initial housekeeping items for
9 purposes of the record.

10 The first is that we had had prior
11 discussions regarding reimbursement or compensation
12 for Ms. Felts' appearance today.

13 SoCalGas agrees to pay for -- pay Ms. Felts
14 directly for her time in appearing in today's
15 deposition and -- with the understanding that SED
16 will pay for her travel time as well as travel
17 expenses.

18 MR. GRUEN: Thank you.

19 And just for the record, SED notes SED does
20 not stipulate to paying for Ms. Felts' travel
21 expenses or other expenses related to the deposition
22 today, and SED reserves the right to request an
23 ALJ ruling requiring Southern California Gas to pay
24 for those expenses; so that's for the record.

25 A couple of other items.

1 SED will be requesting copies of the
2 videotape of today's deposition of Ms. Felts as well
3 as the transcripts of the deposition.

4 And just for the record, we'll note
5 objections as we see appropriate if we -- if we think
6 they're appropriate.

7 But for the record, we -- I'm in receipt of,
8 for Ms. Felts, a copy of her testimony in Southern
9 California Gas Company's and San Diego Gas & Electric
10 Company's Application 1509013, which is her testimony
11 for UCAN, a party that counsel is not present today.

12 And our understanding is that any questions
13 related to that testimony is for the sole and
14 exclusive purpose of the noticed deposition on the
15 Aliso Canyon Order Instituting Investigation and
16 Order to Show Cause, and that anything that Ms. Felts
17 says today should not -- it's not appropriate to use
18 anything she says related to that testimony in a
19 1509013 in that proceeding; so we'll note objections
20 accordingly, but we wanted to make that clear for the
21 record at the outset.

22 MR. STODDARD: Noted.

23 And SoCalGas's response on that is that
24 SoCalGas doesn't waive any right to ask a question
25 about any document or issue within Ms. Felts' scope

1 of knowledge or area of expertise or prior testimony
2 or any other document; however, we note your
3 objection regarding the use of that transcript for
4 purposes of the PSRP proceeding.

5 MR. GRUEN: Your point is noted as well.

6 Thank you.

7 BY MR. STODDARD:

8 Q Okay. Ms. Felts, thank you. I believe we
9 had just gotten through your name and home address.

10 And I had asked whether you had been deposed
11 before and you indicated that you had been. And then
12 I had asked how many approximate depositions had you
13 submitted to, and I don't believe I had an answer to
14 that question. But if I did, I apologize.

15 A And I don't have a number, but it's less
16 than ten.

17 Q Less than ten. Okay.

18 And do you have an approximate number of
19 those where you would have been an expert witness for
20 purposes of the deposition?

21 A All of them.

22 Q Okay. So this isn't new to you, so I'm
23 going to, you know, recount a few kind of rules of
24 the road for the deposition. They will all be
25 familiar to you I'm sure.

1 But first and most importantly, please speak
2 clearly and slowly, and I will try to do so as well.
3 Please respond verbally to any questions.

4 The court reporter can't capture nods or
5 gestures; so make sure that you answer with words,
6 "yes," "no," or otherwise.

7 The court reporter can't capture what we're
8 saying if we're interrupting each other and talking
9 over each other; so please don't interrupt me, and I
10 will try not to interrupt you.

11 Wait until the question is asked before you
12 answer it, and I will wait until you finish your
13 answer if I can before I ask my next question.

14 Also, in general, your attorney may state
15 objections for the record. But you should still
16 answer the question unless you're specifically
17 directed by your attorney not to answer the question.

18 And finally, in terms of breaks, we're going
19 to plan on taking a break, you know, probably
20 approximately at least every hour, but if you need a
21 break at any time, just say so. But please answer
22 any question that was asked prior to taking a break.

23 A Okay.

24 Q And Ms. Felts, are you represented here by
25 counsel today?

1 A Yes.

2 Q And who is your counsel?

3 A Darryl Gruen.

4 Q Thank you.

5 And is Mr. Gruen representing you in your
6 personal capacity?

7 MR. GRUEN: I'm sorry, just to -- maybe to
8 clarify for the record.

9 Is the question whether --

10 Just to clarify maybe you could ask is --
11 whether she is being represented as a witness for SED
12 or personally.

13 BY MR. STODDARD:

14 Q Ms. Felts, today here you are appearing as a
15 witness for SED; is that correct?

16 A Yes.

17 Q And so Mr. Gruen is representing SED and you
18 as a witness for SED, correct?

19 A Yes.

20 MR. STODDARD: Thank you.

21 I'd like to mark Exhibit 1-1.

22 (Deposition Exhibit 1-1 was marked
23 for identification and is attached
24 hereto.)

25 BY MR. STODDARD:

1 Q Ms. Felts, do you recognize this document?

2 A Yes.

3 Q This is a deposition notice asking for your
4 appearance here today; is that correct?

5 A Yes.

6 Q If you can turn to page 3 of the document.
7 Do you see where it asks for documents to be
8 produced?

9 A Yes.

10 Q And the first request is for "All work
11 papers not previously produced to SoCalGas that
12 Margaret Felts generated or relied upon in connection
13 with the above captioned matter."

14 A Yes.

15 Q Do you see that?

16 Did you collect documents in response to
17 that request?

18 A Everything was already provided to you.

19 Q Okay. So would it be accurate to say that
20 we have -- that all work papers that would be
21 responsive to this request have been collected and
22 provided to SoCalGas prior to today's deposition?

23 MR. GRUEN: Let me just note an objection for
24 the record, and I think we had agreed to this, that
25 the definition of "work papers" excludes anything

1 that would be used for future testimony, such as the
2 reply or the rebuttal testimony. And we understand
3 the definition to be qualified in such a way that
4 it's only applying to the testimony that Ms. Felts
5 has produced in this proceeding thus far.

6 MR. STODDARD: Objection noted.

7 I'm going to restate the question and ask
8 that Ms. Felts answer it.

9 Q I'll break it into two different questions
10 though.

11 First, all work papers that were generated
12 prior to service of your opening testimony or SED's
13 opening testimony in this proceeding, were those
14 collected and produced to SoCalGas prior to today's
15 deposition?

16 A Yes.

17 Q Okay. And have you generated additional
18 work papers since then, since service of your opening
19 testimony that were not produced for purposes of
20 today's deposition?

21 MR. GRUEN: Again, I'm just going to object on
22 the grounds that those questions -- questions related
23 to work papers since the production of testimony are
24 protected on the grounds of attorney-client or --
25 and/or work product privilege; so I'm going to

1 instruct the witness not to answer the question, the
2 second question.

3 BY MR. STODDARD:

4 Q Okay. Ms. Felts, question number 2 requests
5 all written testimony or reports that you prepared
6 related to underground storage facilities, correct?

7 A Yes.

8 Q And did you collect and produce any written
9 testimony or reports as requested by that item?

10 A I looked for testimony in the Montebello
11 Storage Unit case, but I don't have that file
12 anymore; so I don't have it. I think I produced
13 testimony at the time. I don't have a copy of it.

14 I also have some documents related to the
15 Playa del Rey case that I worked on. I don't believe
16 a final testimony was ever published in that case. I
17 think it was settled.

18 MR. STODDARD: Thank you very much.

19 All right. I would like to mark
20 Exhibit 1-2.

21 (Deposition Exhibit 1-2 was marked
22 for identification and is attached
23 hereto.)

24 BY MR. STODDARD:

25 Q Ms. Felts, do you recognize this document?

1 A Yes.

2 Q And this is your resume, correct?

3 A Yes.

4 Q This is the resume that you produced to
5 SoCalGas and which you included with your -- with
6 their testimony; is that correct?

7 A Yes.

8 Q I'd like to ask you a few questions about
9 this.

10 First -- the first sentence of this document
11 states that you serve as lead technical consultant to
12 law firms, regulatory agencies and private entities
13 on environmental, energy and corporate fraud cases
14 concentrating on behind-the-scene discovery, research
15 and strategy development.

16 Do you see that?

17 A Yes.

18 Q Are there any current matters aside from the
19 one that we're here for today that you're working on?

20 A Yes.

21 Q Are you able to tell us about those matters?

22 MR. GRUEN: Just note an objection to the extent
23 that they're unrelated and irrelevant to the
24 proceeding at hand, Aliso -- to the Aliso Order
25 Instituting Investigation and Order to Show Cause.

1 But she can go ahead and answer.

2 MR. STODDARD: Yeah.

3 We don't know whether they're relevant or
4 not unless we know what they are.

5 MR. GRUEN: Understood.

6 THE WITNESS: There are two cases that are open:

7 One has to do with a leaking gasoline
8 pipeline owned by an oil company in the east, in
9 Pennsylvania, it's a private matter; so that's about
10 as much as I can tell you.

11 BY MR. STODDARD:

12 Q You said a gasoline pipeline?

13 A Yes.

14 Q Like automotive fuel?

15 A Yes.

16 Q Okay. And you said that's in the east; is
17 that correct?

18 A It's in Pennsylvania.

19 Q And that's a private matter between two
20 corporate entities?

21 A It's between a land owner and the oil
22 company.

23 Q And which party are you working for in that
24 case?

25 A The private --

1 The plaintiff.

2 Q Okay. And are you a consulting expert in
3 that case or testifying expert?

4 A Both.

5 Q "Both." Okay.

6 And you said there was another case?

7 A A small property issue in Northern
8 California having to do with, again, a private land
9 owner and PG&E. I'm representing --

10 I'm the expert for the plaintiff, the land
11 owner.

12 Q Okay. And does that relate to PG&E
13 electrical facilities?

14 A No, it's PG&E gas.

15 Q It's related to PG&E Gas. Okay.

16 Does it involve a gas storage facility?

17 A No. Pipeline.

18 Q Okay. Ms. Felts, I'm going to direct you
19 down to the next section where it says "Specialties."
20 And it says "Discovery and technical strategies for
21 complex cases involving," and then it lists a
22 variety of subject matter areas.

23 Do you see that?

24 A Yes.

25 Q What sorts of discovery and technical

1 strategies do you specialize in?

2 A I write discovery questions, and I help with
3 developing a strategy based on data that has been
4 collected or been provided. I also do research to
5 supplement that with additional information.

6 Q What sort of research?

7 A Technical research or flush out the issues
8 of a case, help attorneys understand technical
9 issues.

10 Q Thank you.

11 Under the next bullet which states "Gas and
12 Electric Utilities regulatory cases," it states
13 "Records Management Assessment" under the first sub
14 bullet there.

15 Do you see that?

16 A Yes.

17 Q What exactly is "Records Management
18 Assessment"?

19 A To do a records review to see if the
20 recordkeeping practices are in keeping with standard
21 or what would be expected in the industry that the
22 case is working in.

23 Q Thank you.

24 The next bullet down -- or two, I'm sorry,
25 skip it, says "Fraud" and then "Incident Assessment."

1 A Yes.

2 Q What do you mean by "Incident Assessment"?

3 A So if there was a spill, say I would do an
4 assessment of the records and the data that resulted
5 from that or transcripts or whatever is -- whatever
6 records are available, and assess the situation from
7 the beginning to the end and probably develop a
8 report to whoever I was working for, usually an
9 attorney.

10 Q Okay. So in the context of incident
11 assessments it would be fair to say that your review
12 or investigation is based on examination and
13 collection and review of records and documents?

14 A Yes.

15 Q And that you would prepare a report or
16 testimony in those cases?

17 A Usually at that level an incident assessment
18 in my mind would occur very early on. When somebody
19 contacts me, I look at what they have.

20 Maybe look at news media or reports or
21 whatever I can -- information is available and then
22 do a short report or -- like an interim report to the
23 attorney that gives them an idea of what I think --
24 what I think the incident information provides and
25 what -- where the case might go on a technical level,

1 not on a legal level.

2 Q All right. Underneath that bullet you see
3 where it says "Pipeline Integrity Assessment"?

4 A Yes.

5 Q Can you explain, please, what do you mean by
6 that in this context?

7 A Well, again, so we're looking at records
8 that have to do with a pipeline and whether or not
9 the condition of the pipeline was sound or if there
10 was an issue with the pipeline that can be identified
11 early on as part of the case.

12 Q Based on the records?

13 A Yes.

14 Q Okay. And for "Underground Gas Storage
15 Assessment"?

16 A Similar. Similar to the pipeline
17 assessment, you just --

18 It's based on record reviews.

19 Q And what are you assessing relative to
20 underground gas storage in that case?

21 A Well, it would depend on what the issue is
22 because they seem to vary quite a bit. But it would
23 be usually some sort of a gas leak from the storage
24 unit. Sometimes a combined environmental issue that,
25 you know, evolves from a complaint from a neighbor or

1 neighborhood or somebody that lives near an
2 underground storage area.

3 Q Okay. Does it include assessment of gas
4 storage wells?

5 A Yes.

6 Q Okay. And in all of these instances, you
7 have four different, or I guess five different items
8 here are described as assessments, "Records
9 Management Assessment, Incident Assessment, Tree and
10 Pole Program Assessment, Pipeline Integrity
11 Assessment," and "Underground Storage Assessment."

12 For each of these, these are based upon your
13 review of records?

14 A Yes.

15 Q So not direct examination of physical
16 evidence?

17 A In the tree and pole program assessment, I
18 actually went out and did physical inspections in
19 some instances.

20 Q Okay. On any of these assessments, do you
21 interview people or witnesses?

22 A Not without an attorney present with me.

23 Q Okay. The next bullet down below that
24 bullet is "Oil & Gas Industry Cases."

25 Are these generally similar to what we've

1 covered in underground gas storage assessment and
2 pipeline assessment, or is this a different category
3 of cases in your view?

4 A This is a category that I have not worked
5 in for quite some time; I would say for at least
6 15 years. Where previously I was doing work in oil
7 price projections, oil price setting or oil and
8 refinery product price setting. There was -- there
9 were quite a few different types of issues that were
10 coming up that I was hired to review or help on. I
11 haven't done that for a long time.

12 Q By "price setting," do you mean price
13 fixing?

14 A Yes.

15 Q Okay. And this related to --

16 Were these regulated oil and gas companies?

17 Or I guess let me restate that. I'm sorry.

18 Does this involve public utilities?

19 A No.

20 Q The next bullet down is "Natural Gas Supply
21 and Demand Assessment."

22 Do you see that?

23 A Yes.

24 Q Can you describe what this work entailed?

25 A Again, this is an area that I haven't really

1 worked that much in recently, but in the 1980s and
2 '90s, I worked quite a bit on that, and it had to do
3 with assessing the available supply of natural gas
4 and forecasting the supply and demand curves.

5 Q And was this related to supply of natural
6 gas regionally?

7 A It was supply of natural gas within the
8 United States, and it would have included Mexico.

9 Q Okay. So this was kind of a broad market
10 analysis?

11 A Yes, because your pipeline is connected. I
12 mean, the supplies cross borders; so it can't be just
13 California. It would have to be nationally and in
14 some instances international.

15 Q Because the natural gas pipeline system is
16 integrated?

17 A Yes.

18 Q Kind of almost at the continental level?

19 A Yes.

20 Q And so a significant natural gas resource or
21 piece of infrastructure is impacted by even
22 relatively far flung demand across the country; is
23 that correct?

24 A Well, I don't know if you have far flung
25 demand. And the demand curves turn out to be fairly

1 consistent from one year to the next.

2 But there was a period of time when there
3 were some entities who believed that either natural
4 gas demand was going to go way up or way down, and so
5 there would be a call for some sort of a forecast.
6 And this is early -- probably before the year, I want
7 to say 2000, because sometime around 2000, 2004 the
8 Energy Information Administration stepped in and
9 started providing some pretty good sound information,
10 data, and forecasts that people could access easily.
11 And it was easier for me to give people a link to
12 that than to try to generate my own forecasts; so
13 that demand for that work diminished.

14 Q The next bullet down is "Groundwater
15 Contamination."

16 Can you please explain the work that you've
17 done in that area?

18 A In the 1990s -- approximately 1990 to about
19 2000, I had an environmental company with employees,
20 and we did environmental assessments and
21 investigations, mostly having to do with groundwater.

22 And then year -- some time around 1998 to
23 about 2002 I did a research project for Lloyds of
24 London. And the basic question was who knew what,
25 when about groundwater contamination in California

1 primarily, but it ended up extending throughout the
2 United States.

3 And that review, I researched records back
4 to I think it was 1895 and forward and developed a
5 huge database about groundwater contamination.

6 Q So was the work that you were doing on
7 groundwater contamination records-based work or was
8 it field work?

9 A It was --

10 So the work that I did as a consultant was
11 field work. We actually drilled and constructed
12 groundwater monitoring systems. The research for
13 Lloyds of London was records-based.

14 Q Okay. And was the groundwater contamination
15 work you did particular to energy?

16 A No.

17 Q Okay. The next item you have on the list is
18 "Hazardous waste disposal and site cleanup," with sub
19 bullets for "CERCLA, RCRA" and "Underground Storage
20 Tanks."

21 Do you see that?

22 A Yes.

23 Q What types of underground storage tanks did
24 this concern?

25 A Gasoline, diesel, and anything else that was

1 in a tank below the ground.

2 Q Okay. This does not relate to natural gas
3 storage fields, however --

4 A No.

5 Q -- correct? Okay.

6 All right. Moving over to your employment
7 history. The first item that you identify is
8 "Litigation Consultant 1983 - Present."

9 Do you see that?

10 A Yes.

11 Q I would note that that period of time
12 overlaps with a number of other positions listed on
13 your employment history.

14 A Yes.

15 Q Did you work both as a litigation consultant
16 at the same time that you were employed by others?

17 A Yes. During that period of time there was
18 only a -- there was a period of about five years when
19 I worked for the California Communications
20 Association when I was not working any active
21 litigation cases. I had a couple that were sort of
22 in remission that came alive later, but I wasn't
23 working on them during that five years.

24 Q Was there any particular reason why you
25 didn't take on cases during that period of time?

1 A Well, no particular reason. I think I was
2 just busy doing work with the telephone companies and
3 the association.

4 Q Okay. The next item down the list --
5 So we just discussed the California
6 Communications Association.

7 From 1995 to 1997 you were a senior
8 consultant for Dames & Moore; is that correct?

9 A Yes.

10 Q And what was your role there?

11 A I was just an engineer. I ran an
12 engineering group in Northern California. We worked
13 cases -- I worked cases in Washington state and
14 Northern California. My team worked other cases in
15 mostly Northern California, some in San Francisco,
16 Bay area cases.

17 Q What sorts of engineering?

18 A Well, some were -- some of it was
19 environmental engineering. There was air emission
20 cases. There was groundwater cases.

21 Q Okay.

22 A There were permits that were being applied
23 for having to do with complicated construction.

24 Q Okay. The next item down says --

25 MR. GRUEN: I'm sorry, I just want to clarify.

1 Are you finished answering that question?

2 THE WITNESS: Yes.

3 MR. GRUEN: Okay.

4 BY MR. STODDARD:

5 Q The next item down shows that from 1993 to
6 1995 you were the Deputy Director at the California
7 Department of Toxic Substances Control; is that
8 correct?

9 A Yes.

10 Q Can you describe your work there during that
11 time period?

12 A I was in charge of the statewide site
13 mitigation program; so we handled oversight of
14 Superfund sites, state equivalent of Superfund sites.
15 So those would be all funded and handled with -- by
16 my team.

17 And then we had oversight over all of the
18 hazardous waste site mitigation or cleanup,
19 investigation and cleanups by private parties that
20 were over -- you know, overseen by the state. And
21 then I had an emergency management -- or emergency
22 response group that handled response to emergencies
23 that involved hazardous waste.

24 For instance, if a storm came in and washed
25 a bunch of propane tanks down a river, we would go

1 out and deal with the problem. It was on-site work.
2 And we also handled all of the drug lab cleanups.

3 Let me think.

4 We had a geologic group that did geologic
5 assessments for site -- contaminated sites.

6 Q Did any of that work, as you recall, relate
7 to natural gas facilities or natural gas?

8 A So if there was a complaint that came in for
9 exposure to natural gas, we would have a team respond
10 to it.

11 But typically anything having to do with a
12 natural gas storage would be deferred to the lead
13 agency, which would probably be the Public Utilities
14 Commission or the Division of Oil and Gas. But we
15 might join a team for an assessment on a site.

16 Q Do you recall any specific such cases?

17 A No, not offhand.

18 Q Your tenure there was fairly short, for two
19 years.

20 Was there any particular reason that you
21 left after two years?

22 A It was a political appointment.

23 Q Similarly your tenure at Dames & Moore was
24 from 1995 to 1997.

25 Was there any particular reason that you

1 left that position after two years?

2 A They offered me a job, and I was in
3 transition back from a political appointment to a
4 consulting firm, and they agreed that I could sort of
5 ride on their coattails while I made that transition;
6 so I went to Dames & Moore. I pulled my old clients
7 and worked to shift back out.

8 Q Okay. Jumping down to Division Chief of
9 Engineering under the Department of Defense McClellan
10 Air Force Base, 1985 to 1990.

11 Do you see that?

12 A Yes.

13 Q Can you please tell us a little bit about
14 that work?

15 A Okay. So McClellan Air Force Base had a
16 very bad contamination problem. It's an Air
17 Force/Army flight depot, and for years they had been
18 discarding all of their chemical waste into big pits
19 on the west side of the base.

20 So they were challenged with trying to do
21 something about cleaning up that when it started
22 contaminating groundwater wells west of the base.
23 And they hired me to come on initially to consult
24 with them about what to do about the groundwater
25 contamination.

1 They immediately offered an employment
2 position, which turned in to a job of not only
3 dealing with the immediate problem but of developing
4 a model environmental program for the Department of
5 Defense; so I helped them set that up. And I started
6 in the Superfund side.

7 I got that going, and I moved over to the
8 RCRA program and implemented that. Then I was in
9 charge of the air emissions program in addition to
10 RCRA; so basically I was writing and developing
11 programs to put that in place. And then that was --
12 that program was proliferated to the rest of the
13 depots and later to the rest to the Department of
14 Defense facilities.

15 Q Okay. And did that job have any involvement
16 with natural gas infrastructure facilities?

17 A No.

18 Q The next item down is "Environmental
19 Contractor Invictus Corp." There is no time period
20 for this.

21 Do you have a time period?

22 A That was my own company. 1982 to '85.

23 Q And this is the -- is this the same company
24 that you were referring to when we were discussing
25 groundwater contamination work under "Specialties"

1 before?

2 A Yes. And it had another name. It was --
3 seems like it started out as Clemen Environmental
4 Services and may have continued to exist during the
5 time I was at the Department of Defense.

6 Q The company continued to exist?

7 A Yes.

8 Q So this is a company you started and then
9 left when you joined the Department of Defense?

10 A Well, I mean it was my own company.

11 So if you look at this, it started in
12 1993 as Clemen Environmental Services, and then I
13 continued to carry contracts, consulting contracts,
14 including with the PUC while I was at McClellan at
15 the Department of Defense.

16 Q I'm sorry, can you slow down for one moment.
17 I think you said you see where it references Clemen
18 in 1993. And I don't see --

19 Forgive me if I'm missing it, but I don't
20 see where you're pointing to on the document.

21 A I'm sorry, Deputy Director 1993 to 1995.

22 Q Yes.

23 A Okay. So Division Chief of Engineering is
24 1985 to 1990 so there is a three-year period in
25 there. That was also an active environmental period

1 which would have been under Invictus Corporation.

2 Q Okay. So --

3 A So I'm saying, okay, let's --

4 The starting date for Clemen Environmental
5 Services, which is Invictus Corporation, because that
6 was before it was incorporated, is 1983. And so if
7 you put 1983 to 1993, that would be the period of
8 time that the dates that would go behind Invictus
9 Corporation.

10 Does that make sense?

11 Q So just to confirm, the dates that should go
12 immediately to the right of the environmental
13 contract line should be 1983 to 1993?

14 A I think that's the best.

15 Q Okay. And the Invictus Corp work continued
16 for a period of three years while you were also
17 Division Chief of Engineering for the Department of
18 Defense?

19 A Yes.

20 Q Okay. And you indicated that you had
21 contracts with the PUC?

22 A Yes.

23 Q That was with Invictus?

24 A The contract itself was either with Clemen
25 Environmental Services or Invictus. I actually don't

1 remember the date of the incorporation for that and
2 the name change. But it's all the same thing. It
3 was a private company that was then incorporated in
4 the State of California and then the name --

5 Q How do you spell Clemen?

6 A C-L-E-M-E-N.

7 Q So Clemen is not identified on here.
8 Invictus Corp is.

9 But Invictus Corp and Clemen are one and the
10 same?

11 A Yes.

12 Q How many appointments did you have with the
13 California Public Utilities Commission approximately?

14 A Well, let's first finish the dates on that
15 one.

16 So you had to 1993, and then I picked it up
17 again in 1997 to about 2004; so add those dates to
18 the line outside of environmental contractor. And
19 the number of PUC cases, I've never counted those.

20 Q Approximate, would you say it was, you know,
21 more than 20 contracts?

22 A I'd say it's right around 20.

23 Q Okay. And all of these contracts related to
24 groundwater contamination matters?

25 A No. They -- they were across the board; so

1 there was a gas plant case, a coal-fired power plant,
2 Helms power plant, which is water storage.

3 There were three fraud cases involving
4 utilities. There was tree trimming case and pole
5 maintenance. There were two underground storage
6 cases, which was Montebello and Playa del Rey.

7 Q So I apologize, I don't mean to interrupt,
8 Ms. Felts.

9 But just to summarize, because I think we
10 will get into some of this in a moment. But to
11 clarify, because I hadn't appreciated this before,
12 the contracts between Invictus and PUC were for
13 expert services?

14 A Yes.

15 Q So it wasn't related to engineering work
16 specifically, engineering services related to the
17 groundwater contamination?

18 A No.

19 Q Okay. But Invictus also did that work?

20 A Yes.

21 Q Not for the PUC?

22 A Yes.

23 Q Okay. Was any of --

24 Do you recall any of the contracts with the
25 PUC for Invictus being for work other than expert

1 consulting or testifying services?

2 A No.

3 Q Okay. Thank you.

4 Next item down briefly, do you recall the
5 tenure and the dates for "Energy Specialist" at the
6 "California Energy Commission"?

7 A I think I was there from 1980 to 1983, I
8 think. Late '80 to '83, early '83.

9 Q And what was your role as an energy
10 specialist?

11 A I was in charge of the group -- I don't
12 remember the name of the group. It was in -- it was
13 the fuels office, and I was in charge of natural gas
14 and refining forecasts.

15 Q This was forecasting work related to supply
16 and demand?

17 A Yes.

18 Q So this did not relate to energy
19 infrastructure integrity?

20 A No.

21 Q Or to particular incidents?

22 A No.

23 Q Okay. Next item down it identifies you as a
24 process engineer for Celanese -- apologies if I
25 mispronounce this, Celanese Plastics and Specialties?

1 A Yes.

2 Q What did you do as a process engineer?

3 A I was one of two engineers at a plant in
4 West Texas, Vernon, Texas that manufactured guar
5 powder, which was produced in mass specially for the
6 oil industry for fracking.

7 Q What was your specific role with respect to
8 the production of guar?

9 A Well, it was an interesting process plant
10 where we -- I had to grind a bean basically -- guar
11 is an agricultural product, and we had to grind it
12 into a dry powder; so in the meantime in order to get
13 the properties that were required of that powder as
14 an end product, it had to go through a reactive
15 process where there was a chemical reaction to give
16 it those properties.

17 So I was in charge of the process from front
18 to end to get that to happen and just day-to-day
19 engineering problems at the plant. And also handled
20 environmental problems related to their waste
21 treatment and air emissions.

22 Q And how many years were you in that
23 position?

24 A About two.

25 Q And finally it appears that you were a

1 process engineer for Amoco Oil Company in Yorktown.
2 Is that Yorktown, Pennsylvania?

3 A Virginia.

4 Q "Virginia"?

5 What did you do as a process engineer for
6 Amoco?

7 A Again, worked a variety of refining
8 engineering projects; so I was trained to run their
9 linear program on the major -- on the mainframe,
10 which was linked to I think Whiting.

11 Anyway, they had five refineries so the
12 mainframe linear program was set up so that all of
13 the oil movements that went from one refinery to the
14 other and the production of the products was
15 coordinated.

16 And so I was in charge and spent a lot of my
17 time managing the inputs and outputs of the refinery
18 and making sure that those specs of the products met
19 the requirements for the outgoing demand; so we had a
20 large product slate. It was a full-fledged refinery,
21 and everything had to balance. And then also dealt
22 with the blending of crude oils, because at that
23 refinery we were using both domestic crude and
24 foreign crude. And so it was an interesting project.

25 Q And how long were you in that position?

1 A About three years.

2 Q Okay. And was that your first job out of
3 graduate school?

4 A Out of engineering school.

5 Q Out of engineering school.

6 What year do you recall you would have
7 started that? Would it be '70 -- mid-'70s?

8 A 1977.

9 Q Okay. And then below that we see
10 "Education," and it appears that you are an attorney,
11 and you got your law degree from the Pacific McGeorge
12 School of Law; is that correct?

13 A Yes.

14 Q And you got your MS in energy environmental
15 engineering from LaSalle?

16 A Yes.

17 Q Are there any other degrees that aren't
18 listed on here?

19 A No. I have a certification in linear
20 programming.

21 Q Certification, any other certifications we
22 should be aware of?

23 A No.

24 Q Any other certifications at all?

25 A I have a general engineering license that is

1 not on there. It's currently on hold with the State
2 of California.

3 Q What does that mean?

4 A It means I pay less because I'm not using
5 it; so it still could be activated in a day if I went
6 down and paid them the extra money.

7 Q Do you have an engineering license that is
8 active in another jurisdiction?

9 A No.

10 Q Okay. Are you --

11 It identifies you as having a Washington
12 State Bar number.

13 Is that active or is that inactive?

14 A Active.

15 Q Active.

16 And you're a member of the Phi Delta Phi
17 International Legal Fraternity. Is that a membership
18 or an honor?

19 A It was an invitation. I have a lifetime
20 membership in it. It's --

21 Q Impressive.

22 All right. Turning to the next page, and
23 we'll touch on a few of these but not all.

24 First question is the first case here
25 identified "2018 - 2019 Oil Company Pipeline Leak,

1 Client: Private Law Firm."
2 A Yes.
3 Q Is this matter concluded in 2019?
4 A No. It's still open.
5 Q It's ongoing. Okay.
6 And is this the same matter -- no, this is
7 an oil pipeline not gasoline.
8 A It's the same matter.
9 Q It's the same matter?
10 A Yes.
11 Q So this is a gasoline company pipeline leak?
12 A It's an oil company that owns a gasoline
13 pipeline. They own other pipelines too.
14 Q All right. And are you able to tell us who
15 the private law firm is?
16 A No.
17 Q Okay. Below that, "2016 - 2018 PG&E General
18 Rate Case FERC Docket." I won't read the docket
19 number there.
20 Do you see that there?
21 A Yes.
22 Q And your client on this is the California
23 Public Utilities Commission?
24 A Yes.
25 Q Is this related to --

1 Is this a PG&E electric grate case?

2 A No. It's the San Bruno case.

3 Q This is the San Bruno case.

4 And this case concluded?

5 A Yes.

6 Q And what was your work in this case?

7 A I was the expert witness on a records

8 case -- records-related case.

9 Q And you submitted testimony before FERC?

10 A No.

11 Oh, wait. Are we looking at the same --

12 Q The first item under 2016 to 2018, second

13 item on the page. It shows "FERC Docket

14 No. ER 16-2320-000."

15 A This looks like an error in my --

16 Q Is that a mistake?

17 A I think that's an error. I don't remember a

18 FERC docket on San Bruno.

19 Q Could you please correct your resume and

20 send us a corrected one at your convenience?

21 A Okay. Just a minute.

22 Q The next item down is "SDG&E CPCN For

23 Pipeline Reliability and safety project."

24 Do you see that?

25 A Yes.

1 Q And this identifies your client as UCAN?

2 A Yes.

3 Q And you are UCAN's expert witness; is that
4 correct?

5 A Yes.

6 Q And this is an ongoing matter?

7 A Yes. I am -- can I correct --

8 I am no longer on that case because UCAN, I
9 don't believe, continued in the case. I don't think
10 they're an active participant in it right now; so
11 they paid me my final payment at the end of the first
12 phase.

13 Q Which was when?

14 A It would have been in -- I think it actually
15 ended in the end of 2017, if I recall, and I received
16 my final payment in 2018.

17 Q Okay. And you prepared testimony that was
18 served in that case, correct?

19 A Yes.

20 Q All right. The next item down says "2014 -
21 2016," and the first item is United States versus
22 Pacific Gas & Electric Company, and it indicates it
23 was related to the San Bruno pipeline explosion
24 criminal case; is that correct?

25 A Yes.

1 Q And that your client there was the United
2 States Department of Justice; is that correct?

3 A Yes.

4 Q Were you --
5 What was your role in that case?

6 A I was a consulting expert, and I helped
7 review records and developed discovery.

8 Q Okay. On any particular scope of issues?

9 A It was San Bruno. It was just having to do
10 with recordkeeping and technical issues having to do
11 with the pipeline explosion.

12 Q Okay. What sort of technical issues beyond
13 recordkeeping?

14 A I reviewed some of the documents having to
15 do with the original installation and maintenance of
16 the pipeline and maybe some inspection records.

17 Q Thank you.

18 The next item down identifies an application
19 ATCO Pipelines, "Urban Pipeline Replacement Project,
20 Client: ATCO."

21 A Uh-huh, yes.

22 Q Who is ATCO?

23 A It's a gas utility in Canada. And their
24 offices are in Calgary, I believe.

25 Q And who was this proceeding before?

1 A It would have been the equivalent of the
2 Public Utilities Commission only in Alberta.

3 Q Okay. And this matter is now concluded?

4 A Well, my contract is concluded on that. I
5 don't know if the case actually closed yet.

6 Q Okay. And what was your role in that case?

7 A Okay. Let's see, the pipeline company
8 wanted to get approval to put in a new pipeline that
9 would be installed in a utility corridor around the
10 city and take out of service existing gas lines in
11 the city that were in -- buried in streets that were
12 lined with housing now. And then they wanted -- they
13 were not going to abandon that service.

14 They were going to de-rate the lines that
15 were providing service within the city to the low
16 pressure service. And so they were asking for my
17 help in convincing the public sector there that it
18 would be a good idea to move the high pressure gas
19 service to a corridor rather than having it run under
20 their homes.

21 Q And so you were a testifying expert in that
22 case?

23 A Yes, for The Gas Company.

24 Q And you served testimony?

25 A Yes.

1 Q Okay. Next item down 2011 to present OII,
2 1.11-02-016 related to the San Bruno explosion. This
3 appears that your role is ongoing.

4 What is the ongoing work that you're doing?

5 A No, it's not ongoing. Old. This is done.

6 Q When did it --

7 When was it completed?

8 A 200- -- 2018.

9 Q Okay. Can you please add that to the list
10 of corrections to your resume?

11 Jumping down to the bottom of this column,
12 where it says "Playa del Rey Gas Storage Integrity
13 SoCal Edison" --

14 A Yeah, that's an error. I knew about that.

15 Q So that should say SoCalGas?

16 A Yes. I'll correct that.

17 Q And the description is "Research and
18 evaluation of data related to the operations,
19 maintenance integrity of the Playa del Rey gas
20 storage facility and the proposed sale of surface
21 property."

22 And your client was the California Public
23 Utilities Commission Division of Ratepayer Advocates;
24 is that correct?

25 A Yes.

1 Q Can you please describe a little bit the
2 scope of your work in this matter?

3 A It was, again, a records review, and there
4 was --

5 It was probably a reasonableness case where
6 the Gas Company was asking for some money to cover
7 some costs, and as I recall, there may have been a --
8 yes; so there was a proposed sale of surface
9 property, and they wanted to -- the PUC wanted an
10 assessment of what the sale of the property would
11 involve as far as technical issues related to gas
12 storage.

13 And there was also an environmental
14 component of this having to do with contamination in
15 Ballona Creek, I think; so I did an interim or a --
16 you know, an initial assessment for the Public
17 Utilities Commission, and that's the case that I said
18 I think must have settled because I don't recall a
19 final testimony in that case.

20 Q So as you recall, the case settled prior to
21 testimony?

22 A I --

23 Yes, I'm sure I didn't testify in that case.

24 Q Okay. And do you recall what the specific
25 integrity issues were that you researched and

1 evaluated?

2 A There was --

3 There were some complaints of leakage of
4 natural gas from wells.

5 Q Okay. So you reviewed those complaints and
6 related records?

7 A Records, historical records having to do
8 with the storage unit; so there was a few rounds of
9 discovery. I had quite a few gas documents to review
10 from the utility.

11 And then I did independent research on the
12 groundwater contamination or groundwater issues.
13 Seems like there was a -- somebody who complained or
14 thought that the gas was coming from a storage unit
15 up through the creek.

16 It was a private resident who was out there
17 counting bubbles in the creek and then filed a
18 complaint. And so I did some research into prior
19 contamination in the creek that could have been
20 causing that.

21 Q Did you determine whether or not it was
22 being caused by prior contamination in the creek?

23 A My -- I think --

24 As I recall my assessment was that it wasn't
25 coming from the gas storage unit.

1 Q Okay. And in terms of the reference to
2 integrity here, did it -- it didn't relate
3 specifically to SoCalGas well integrity monitoring
4 practices?

5 A No, not -- excuse me, not integrity
6 monitoring that I can recall.

7 There was a problem with one or more wells
8 leaking, and I recall one of the wells actually was
9 vented up through a house, which was crazy. Without
10 being able to look back at data, which I don't have
11 anymore, I can't really tell you much more. I'm just
12 telling you what I remember.

13 Q What you recall. Okay, thank you.

14 All right. Jumping to the next column, do
15 you see where it states "Application of SoCalGas
16 Company to sell its storage field in Montebello,
17 California, pursuant to Public Utilities Code
18 Section 851"?

19 A Yes.

20 Q And then it says "Evaluation of technical
21 data related to the integrity of the Montebello gas
22 storage field."

23 And your client again there was the Division
24 of Ratepayer Advocates?

25 A Yes.

1 Q Were you a testifying expert in this case?

2 A I filed testimony.

3 Q You served testimony that you were not able
4 to locate?

5 A Yes.

6 Q For purposes of producing it for today's
7 deposition; is that correct?

8 A Yes.

9 Q Do you recall whether it was multiple rounds
10 of testimony?

11 A I expect there was a rebuttal.

12 Q Okay.

13 A But I don't remember actually testifying in
14 that case, and I don't -- testifying at the hearings.
15 I don't know if there were hearings and the case --

16 My part, my evaluation of it was evaluation
17 of storage unit data and leakage; so the gas storage
18 facility was leaking.

19 Q Okay. Do you recall whether these were
20 operational or abandoned wells?

21 A What I recall about my part of -- my study
22 of it was not that it was leaking through wells,
23 which it may have been, but that the storage unit
24 itself was leaking. In other words, the geology
25 wasn't containing the gas.

1 Q So integrity here refers to reservoir
2 integrity, not well integrity?

3 A That's correct.

4 Q Okay. Thank you.

5 You identify a number of other cases on your
6 resume.

7 Are there any others that relate to gas
8 storage that you see here?

9 A No.

10 Q Okay. Ms. Felts, you don't identify any
11 publications on here.

12 Do you have any publications or articles?

13 A I have a list somewhere. They're really
14 old. I haven't published anything other than
15 testimonies for a long time.

16 Q Do any of those publications as far as you
17 recall relate to gas storage?

18 A No.

19 Q Okay. Ms. Felts, you've been a testifying
20 expert in a number of disputes including regulatory
21 and civil proceedings, correct?

22 A Yes.

23 Q And the civil proceedings include both
24 arbitrations and testimony in court?

25 A Yes.

1 Q Have your qualifications as an expert ever
2 been rejected?

3 A No.

4 Q Ms. Felts, we identified a number of
5 inaccuracies in this resume.

6 MR. GRUEN: Objection. To the characterization
7 of "a number of inaccuracies" --

8 But she can answer.

9 BY MR. STODDARD:

10 Q Okay. Ms. Felts, we identified inaccuracies
11 related to items on page 2 of your resume, related to
12 the PG&E FERC docket under 2016 and 2018,
13 identification of the utility in connection with the
14 Playa del Rey storage integrity item, as well as on
15 the first page an incomplete account of the tenure
16 for Invictus Corp.

17 Based on our discussion there should also be
18 time periods between Dames & Moore and the California
19 Communications Association and potentially between
20 the Department of Defense, McClellan Air Force base
21 and the Department of Toxic Substances Control.

22 Do you agree?

23 A Do you want me to add dates to make this
24 more consistent on the front page with the time
25 schedule? In other words, you want me to insert

1 environmental into the periods?

2 Q Well, what I would like is a complete
3 accounting of your employment history, and based on
4 our questioning a few moments ago, it sounded like
5 there were interim periods of time where your own
6 company, Invictus Corp or Clemen Energy Services,
7 there were tenures -- there are periods of time for
8 work you did with Invictus that should be listed here
9 between other positions.

10 A Okay. So when I wrote this, I tried to make
11 it easier by putting litigation consultant 1983 to
12 present to cover that because all of those interim
13 periods I was doing litigation work.

14 So, I mean, I can rewrite it so that it
15 covers all date periods.

16 Q If you could clarify and confirm that that's
17 accurate, we would appreciate it. And then make the
18 corrections that we discussed on page 2, and then
19 please confirm whether this is otherwise complete and
20 accurate.

21 As you sit here today, to your knowledge, is
22 this otherwise a complete and accurate record of your
23 employment history and testifying experience and
24 education?

25 A Yes. I looked at it, and I don't think

1 there are any more -- any other errors.

2 The one I spotted was the Playa del Rey.

3 I didn't notice that I needed to fix the
4 date on the OII.

5 And the FERC case, I have to -- I have to
6 look up the number because I just don't remember what
7 that is.

8 But I'll fix it.

9 Q Thank you.

10 Yes, so to confirm, as you just noted, it is
11 three items on page 2 related to the date of the
12 San Bruno investigation, the FERC docket and the
13 Playa del Rey storage field.

14 A Right.

15 Q All right. Thank you very much.

16 Ms. Felts, do you have any operational
17 experience with gas storage fields?

18 A No.

19 Q Have you ever worked for a gas storage
20 operator?

21 A No.

22 Q Have you ever done engineering work for a
23 gas storage operator?

24 A No.

25 Q Do you have any experience related to the

1 design or configuration of gas storage wells?

2 A Not directly, but the design and
3 configuration of wells in general is not so
4 different.

5 Q What experience do you have with the design
6 and configuration of wells generally?

7 A I have designed and drilled water wells for
8 groundwater monitoring and --

9 Well, that's all for generally.

10 Q Okay. And how deep are those wells usually?

11 A I think the deepest one was actually -- was
12 probably about -- I'm trying to think, about 400 feet
13 shallow wells.

14 Q And do they have surface casings?

15 A Yes.

16 Q And production casings?

17 A Yes. Depending on what you're drilling
18 through, you have to design it properly so that you
19 isolate the different sands or lenses, clays; so it
20 just depends on what you're drilling through how you
21 design the well.

22 Q And do they have tubing and packer
23 configuration?

24 A Generally not necessary; however, I did
25 study drilling in engineering school.

1 Q Okay. And when you say you studied
2 drilling, you studied gas storage well design and
3 configuration?

4 A Gas and oil -- oil and gas well drilling.

5 Q So gas production?

6 A It would be gas production, yes.

7 Q Okay. Do you have experience with gas
8 storage well integrity monitoring?

9 A Not sure what you mean by that.

10 Q Well, in your testimony you have discussion
11 about well integrity monitoring, correct?

12 A Say that again.

13 Q In your testimony you address SoCalGas's
14 well integrity monitoring programs; is that correct?

15 MR. GRUEN: Just for clarification, when you're
16 going to be asking about testimony, can the witness
17 be directed where in the testimony she is being
18 asked?

19 MR. STODDARD: Yeah. We can circle back on
20 that.

21 Q Ms. Felts, what is your understanding of the
22 phrase "well integrity monitoring"?

23 A I think that is a phrase that either or both
24 SoCalGas and Blade used.

25 So my understanding of it, it's the

1 monitoring of the well for -- to make sure that it is
2 not leaking or has not lost wall thickness from
3 corrosion or erosion, and is behaving or -- as
4 intended.

5 Q Okay. And do you have experience with that
6 process? Have you personally performed well
7 integrity monitoring?

8 A Well, that's kind of a weird question
9 because well integrity monitoring, although you would
10 have to have field testing to do, you would -- the
11 monitoring itself would be a matter of record
12 assessment.

13 So data assessment. So you would hire
14 someone to come out and run the tests on the well.

15 An engineer would look at the results of the
16 test, and I would guess that the integrity monitoring
17 aspect of it would be on the engineering side where
18 you would be evaluating the data that was generated
19 from the well. And the engineer could call for the
20 tests, and my experience would be in reviewing data.

21 Q What sort of tests are you referring to?

22 A Well, could be logs of the well, various
23 types.

24 Could be a -- the use of a tool like a USITs
25 I think they call it now, to determine the wall

1 thickness of the well.

2 Could be a temperature survey, a noise
3 survey, they also have some tests for erosion,
4 involves --

5 Q And do you have experience interpreting
6 casing inspection logs prior to your work in this
7 matter?

8 A Yes.

9 Q What was that experience?

10 A I've looked at casing inspection logs in a
11 number of cases in the past where there were issues
12 of groundwater contamination, and it would be related
13 to an oil production well or a --

14 I can't remember a gas production well. I
15 think only oil.

16 Q Do you recall what sorts of casing
17 inspection logs, what the tool was?

18 A What the tool was?

19 It was a tool that would monitor -- it would
20 measure the wall thickness of the pipe, the casing.
21 Typically that would be what I would look for.

22 MR. GRUEN: I'm sorry, I'm just noting just for
23 timing sake, we can keep going, but I'm wondering if
24 you have an idea when you might like to break.

25 MR. STODDARD: We can take a break after

1 probably another 10 minutes.

2 MR. GRUEN: Does that work for you?

3 Okay.

4 BY MR. STODDARD:

5 Q So your interpretation -- I'm sorry, again.

6 Do you recall the types of tools that were
7 used in that specific instance related to the oil
8 production well?

9 A I'm going to say that it was similar to the
10 USIT one that SoCalGas is using, but I don't remember
11 the name of the tool.

12 Q Okay. Any other experience interpreting
13 casing inspection logs?

14 A Not that I recall just offhand, no.

15 Q And in interpreting the -- in interpreting
16 the casing inspection log in that instance, do you
17 recall being present at the time that the log was
18 run?

19 A I have never been present when a log was run
20 on an oil or gas well.

21 Q Okay. Do you recall communicating with
22 the wire line operator about running the tool that
23 resulted in a log that you interpreted?

24 A No.

25 Q Okay. And do you recall approximately when

1 that was that you interpreted the log related to the
2 oil production well?

3 A I recall that there was more than one well
4 that I did this on, and I -- I'm going to say it's
5 probably during the 1990s. I don't have a date.

6 Q Okay. And again, this was based entirely on
7 review of the records?

8 A Yes.

9 Q Okay. Do you have any experience with
10 microbially influenced corrosion?

11 A Yes.

12 Q Can you please describe your experience?

13 A It has to do with underground storage tanks
14 that leaked, pipelines that leaked, everything
15 underground exposed to groundwater that I was
16 requested to look at that leaked.

17 Q So you have experience with it in a number
18 of cases?

19 A Yes.

20 Q Do you recall --

21 Did you perform any testing or analysis
22 related to MIC?

23 A No.

24 MR. GRUEN: Just for the record, "MIC" is what
25 is the --

1 BY MR. STODDARD:

2 Q I'm sorry, I'm using the phase "MIC" as the
3 acronym for microbially influenced corrosion.

4 A Yes.

5 Q Did you perform any testing or analysis
6 related to MIC?

7 A No.

8 Q Okay. Finally, Ms. Felts, do you have any
9 experience with well-control or well-kill operations?

10 A No.

11 Q Ms. Felts, do you have any experience
12 with --

13 You're an attorney, correct?

14 A Yes.

15 Q Have you ever been involved in a discovery
16 dispute as an attorney?

17 A No.

18 Q "No"?

19 Have you ever been involved in a privilege
20 review?

21 Do you understand what I mean by "privilege
22 review"?

23 A Yes.

24 MR. GRUEN: I'm going to just --

25 THE WITNESS: Only as a side --

1 You know, I'm a consultant, there is a
2 privilege review issue, but I'm not the one that gets
3 involved in settling it.

4 BY MR. STODDARD:

5 Q So as an attorney, you've never overseen a
6 privilege review?

7 MR. GRUEN: All right. For the record, I'm just
8 going to note an objection as to relevance in asking
9 her about her role as an attorney here.

10 But she can answer the question.

11 MR. STODDARD: The relevance is her testimony
12 asserts violations related to privilege; so I'm
13 asking her about her scope and experience and
14 knowledge related to the subject matter.

15 THE WITNESS: I'm familiar with the subject
16 matter. It's generally not my responsibility as a
17 technical consultant.

18 BY MR. STODDARD:

19 Q Okay. So you've never prepared a privilege
20 log?

21 A I don't think that's true. I think I
22 probably have prepared one in the past.

23 Q You've prepared a privilege log as an
24 attorney?

25 A No, as a technical --

1 Q You've prepared a privilege log as a
2 technical consultant?

3 A Yes. I mean, this is a matter of
4 identifying records, and the condition -- the --
5 whether or not the records are privileged, and if
6 someone asked me to prepare a log, I could prepare
7 the log.

8 Q So in that context of preparing a log as a
9 technical consultant, you assess the privilege and
10 then you designate the documents accordingly?

11 A I don't have to usually assess the privilege
12 because it's usually already assessed before I get to
13 it. Someone has already claimed privilege.

14 Q And then in reviewing the documents you add
15 them to the log and determine that they fall within
16 the scope of the privilege claim?

17 A Yes. Or I sort -- sort a stack of them and
18 say these are privileged and these are not.

19 Q Ms. Felts, can you briefly describe your
20 experience with PUC enforcement investigations, prior
21 experience with PUC enforcement investigations?

22 A I guess I would have to look back at my
23 resume to see who it was that I was working for on
24 the different cases.

25 Q Let's do that briefly, and I'll make it

1 quick, Exhibit 1-2.

2 First on page 2 of Exhibit 1-2, the
3 OII related to San Bruno, was that an enforcement
4 investigation?

5 A Yes. Yes, it was.

6 Q Okay. Next down, the Playa del Rey gas
7 storage integrity case at the bottom of this page,
8 was that an enforcement investigation?

9 A That was Division of Ratepayer Advocates, so
10 I would say no. That was a reasonableness case.

11 Q And it was related to a sale of property?

12 A Yes.

13 Q And then the next item on the next page, the
14 application of Southern California Gas Company to
15 sell the Montebello gas storage field, that also was
16 an application for a sale of an asset, correct?

17 A Let me see, Montebello.

18 Q This is on page 2 of your resume in the
19 second column.

20 A Oh, okay. Okay. That was also for the
21 Division of Ratepayer Advocates, so that would have
22 been a reasonableness review.

23 Q And it says there it's an application,
24 correct?

25 A Yes.

1 Q Okay. Have you ever worked as an attorney
2 in a regulatory investigation?

3 A No.

4 MR. STODDARD: All right. Thank you.

5 We can take a break.

6 THE VIDEOGRAPHER: Just a moment, please.

7 This is the end of disk number one,
8 Volume Number 1, of the deposition of Margaret C.
9 Felts on February 5th of the year 2020.

10 We are off the record at 10:55 a.m.

11 (Off the record.)

12 THE VIDEOGRAPHER: This is the beginning of disk
13 number two, Volume Number 1, of the deposition of
14 Margaret Felts on February 5th of the year 2020.

15 We are on the record at 11:13 a.m.

16 MR. STODDARD: Ms. Felts, actually, I'm going to
17 mark Exhibit 1-3.

18 (Deposition Exhibit 1-3 was marked
19 for identification and is attached
20 hereto.)

21 BY MR. STODDARD:

22 Q Ms. Felts, do you recognize this document?

23 A Yes.

24 Q Is this your contract with the California
25 Public Utilities Commission related to your work in

1 this matter?

2 A Yes.

3 Q Do you see where it says "Start Date
4 October 21, 2019 or upon DGS OLS approval, whichever
5 is later"?

6 A Yes.

7 Q Is that the date that this document was
8 mailed to you?

9 A What date?

10 Q Is October 21, 2019 the day that you
11 received the contract?

12 A I don't know.

13 Q I'll direct you to the bottom of the
14 document where it shows your signature with the date
15 signed of November 5, 2019.

16 Do you see that?

17 A Yes.

18 Q And on the next page it shows a signature
19 from the Department of General Services with a stamp
20 of November 7, 2019.

21 Do you see that?

22 A Yes.

23 Q Okay. Do you recall whether you received
24 this document weeks prior to the date that you signed
25 it?

1 A I would have received it --

2 I think I received it a week before this
3 signature date because I signed one and returned it,
4 and then I was notified about five days later that
5 there was an error in the way it was written.
6 Something was omitted so GSA had sent it back and I
7 re-signed it; so this is the second signature of
8 mine.

9 So there was an iteration in there about a
10 week's turn around. I don't remember the exact date
11 when I received the first draft of it.

12 Q Okay. Do you recall how it was transmitted
13 to you?

14 A By email.

15 Q "By email."

16 From --

17 MR. GRUEN: I'm going to note an objection to
18 the extent that calls for attorney-client privilege.

19 Notwithstanding, I think you can answer that
20 question, if you're able to.

21 THE WITNESS: So the process here is that the
22 first draft is provided by email for me to review,
23 and then I would return that, possibly with an
24 electronic -- a scanned version with the signature.

25 When they get the contract ready to be

1 signed officially, they mail it overnight mail to me,
2 and I wet sign it. And I send it back by, you know,
3 overnight mail.

4 BY MR. STODDARD:

5 Q When you say "they," do you mean the
6 California Public Utilities Commission?

7 A Yes. The contracts officer, yes.

8 Q Do you recall who the contracts officer was?

9 A I think her name was Peggy Owens. Peggy
10 Owens.

11 Q Okay. Did you correspond with SED personnel
12 related to this contract?

13 A No.

14 Q Were you contacted by SED personnel prior to
15 executing this contract related to the engagement?

16 A I was only contacted by the legal office.

17 Q Okay. So prior to signing this contract,
18 you had not had any -- strike that.

19 In connection with this engagement, prior to
20 signing this contract you had not had any contact or
21 communications with SED personnel about this matter?

22 A That's correct.

23 MR. GRUEN: Can I just clarify it?

24 By "SED personnel," can you clarify that
25 term?

1 MR. STODDARD: Thank you. Yes.

2 Anyone that Ms. Felts is aware is part of
3 the SED department.

4 Q In other words, staff that would be assigned
5 to SED or counsel working in this matter representing
6 SED, including Darryl Gruen, Amy Yip-Kikugawa or
7 Nicholas Sher.

8 A Okay. I had communications with Karen Shea
9 and later with Darryl Gruen after the contract was
10 signed.

11 Q Okay. So you had communications with
12 Karen Shea prior to the contract execution about your
13 engagement in this matter?

14 A Yes.

15 Q Okay. Do you recall if those were email
16 communications?

17 A They would have been email communications.
18 Maybe a phone call.

19 Q Okay. I don't believe we have those email
20 communications to the degree there are any.

21 Ms. Felts, I'm going to direct you to
22 Exhibit A of the contract. It's on page -- it begins
23 on page 3. It's the "Scope of Work."

24 A Okay.

25 Q Do you see below where it says "Write

1 opening reply and rebuttal testimony as an expert
2 witness on behalf of the PUC's Safety and Enforcement
3 Division, and based on results of this analysis
4 testify in relation to that testimony at hearings if
5 necessary."

6 Is that correct?

7 A Is that at the bottom?

8 Q I'm sorry, paragraph 5a.

9 A Okay. I see it.

10 Q About halfway down that indented
11 paragraph --

12 A Yes.

13 Q -- do you see where it refers to you as an
14 expert witness on behalf of the CPUC Safety and
15 Enforcement Division?

16 A Yes.

17 Q And then the next sentence which says in
18 preparation for testimony you will provide extensive
19 review of Southern California Gas Company records as
20 necessary to assess compliance with safety
21 requirements?

22 A Yes.

23 Q And then turning to the next page of
24 Exhibit A, this is page 4 of the document.

25 Do you see where it says in paragraph h that

1 your scope of work includes discuss, support and
2 review legal briefs, motions and other legal and
3 procedural documents as necessary.

4 A Yes.

5 Q And in paragraph i where it States, "When
6 necessary, provide and manage subcontractors who may
7 provide necessary technical services and support to
8 SED"?

9 A Yes.

10 Q Are you aware of any subcontractors engaged
11 by SED in this matter?

12 A Do you want to restate that again?

13 Q Paragraph i states that "When necessary,
14 provide and manage subcontractors who may provide
15 necessary technical services in support to SED."

16 Do you see that?

17 A Yes.

18 Q Are you aware of any subcontractors in this
19 matter?

20 A Those would be subcontractors to my
21 contract?

22 Q Or to SED.

23 A I would not know what SED is doing, but I
24 believe this has to do with if I hired someone to
25 help me as a subcontractor.

1 Q I'm not asking about your interpretation of
2 the provision so much as asking whether you have been
3 doing work related to providing or managing
4 subcontractors related to technical services in
5 support to SED in this matter.

6 MR. GRUEN: I'm going to object to that as
7 overly broad, just to the extent it calls for
8 subcontractors which are outside the scope of
9 Ms. Felts' contract.

10 So one option is to restate that. Or if you
11 want, you can ask her to answer as you've worded it.

12 MR. STODDARD: I would ask --

13 Okay, I'll restate in a few different
14 questions.

15 Q One is have you engaged any subcontractors
16 pursuant to your contract?

17 A Not yet.

18 Q Okay. Have you worked with any other
19 subcontractors in this matter engaged by SED?

20 A No.

21 Q Do you intend to engage any subcontractors?

22 MR. GRUEN: I'm going to object to the extent
23 that calls for attorney work product privilege.

24 And I'm going to instruct the witness not to
25 answer the question.

1 It also may -- just for the record, that may
2 involve attorney-client privilege as well.

3 BY MR. STODDARD:

4 Q Okay. Ms. Felts, what did you do today to
5 prepare for today's deposition?

6 Did you review any documents?

7 A I read through the opening testimony.

8 Q Did you meet with anyone -- I'm not asking
9 you to divulge attorney-client privilege information.

10 Did you meet with anyone aside from your
11 counsel?

12 A No.

13 Q Did you review the exhibits relied upon in
14 your opening testimony?

15 A I reviewed some of them.

16 Q Did you review any discovery, data requests
17 and data responses?

18 A Yes.

19 Q Do you recall which ones?

20 A I couldn't give you an exact list, but I
21 looked at some well files.

22 Q Do you recall which wells the well files
23 related to?

24 A Well, I assessed 25, 25-A, 25-B, 6, but I'm
25 not sure if it was an SS-6 or another one.

1 Q Okay. Did you prepare any written materials
2 in preparation for this deposition?

3 A No.

4 Q And I apologize for jumping around, but I'm
5 going to refer back to -- it's not exactly necessary,
6 but I'm referring back to your contract which is
7 Exhibit 1-3, and I would just like to confirm do you
8 have any other current contracts with the California
9 Public Utilities Commission?

10 A No.

11 Q Do you have any other current contracts with
12 the State of California or any agency or
13 department --

14 A No.

15 Q -- thereof?

16 A No.

17 Q At the time that you were engaged in your
18 contract, did you understand the scope of your work
19 to be to provide expert testimony in this matter?

20 A Yes.

21 Q What did you understand the scope of issues
22 you were to address to be?

23 A What's described here in this scope of work.
24 That is what I was asked to do.

25 Q Did you believe that it related to records

1 review?

2 A Yes.

3 Q Did you have prior awareness of the
4 Aliso Canyon incident?

5 A Yes.

6 Q Had you reviewed records related to the
7 Aliso Canyon incident prior to your engagement?

8 A I did not have access to anything other than
9 what was publically available.

10 Q Did you review what was publically
11 available?

12 A Yes. I had a file I was collecting stuff
13 in.

14 Q When did you begin collecting stuff?

15 A About the time the incident began.

16 Q Why were you collecting stuff?

17 A Well, historically I usually get called
18 sooner or later on these things; so I had an interest
19 in it.

20 Q So you expected to be appearing as an expert
21 witness in this matter before you were engaged by
22 SED?

23 A Well, it was a possibility. And I'm a
24 consultant.

25 Q Do you recall the sources that you went to

1 for those public records?

2 A Well, I signed up for SoCalGas's regular
3 news, the little news releases that came out, came
4 across, I think on email. I started following a
5 different proceeding having to do with the potential
6 closure of the gas storage unit. And so I --

7 When I went to the PUC and signed -- you
8 know, electronically signed up for -- to be a
9 party -- not a party, but to receive the information
10 on that case -- and I don't remember the case number,
11 I'm sure you know it --

12 So I received regular information about that
13 case and kind of followed it. And may or may not
14 have kept records that came through from that.

15 Q But you -- I mean, you said you "collected"
16 it.

17 Did you save it in a file on your desktop?

18 A I would have -- I don't --

19 I think I probably just saved the emails
20 that came in an email file folder.

21 Q Okay. And did you review these materials
22 when you were preparing your testimony?

23 A No. They're not useful for this.

24 Q Why not?

25 A Well, I have plenty of data that has come

1 through discovery on this case to look at without
2 going to some other source right now.

3 Q Okay. Aside from the scope of work
4 described in your contract, were you engaged in any
5 other capacity by SED to work on this matter?

6 A No.

7 Q Has SED utilized you in any other capacity
8 in your work on this matter?

9 A No.

10 Q Ms. Felts, were you involved in SED's
11 preliminary investigation related to the Aliso
12 Canyon's incident prior to the initiation of the
13 formal OII?

14 A No.

15 MR. STODDARD: I'm going to mark Exhibit 1-4.

16 (Deposition Exhibit 1-4 was marked
17 for identification and is attached
18 hereto.)

19 BY MR. STODDARD:

20 Q Ms. Felts, do you recognize this document?

21 A Yes.

22 Q This is an email from Mr. Gruen to you and
23 Ms. Shea sent on Friday, November 8th at 9:19 a.m.;
24 is that correct?

25 A Yes.

1 MR. GRUEN: If I may, I just noticed, I'm noting
2 that because the document is identified as Public
3 Utilities Code Section 583, that to the extent
4 questions elicit information from Ms. Felts that are
5 protected by PU Code Section 583, we would look to
6 SoCalGas to properly mark that as confidential.

7 MR. STODDARD: Understood.

8 Q And Ms. Felts, it appears that this included
9 attachments which were transcripts of examinations
10 under oath conducted by SED; is that correct?

11 A Yes.

12 Q Is this the first email that you received
13 from SED in connection with this matter?

14 A Well, I'd say November 8th would be -- it
15 would have to be the first, or there may have been
16 others that came on that date. I didn't receive
17 anything before this.

18 Q Earlier you stated you had email
19 communications with Ms. Shea prior to your execution
20 of the contract.

21 A Well, I think I did about the contract, that
22 was -- she was handling that coordination with the
23 contracts office with Peggy.

24 MR. STODDARD: Okay. Darryl, while we're on the
25 record, if you'd like us to submit a written request

1 or follow up with our prior request for all
2 communications, we can do so.

3 But I prefer to just state it on the record
4 that you confirm the date of the first email
5 communications and produce any additional
6 communications between Ms. Felts and SED personnel or
7 SED counsel.

8 MR. GRUEN: Yeah. I mean, I think we would like
9 to have -- it's noted for the record, of course.

10 But we appreciate having something in
11 writing as well if there is an indication that there
12 is something that you have not received.

13 MR. STODDARD: Okay.

14 MR. GRUEN: And perhaps just for our
15 understanding if you think that's the case, if you
16 could clarify the dates, just so we understand what
17 dates you're looking for.

18 MR. STODDARD: We appreciate that. We'll
19 provide that. We don't know the dates of prior
20 emails, which is what we're getting at.

21 MR. GRUEN: Okay.

22 BY MR. STODDARD:

23 Q Since your initial engagement, who have been
24 your primary points of contact for SED?

25 A Darryl and Karen.

1 Q "Darryl and Karen"?
2 Have you also spoken with Mr. Sher,
3 Nicholas Sher, counsel of SED?
4 A No, not yet.
5 Q Have you emailed with him?
6 A No.
7 Q How about Randy Holter?
8 A Don't --
9 I don't know who that is.
10 Q You don't know who that is.
11 Matt Epuna?
12 A No.
13 Q E-P-U-N-A?
14 A No.
15 Q Maria Solas?
16 A Maria Solas.
17 No.
18 Q Lee Palmer?
19 A No.
20 Q Bear with me, I'm going to ask some more
21 names.
22 Amy Yip-Kikugawa?
23 A I know Amy. I have not communicated with
24 her in years.
25 Q You know her from prior matters?

1 A Yes.

2 Q Is that from San Bruno?

3 A I think so, yes.

4 Q How about Ken Bruno?

5 A No.

6 Q Jack Mulligan?

7 A No.

8 Q Mitch Chafsome?

9 A No.

10 Q Have you communicated with anyone from the
11 California Advocates office, the Public Advocates
12 Office, formerly know as the Division of Ratepayer
13 Advocates and several other names?

14 A Yeah, I was going to say --

15 Q Have you communicated with anybody from
16 Cal Advocates relating to this matter since you were
17 engaged?

18 A No.

19 Q Have you communicated with anyone from
20 Cal Advocates about this matter before you were
21 engaged by SED?

22 A Ever?

23 Q Related to the Aliso Canyon incident, to
24 your knowledge.

25 A No.

1 Q And since you were engaged have you spoken
2 with Blade, anyone from Blade Energy Partners?

3 A No.

4 Q Before you were engaged but following the
5 Aliso Canyon incident, did you have any contact or
6 communication, to your knowledge, with anyone from
7 Blade Energy Partners?

8 A No.

9 Q Okay. So based on what you said earlier,
10 and correct me if I'm wrong, it sounds like your only
11 points of communication with SED have been Darryl
12 Gruen and Karen Shea; is that correct?

13 A Yes.

14 Q And you communicate via email?

15 A And phone.

16 Q And phone; do you text, text message?

17 A I sent Darryl a first text message this
18 morning to tell him that I got here.

19 Q Okay. Do you communicate by via mail, hard
20 copy?

21 A No.

22 Q "No."

23 In-person meetings?

24 A No. I live in Colorado. This is the
25 in-person meeting.

1 MR. STODDARD: Okay. I'd like to introduce
2 Exhibit 1-5.

3 (Deposition Exhibit 1-5 was marked
4 for identification and is attached
5 hereto.)

6 BY MR. STODDARD:

7 Q Ms. Felts, do you recognize this document?

8 A Appears to be an email to me.

9 Q That is correct. It's an email from Darryl
10 Gruen to you on November 8th, the same day as your
11 first -- well, the same day as the prior email that
12 we discussed --

13 A Yes.

14 Q -- related to the EUO transcript.

15 And this one, the subject line is "Scoping
16 Memo Recordkeeping Language."

17 At that time was it your understanding that
18 you were being engaged for the purposes of assessing
19 SoCalGas's recordkeeping practices?

20 A I think that was part of the engagement,
21 yes.

22 Q Was it your understanding that that was your
23 primary purpose of your engagement in this matter?

24 MR. GRUEN: Objection. Just use of the word
25 "primary" is vague.

1 Can you clarify?

2 MR. STODDARD: Sure.

3 Q At the time of your initial engagement, and
4 we'll have to be a little bit -- you know, within the
5 first few days of signing the contract, during your
6 initials discussions with SED, was it your
7 understanding that you were being engaged based on
8 your experience with recordkeeping in other utility
9 investigations?

10 A I think my understanding was that my
11 recordkeeping experience was important to them to be
12 able to look at recordkeeping issues, but also to
13 look at other issues that had arisen through the
14 Blade investigation.

15 Q Do you recall asking Darryl to send you the
16 specific scope language related to the recordkeeping
17 issue?

18 A You're asking me if I sent him an --

19 Q It appears --

20 A -- email before I got this?

21 Q Yeah, whether an email or a phone call.

22 It appears that this email was sent -- there
23 is no context for this document.

24 A And I don't remember a context to it. I
25 don't remember why he would send me only the

1 paragraph 4, especially since I think it's in the
2 contract.

3 Q Do you recall having a phone call about it?

4 A It's possible. It's possible because he
5 called me right as soon as the contract was signed,
6 and we both received copies of the contract by email;
7 so it's possible that there was some discussion and
8 he sent this as a result of a request or something or
9 maybe clarification. I'm not sure.

10 Q Okay. Approximately how frequently do you
11 communicate with either Darryl or Karen?

12 MR. GRUEN: I'm going to just object to the
13 extent that that calls for attorney-client and
14 attorney work product following the publication of
15 the opening testimony.

16 But to the extent that we're talking about
17 communications prior to the publication of the
18 opening testimony, she can answer.

19 BY MR. STODDARD:

20 Q Prior to the publication of the testimony,
21 how frequently did you communicate with either Darryl
22 or Karen? I mean approximate.

23 A So after the contract was written -- was
24 signed, I -- my communications with Karen diminished
25 to only being able to get access to databases at the

1 PUC. There was some logistics that was involved in
2 doing that, and I was having difficulty remotely; so
3 that's what was happening there.

4 And then -- and when the contract was
5 signed, then I heard from Darryl. And I would say we
6 probably communicated daily between then and when the
7 opening testimony was sent. But I don't know
8 exactly. I looked at all of the emails that Darryl
9 copied to you, and as far as I know, that was
10 complete -- a complete set.

11 Q So daily communications could have been
12 phone and email?

13 A Possibly, yes.

14 Q Do you recall multiple times a day?

15 A Possibly during that period of time because
16 it was a very short lead time. I was trying to look
17 at as much stuff as I could before the testimony was
18 due to be filed.

19 Q You mentioned having trouble accessing
20 databases at the PUC.

21 A Yes.

22 Q Do you recall the specific databases?

23 A There is a database called Diamond buried
24 somewhere in their system.

25 Q What kind of database is that?

1 A It's the one where all of your responses
2 were supposed to be housed.

3 Q That's a file management system?

4 A Yes.

5 Q And you had to be granted access to it
6 because you were remote?

7 A Well, all of the data in response to data
8 requests was provided to the PUC, I guess, either by
9 email or -- and/or thumb drives. That information
10 was all uploaded to this database at the PUC on their
11 mainframe. And the idea was for me to be able to
12 call in and review records there remotely.

13 It was obviously too voluminous to print out
14 and send me boxes of paper; So I did receive the
15 responses to DR 16 in paper. I believe Karen sent
16 that to me.

17 Q Do you recall about when you successfully
18 gained access to the PUC's database?

19 And, again, I'm not asking for a specific
20 date here; it's more relative to your engagement or
21 your opening testimony.

22 A I would say sometime right around the time
23 the testimony was filed.

24 Q Before? After?

25 A I don't know without looking back at the

1 dates on the -- on the emails, but I would say maybe
2 a couple of days before.

3 Q Okay. And before you gained access to the
4 Diamond database, any documents that you would have
5 been -- that SED would have transmitted to you would
6 have been via email?

7 A No. I don't think I got any data responses
8 by email before then.

9 I had the Blade reports, which was a lot of
10 reading and review. And so I had -- I had the
11 transcripts that were emailed to me that you just saw
12 in this last email.

13 And then I had the paper copies of DR 16 to
14 look at, which included a set of the daily reports
15 for Boots & Coots drilling. And I think that's
16 primarily what I had to look at initially, which --

17 And so a full set of the Blade reports
18 included all of the supplemental reports; so it was a
19 complete set of the volumes of that.

20 Q And did the PUC -- or SED, I'm sorry.

21 Did SED share anything with you via FTP?

22 A Not at that time. I didn't have an FTP
23 access until probably at least three weeks after my
24 contract started, and then I was able to FTP large
25 files.

1 Q The Blade report, where did you obtain that
2 on the Aliso Canyon's web page?

3 A No, I couldn't download it, but I had tried
4 actually when they started to talk about the
5 contract, and the only thing I could get was the main
6 report; so the rest of it was mailed to me in hard
7 copy. Karen sent it to me.

8 Q Okay. Was anything else mailed to you in
9 hard copy?

10 A The responses to DR 16.

11 Q Okay. Do you recall the approximate date
12 that you received the Blade report in the mail?

13 A I think it was mailed overnight mail right
14 after the contract was signed.

15 Q And you reviewed it after you received it?

16 A Yes.

17 Q Do you recall how long it took you?

18 A There are days when I'm still reading on it.

19 Q Did you review other preliminary
20 investigation -- preliminary SED investigation
21 records aside from the documents that we've just
22 discussed --

23 A No.

24 Q -- prior to preparation of your opening
25 testimony?

1 "No"?

2 So the records produced by SoCalGas would
3 have been limited to those that were shared with you
4 by SED between the contract date and the date of your
5 opening testimony?

6 A I -- I had to have had access to the Diamond
7 database at least a couple of days before because I
8 spent at least a day looking through the SS-25 well
9 file. And it was the first file that was provided
10 to -- in response to a data request. I think it must
11 have been in response to the Data Request 1.

12 It was a file of individual -- each page was
13 an individual PDF. That is the well file that I
14 reviewed before the opening testimony was filed.

15 Q Do you recall reviewing any other records in
16 the Diamond database aside from the well file prior
17 to your -- to service of your opening testimony?

18 A I believe I read there was -- there were
19 copies of the Data Request 1 and a Data Request 1
20 that was SED and D-O-G -- DOGGR, and Data Request 2;
21 so I think I only reviewed the response attachments,
22 the data, for DR-1.

23 Q Thank you.

24 Did you review the Public Utilities Code
25 prior to preparing your opening testimony or prior to

1 serving your opening testimony?

2 A I reviewed Section -- is it 451? The safety
3 section, whichever that one is.

4 Q That's it?

5 A That's it.

6 Q Did you review the Commission's Rules of
7 Practice and Procedure?

8 A No.

9 Q Did you review any internal SED legal
10 research or analysis?

11 A No.

12 Q Since you've been engaged by SED, we talked
13 about the scope of work a little bit earlier in your
14 contract.

15 Since you've been engaged by SED, have you
16 assisted with preparation of any pleadings?

17 A No.

18 Q Data requests?

19 A Yes.

20 Q Data responses?

21 A Yes.

22 Q Did you review any draft SED reports related
23 to findings of their preliminary investigation?

24 A What would that be?

25 Q Any documents that include findings,

1 summaries of evidence, alleged violations.

2 A Other than the draft filing, the draft
3 opening testimony?

4 Q Other than the draft opening testimony.

5 A No.

6 Q Earlier we were talking about the Blade
7 report. I'm going to briefly check to just see if
8 you've had any contact with any of the individuals.

9 Will you allow me to just name the names?

10 If she doesn't know them, she doesn't know
11 them. If she does, she does. I'm not going to enter
12 this as an exhibit right now.

13 MR. GRUEN: No objection.

14 BY MR. STODDARD:

15 Q Ms. Felts, do you know Ravi Krishnamurthy?

16 A No.

17 Q Have you ever spoken to Mr. Krishnamurthy?

18 A No.

19 Q Have you ever had email contact with
20 Mr. Krishnamurthy?

21 A No.

22 Q How about Nigel Alvares?

23 A No.

24 Q Greg Asher?

25 A No.

1 Q William Bacon?
2 A No.
3 Q Miodrag Bogdanovic?
4 A No.
5 Q Ismail Ceyhan?
6 A No.
7 Q Ming Gao?
8 A No.
9 Q Bill Whitney?
10 A No.
11 Q Shree Krishna?
12 A No.
13 Q Are you familiar with Ecolise, an entity
14 named Ecolise?
15 A No.
16 MR. GRUEN: I'm sorry, can you clarify, is that
17 a person?
18 MR. STODDARD: No, that's a company. Ecolise.
19 MR. GRUEN: Okay.
20 BY MR. STODDARD:
21 Q Liz Summer, do you know her?
22 A No.
23 Q How about Jerry Shursen?
24 A No.
25 Q Or GSM Oil Field Services?

1 A No.

2 MR. STODDARD: We're going to introduce
3 Exhibit 1-6.

4 (Deposition Exhibit 1-6 was marked
5 for identification and is attached
6 hereto.)

7 BY MR. STODDARD:

8 Q Ms. Felts, have you seen this document
9 before?

10 MR. GRUEN: I'm sorry, can we just give the
11 witness an opportunity to review this?

12 MR. STODDARD: Yes.

13 THE WITNESS: I don't think I've ever seen this.

14 BY MR. STODDARD:

15 Q Okay. It's an email from Bob Pilko to Randy
16 Holter and Bill Whitney with Ravi Krishnamurthy,
17 Cyndy Reed and PV Suryanarayana copied, and it's from
18 January 28, 2016.

19 Do you know, have you --

20 Do you know Bob Pilko?

21 A No.

22 Q Have you ever had contact with Bob Pilko?

23 A No.

24 Q Do you see below where it states --

25 It's an email from Randy Holter and says

1 "Hello Bob, I want to introduce myself for as the
2 Lead Investigation for the CPUC on the Aliso Canyon
3 Storage Facility SS-25 Well Leak."

4 A Yes.

5 Q Were you aware that Randy Holter was the
6 lead investigator for SED on the matter?

7 A No.

8 MR. GRUEN: I'm going to just object to that as
9 the characterization is vague as to time; so just the
10 question was asked in the present tense.

11 BY MR. STODDARD:

12 Q Are you aware that Mr. Randy Holter at any
13 period of time is or was the lead investigator in the
14 Aliso Canyon matter?

15 A I don't really know anything about the case
16 prior to me coming on it.

17 Q And you earlier said you haven't had any
18 contact with Mr. Holter, correct?

19 A I don't know who that is. No.

20 Q Okay. Are you aware of any other individual
21 for SED being identified as the lead investigator or
22 having the role of lead investigator at this time?

23 A Right now?

24 Q Yeah.

25 A I don't know who might have that

1 designation.

2 MR. STODDARD: Okay. I'm going to introduce
3 Exhibit 1-7.

4 (Deposition Exhibit 1-7 was marked
5 for identification and is attached
6 hereto.)

7 BY MR. STODDARD:

8 Q Ms. Felts, do you recognize this document?

9 A Yes.

10 Q This is your --

11 This is the opening testimony of SED in the
12 Aliso Canyon investigation proceeding, correct?

13 A Yes.

14 Q And if you look at the top left corner it
15 identifies the docket number, the commissioner, the
16 administrative law judge.

17 It does not identify you as the witness; is
18 that correct?

19 A Right.

20 Q And there is no witness identified; is that
21 correct?

22 A Looks like that's correct.

23 Q Do you have any changes to your testimony at
24 this time?

25 A No.

1 Q You said you reviewed this in preparation
2 for today's deposition, correct?

3 A I reviewed part of it.

4 Q Which part?

5 A Let's see if I can find it.

6 Starting at page 51 I read that last night.

7 Q Okay. So you started reviewing the
8 testimony immediately after the sections that deal
9 with the Blade report; is that correct?

10 A Yes.

11 Q Why didn't you review the sections that deal
12 with the Blade report?

13 A I felt like I could answer questions about
14 that so I didn't need to refresh my memory.

15 Q Okay. Did you write this?

16 A No.

17 Q Who did?

18 A Well, let me take that back.

19 I wrote part of it. I wrote the
20 recordkeeping section. And the rest of it was
21 already drafted when I arrived on the scene.

22 Q Do you know who wrote it?

23 A No.

24 Q Who did you receive it from?

25 A Darryl.

1 Q Did you ask who wrote it?

2 A No.

3 Q So you didn't want to speak with the person
4 who prepared the testimony to ask them questions
5 about why they included certain information?

6 A I just read it and felt like I understood
7 what they were writing about. I didn't feel it was
8 necessary to track down authors.

9 Q But you are sponsoring it as your own
10 testimony, correct?

11 A I was asked to sponsor it. I read it and I
12 said that I could sponsor it, and so I am.

13 Q The entirety of the testimony?

14 A Yes.

15 Q Okay. It includes --

16 I mean, it's approximately 80 pages, is that
17 correct, 82 pages?

18 A Yes.

19 Q And it includes close to 500 footnotes?

20 A Yes.

21 Q Did you review and confirm each of the
22 footnotes?

23 A I read the footnotes. I did not verify them
24 all. Some of them I went to the source, others I did
25 not.

1 Q So for everything that is cited in here, you
2 reviewed the document that it was cited to?

3 A I'd have to look at every footnote to answer
4 that question. Is that what you're asking me?

5 Q Well, I'm asking whether you were approached
6 to getting yourself comfortable in sponsoring this
7 report included reviewing all of the evidence --
8 alleged evidence that is relied upon in the document.

9 A There may be a couple of footnotes that I
10 didn't verify, but generally everything that is tied
11 to the Blade report I verified. If there is
12 something else in here that didn't look like it was
13 necessary for me to verify it, I didn't. There
14 may --

15 I think there are supporting documents
16 that --

17 Q The exhibits?

18 A -- that I reviewed.

19 Yes, the exhibits that went along with it,
20 which would be, say, in the section that I was
21 reviewing last night, there were some letters and
22 exhibits that were provided, and I did read those.

23 Q Did you review all of the exhibits?

24 A Yes.

25 Q Last night or prior to --

1 A No, prior to the testimony right now.

2 Q Prior to the service of testimony?

3 A Yes.

4 Q Did you review those exhibits -- strike
5 that.

6 Did you --

7 You didn't speak to Mr. Mansdorfer, correct?

8 A No, but there is an EUO of Mansdorfer that I
9 read.

10 Q So you reviewed all of the EUOs?

11 A I didn't review them all. I think there are
12 still two or three that I have not read completely,
13 and one of those is Brett Lane, and I don't know,
14 maybe Volume 2 of Brett Lane, and I'm not sure
15 about -- but I'm pretty sure there is at least two
16 others that I haven't read.

17 Q Do you recall if you've reviewed the Boots &
18 Coots witness EUOs?

19 A Yes, I did.

20 Q In the process of preparing or getting
21 yourself comfortable with sponsoring the testimony
22 prepared by others, did you keep any handwritten
23 notes?

24 A No. I just read -- it was very fast paced
25 review because I didn't have much time.

1 So I was working primarily with the Blade
2 report and with this document to make sure that they
3 were properly drawing -- drawing conclusions out of
4 the Blade report to this report and that things
5 weren't being misstated.

6 Q So you worked to confirm that things weren't
7 being misstated relative to the Blade report?

8 A Right, yes.

9 Q You weren't concerned with whether or not
10 the Blade report itself was consistent with the
11 evidence or the facts that have been presented in
12 other records in the proceeding?

13 A So I had very little time and very
14 difficult -- and a lot of difficulty getting access
15 to data that had been provided by SoCalGas. In fact,
16 a lot of the files that I was trying to open, and to
17 this day I can't open, they say that the files were
18 corrupted; so I didn't have access to all of the
19 response data that SoCalGas said they provided.

20 And the best I can do is with my technical
21 knowledge in reviewing the Blade report and just
22 validating in my own mind that what they were doing
23 made sense, and I did review the daily reports with
24 Boots & Coots and compared that to what Blade said
25 had happened. And I just checked to make sure that

1 what was drafted in the opening testimony relative to
2 the Blade report accurately reflected what Blade
3 said.

4 Q And you were comfortable with that process?

5 A Well, it was the best I could do in the
6 amount of time I had available. If I had had more
7 time, I would have looked at all of the data and
8 written my own report. But I didn't have that
9 luxury.

10 Q When you were initially engaged, did you
11 have an understanding of the timeline?

12 A I knew when the opening testimony was due.
13 I knew they were hoping to get some testimony from
14 me, but as the date drew closer, it was -- it was at
15 least possible in my mind that I wouldn't be able to
16 produce testimony in that period of time.

17 Q In part because of the technical
18 difficulties with accessing records?

19 A And the fact that the contract wasn't
20 signed; so, you know, the date when it was due wasn't
21 changing, and I wasn't engaged yet. So there is only
22 so much you can do in a couple of weeks' time.

23 Q So did you begin work prior to --

24 Did you begin substantive work in this case
25 prior to execution of the contract?

1 A No.

2 Q So your concern with the delay in the
3 execution of the contract was you understood that you
4 had testimony due on a date certain --

5 A Right.

6 Q -- but that you weren't going to start
7 looking at records until after the contract was done?

8 A Right.

9 Q So you wouldn't start substantive work or
10 communicate with SED until after the contract was
11 done?

12 A Exactly.

13 Q And did you understand at the time that you
14 were engaged that there was already draft testimony
15 that had been prepared?

16 A I think Darryl told me that they were
17 working on a draft when he called me and the contract
18 was signed; so before that, I didn't know that they
19 were drafting anything.

20 Q And did he tell you or describe the scope of
21 violations or issues that your testimony would be
22 addressing?

23 And I don't mean the scope of work
24 contractually. I mean the scope of issues that is in
25 your testimony substantively.

1 A I'm sure we talked about that.

2 Q Okay. You indicated you didn't keep any
3 notes, but in reviewing documents, you said mostly
4 you read.

5 Did you mark up documents, underline, keep
6 margin notes?

7 A Excuse me. Just a second.

8 I typically don't mark documents. I rarely
9 highlight anymore. And sometimes I use sticky notes.

10 THE VIDEOGRAPHER: You've lost your microphone.

11 THE WITNESS: I'm sorry.

12 THE VIDEOGRAPHER: It's just off the clip there.

13 THE WITNESS: Sometimes I use sticky notes to
14 mark pages.

15 BY MR. STODDARD:

16 Q In this case you used sticky notes to mark
17 pages?

18 A Like a tab, you know?

19 Q Right.

20 A Yes.

21 Q And do you recall highlighting any documents
22 in this?

23 A I don't believe there is any highlights in
24 any documents.

25 Q Okay. And did you collect records that you

1 had marked with highlights or sticky notes and
2 provide them to SED in connection with a request for
3 work papers?

4 A Well, there weren't any highlights, and so a
5 sticky note thing, I would just tab a page so I would
6 go back to it, and I typically reuse those tabs so
7 there wouldn't be any way to recover that as
8 something to send to you.

9 Q What do you mean "reuse"?

10 You put them on the document and then you
11 take them off the document?

12 A Yeah, I reuse them.

13 So I mark documents -- I mark pages that I
14 want to go back and look at. Once I go back and look
15 at it, I pull it off, put it in my sticky note pad
16 and reuse it somewhere else.

17 Q So does your copy of the Blade report that
18 is sitting at your home today have sticky notes on
19 it?

20 A No. There is no sticky notes in my Blade
21 report right now.

22 Q Do you think any of the documents that you
23 have at your home in hard copy related to this
24 investigation presently have sticky notes on them?

25 A They might presently, but they would be

1 documents that I didn't have prior to the filing of
2 the initial testimony.

3 Q Okay. We can take a break after -- just one
4 more question and then we can break for lunch.

5 The sticky notes that you use, are they like
6 this kind, Post-it notes?

7 A Yes.

8 Q Well, I wasn't sure if it was like that or a
9 blue kind, like a flag.

10 A No, I don't have the little blue kinds. I
11 only have yellow ones.

12 Q For the record, Ms. Felts indicated that she
13 uses the little Post-it notes.

14 Do you write on them?

15 A No, not often. I mean, if I wrote something
16 on it, it would be like a -- something that says
17 "Read this again."

18 Q Do you recall writing anything on any sticky
19 notes in this case prior to the service of your
20 opening testimony?

21 A No, I don't even think I used sticky notes
22 prior to the opening testimony.

23 Q Since service of the opening testimony?

24 A It's possible there is something written on
25 some note somewhere.

1 Q Okay. And aside from that, you haven't kept
2 any other notes, handwritten, electronic --

3 A You're asking me --

4 Q -- or otherwise?

5 A -- prior to the opening testimony being
6 filed?

7 Q Yes.

8 A You have everything I had, which is whatever
9 Darryl sent you.

10 MR. STODDARD: Okay. Let's take a break for
11 lunch. Come back at, let's say, 1:15. Let's make it
12 1:10 and we'll get started at 1:15.

13 MR. GRUEN: That sounds reasonable.

14 THE VIDEOGRAPHER: This is the end of disk
15 number two, Volume Number 1, of the deposition of
16 Margaret Felts on February 5th of the year 2020.

17 We are off the record at 12:15 p.m.

18 (Lunch recess.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Investigation) I.19-06-016
on the Commission's Own Motion) (Filed 6-27-19)
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) .)
_____)

DEPOSITION OF MARGARET C. FELTS
Los Angeles, California
Wednesday, February 5, 2020
AFTERNOON SESSION

Reported by:
LINDA RYAN
CSR No. 9915
JOB No. 311652

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Los Angeles, California
Wednesday, February 5, 2020
1:24 p.m. - 8:39 p.m.

THE VIDEOGRAPHER: Here begins disk number three, Volume Number 1, of the deposition of Margaret Felts on February the 5th of the year 2020.

We are on the record at 1:24 p.m.

MR. GRUEN: I'm terribly sorry. Could we go off the record for just a moment, would that be okay?

MR. STODDARD: Yes.

THE VIDEOGRAPHER: Just a moment, please.

We are off the record at 1:24 p.m.

(Off the record.)

THE VIDEOGRAPHER: We are back on the record at 1:24 p.m.

MR. GRUEN: While we were off the record we just had clarified that during the lunch break, Ms. Felts had refreshed her recollection as to her role regarding the item on her resume, entitled the "PG&E General Rate Case FERC Docket No. ER 16-2320-000," and she is prepared to make a statement for the record as to her role updating the information she provided this morning.

BY MR. STODDARD:

1 Q Okay. And for the sake of clarity, this
2 relates to Exhibit 1-2; is that correct?

3 A Yes.

4 Q Go ahead.

5 A Okay. So on that case the only thing I did
6 was help with some discovery and reviewed the
7 responses to that discovery, and I believe I sat in
8 on one interview.

9 Q And by "interview," do you mean deposition?

10 A It was actually something informal. It was
11 not a deposition.

12 Q And you were retained as an consulting
13 expert?

14 A Yes.

15 Q In what capacity? What was the scope of
16 your work?

17 A It had to do with electric utility issues.
18 And, honestly, without looking back at the file, I
19 couldn't tell you exactly what it was that we were
20 looking at.

21 I remember that I was doing discovery.
22 I did not file testimony, did not write anything.

23 Q And your client was the California Public
24 Utilities Commission?

25 A Yes.

1 Q And do you recall what the case concerned?

2 A So it was a rate case, so there must have
3 been some subset of the rate case that they needed
4 expertise on that I could provide; so I didn't -- I
5 don't think I billed very much on that case.

6 Q What discovery questions do you recall
7 preparing?

8 A None. I would have to look at a file to
9 see.

10 Q Do you remember the general subject matter?

11 A No. I don't really remember too much about
12 it.

13 Q Okay. But it didn't relate to natural gas
14 storage facilities?

15 A It had nothing to do with natural gas.

16 Q Okay. And otherwise that entry is accurate
17 on your resume?

18 A Yes.

19 Q Except for the spelling of legal office.

20 A Okay, I'll correct that.

21 Q All right. Thank you for that.

22 So I have another couple of questions I'd
23 like to circle back on that relate to a few other
24 topics that we covered prior to lunch.

25 And the first is we talked a little bit

1 about your work since you were engaged by SED prior
2 to service of your opening testimony and who you
3 spoke with or have spoken with related to your work
4 preparing testimony for the Aliso Canyon matter.

5 You indicated you hadn't spoken with anybody
6 at Blade, correct?

7 A That's correct.

8 Q And you indicated that you hadn't spoken
9 with any other subcontractors, you know, working for
10 SED or for you prior to service of your opening
11 testimony, correct?

12 A That's correct.

13 Q Okay. Have you spoken with any other
14 technical experts related to your work on this
15 matter --

16 A No.

17 Q -- whether engaged by the Commission or not?

18 A No.

19 Q Have you spoken with anybody at SoCalGas
20 about your work on this matter?

21 A No.

22 Q Have you spoken with anybody at SoCalGas
23 about the Aliso Canyon incident generally?

24 A No.

25 Q Have you spoken with anybody at DOGGR about

1 the Aliso Canyon incident?

2 A No.

3 Q Have you spoken with anybody at the
4 California Energy Commission about this incident?

5 A No.

6 Q The Governor's office?

7 A No.

8 Q State Legislature?

9 A No.

10 Q Okay. Thank you.

11 And to clarify, that was the California
12 State Legislature. I know you're a resident of
13 Colorado.

14 A I haven't spoken with anybody in either
15 state.

16 Q Is your answer the same?

17 A Yes.

18 Q Have you spoken with anybody who is employed
19 by the County of Los Angeles?

20 A No.

21 Q The Department of Public Health in
22 Los Angeles?

23 A No.

24 Q Any federal authorities or public officials?

25 A No.

1 Q Okay. Any other government officials in any
2 jurisdiction or any agency about the Aliso Canyon
3 matter that you're aware of?

4 A No. I haven't actually talked to anyone
5 about this case.

6 Q But --

7 What about prior to your engagement in this
8 matter by SED, you know, understanding that it goes
9 back a little ways, do you recall any significant
10 discussions that may be relevant to your testimony?

11 A Nothing relevant to my testimony. At some
12 point maybe a year ago I might have spoken with
13 Darryl Gruen about the case coming up or that it may
14 be it was already in the works. I'm not sure. But
15 we were working on San Bruno; so I probably mentioned
16 the case to him at some point in time that I would be
17 interested in working on it.

18 Q Okay. So you reached out to Darryl to
19 indicate an interest in helping out on the case?

20 A Yes. It was a long time before they
21 actually called me and asked if I would do it, work
22 on it.

23 Q Do you recall the contents of that
24 communication --

25 A No.

1 Q -- what you said?

2 A I probably just said "Gee, Darryl, I'm a
3 petroleum engineer in a former life, and I would be
4 really interested in working on this Aliso case."

5 Q And how did Darryl respond?

6 A He probably told me they were handling it
7 internally because I didn't hear back about it; so
8 just, you know, a consultant reach out.

9 MR. STODDARD: Thank you.

10 I'd like to introduce Exhibit 1-8.

11 (Deposition Exhibit 1-8 was marked
12 for identification and is attached
13 hereto.)

14 BY MR. STODDARD:

15 Q Ms. Felts, do you recognize this document?

16 A Yes.

17 Q This is a data request from Southern
18 California Gas company to SED. And if you can refer
19 to page 3, please, there is a single request.

20 Do you see that?

21 A Oh, right, yes.

22 Q It says "Identify the sponsoring witness(es)
23 for SED's Opening Testimony."

24 A Yes.

25 Q Did you help prepare the response to this

1 question?

2 A No.

3 Q Did you review the response to this
4 question?

5 A Not until after it was filed.

6 MR. MOSHFEGH: That's a different one.

7 MR. STODDARD: I'd like to introduce
8 Exhibit 1-9.

9 (Deposition Exhibit 1-9 was marked
10 for identification and is attached
11 hereto.)

12 MR. STODDARD: I apologize, Ms. Felts. I'm
13 going to restate one of my last questions because I
14 realized you didn't have this document in front of
15 you.

16 Q Just to confirm, my prior question is
17 related to the data request from SoCalGas, which
18 identified the question on page 3.

19 And also if you can please reference on
20 page 2 of the SoCalGas data request paragraph 3
21 identifies a response deadline by close of business
22 on December 6, 2019.

23 Do you see that? Paragraph 3 on page 2.
24 It's the first at the top of the page.

25 A Okay, yes.

1 Q It has the deadline.

2 A I see that.

3 Q And it states the deadline is December 6,
4 2019, which was a few weeks after your testimony was
5 served, correct?

6 A Yes.

7 Q Now, please refer to what we've marked
8 Exhibit 1-9.

9 Do you recognize this document?

10 A Yes.

11 Q Did you help prepare this response?

12 A No.

13 Q Did you review this response?

14 A Not until after it was filed.

15 Q And this states that the sponsoring witness
16 for SED's opening testimony is Ms. Margaret Felts; is
17 that correct?

18 A Yes.

19 Q Did SED consult you about this before they
20 served it?

21 A Well, they --

22 Q They filed it?

23 A They asked me to sponsor the testimony
24 before it was filed, if that's what you're asking.
25 The data response itself was handled, I assume, by

1 Darryl Gruen.

2 Q So why wasn't your name on the opening
3 testimony that was served by SED?

4 A Well, since I didn't prepare the cover page,
5 I can't answer that. It was filed by the PUC. I
6 assume that might have been an oversight because I
7 had agreed to sponsor it before it was filed.

8 Q Did you discuss the fact that your name
9 wasn't on it?

10 A I didn't know until --

11 Q After the fact.

12 A I actually didn't know -- notice it until
13 you just put it in front of me and said that it was
14 empty, that it was blank. I don't even know if I
15 ever had a printed copy of the cover. I might only
16 have an email copy of the document.

17 Q So there was no discussion about whether
18 they could identify you as their witness on the
19 document prior to service?

20 A Well, there was discussion prior to service,
21 and I agreed that I would sponsor it.

22 MR. STODDARD: Okay. I'm going to introduce
23 Exhibit 1-9.

24 THE WITNESS: That's what I have in front of me.

25 MR. STODDARD: I apologize, I have to get these

1 Post-its off.

2 Exhibit 1-10.

3 (Deposition Exhibit 1-10 was
4 marked for identification and is
5 attached hereto.)

6 BY MR. STODDARD:

7 Q Do you recognize this document?

8 A Yes, I've seen it before.

9 Q If you'll turn to page 3.

10 A Okay.

11 Q You'll see the first data request at the
12 bottom is "Identify the date on which SED retained
13 Margaret Felts in connection with the Proceeding."

14 Do you see that?

15 A Yes.

16 Q If you'll turn to page 4 on the back,
17 question 2 is "Identify the date on which Margaret
18 Felts agreed to adopt the entirety of SED's Opening
19 Testimony."

20 Do you see that?

21 A Yes.

22 Q And Commission 3 requests your statement of
23 qualifications.

24 Do you see that?

25 A Yes.

1 MR. STODDARD: I'm going to mark and introduce
2 Exhibit 1-11.

3 (Deposition Exhibit 1-11 was
4 marked for identification and is
5 attached hereto.)

6 BY MR. STODDARD:

7 Q Do you recognize this document?

8 A Yes.

9 Q Did you prepare this data response?

10 A No.

11 Q For purposes of the record, this is SED's
12 data response to SoCalGas's data request for
13 Exhibit 1-10.

14 And you see question 1, 2 and 3 from the
15 prior data request restated there?

16 A Yes.

17 Q And SED's response was that SED contracted
18 with Ms. Felts in connection with this proceeding on
19 November 7, 2019, correct?

20 A That's correct.

21 Q And it states in response to question 2 that
22 you agreed to adopt the entirety of SED's opening
23 testimony on approximately November 17, 2019; is that
24 correct?

25 A I think that's correct.

1 Q Which was approximately five days prior to
2 service of your testimony, correct?

3 A Yes.

4 MR. STODDARD: I'd like to introduce
5 Exhibit 1-12.

6 (Deposition Exhibit 1-12 was
7 marked for identification and is
8 attached hereto.)

9 BY MR. STODDARD:

10 Q Do you recognize this document, Ms. Felts?

11 A Yes.

12 Q What is it?

13 A A report from the San Bruno case. It was
14 the first one that was filed in March 12, 2012.

15 Q So this was your opening testimony in the
16 San Bruno case?

17 A Yes.

18 Q In which PG&E was a defendant?

19 A Yes.

20 Q And it states on the cover document clearly
21 that it is the report and testimony of Margaret
22 Felts, correct?

23 A Yes.

24 Q Did you write this testimony?

25 A Yes.

1 Q Do you recall approximately when you were
2 engaged by CPSD for purposes of preparing this
3 testimony?

4 A Let me look at my resume. It's probably on
5 there.

6 2011. I don't have the day, the day and
7 month.

8 Looks like February 2011. It would have
9 been sometime shortly after that.

10 Q February 2011?

11 A Sometime shortly after that because that's
12 the date of the OII.

13 Q Okay. So approximately a year before your
14 testimony was served?

15 A Yes.

16 Q And do you recall who your point of contact
17 was at SED, then I think CPSD?

18 A Initially it was Bob Cagen.

19 Q "Bob Cagen."

20 And do you recall reviewing SED's
21 investigation records for the purposes of preparing
22 your testimony?

23 A In this case?

24 Q Uh-huh.

25 A No.

1 Q "No."

2 What generally do you recall in terms of
3 your process related to preparing this testimony in
4 this case? What did you review generally?

5 A Well, PG&E data that was submitted to the
6 Commission.

7 Q So by "data" you mean records and documents?

8 A Yes.

9 Q Did you also review the NTSB report?

10 A Yes, I did.

11 Q Did you review an SED report?

12 A An SED report?

13 Q A report or document from SED related to
14 their findings in this matter.

15 A I don't remember an SED report. There could
16 have been one. There was a lot of -- a lot of
17 records that I looked at.

18 Q And do you recall who your point of contact
19 was at SED after Bob Cagen?

20 A Darryl Gruen.

21 Q And in this case did either Bob or Darryl
22 hand you a prepared draft of this testimony when
23 you --

24 A Of this testimony?

25 Q Yes.

1 A No. I actually prepared the entire thing.

2 Q So you prepared the entirety of this?

3 A Yes.

4 Q Based on your review of PG&E's records and
5 data?

6 A Yes.

7 Q And based on the NTSB report?

8 A I probably referred to the NTSB report
9 somewhere.

10 MR. STODDARD: Okay. Thank you.

11 1-13.

12 MR. MOSHFEGH: Yes, 13.

13 MR. STODDARD: I'm going to introduce and mark
14 Exhibit 1-13.

15 (Deposition Exhibit 1-13 was
16 marked for identification and is
17 attached hereto.)

18 BY MR. STODDARD:

19 Q Do you recognize this document, Ms. Felts?

20 A Yes.

21 Q What is it?

22 A This is the testimony I filed on behalf of
23 UCAN in the SCG and SDG&E's Line 1600 Replacement
24 case.

25 Q And if you'll turn to the Table of Contents,

1 which is on page 2, this provides kind of -- the
2 Table of Contents for your testimony which includes
3 prudent management of gas applied for safe operations
4 demands, prudent engineering and various other
5 subject matter areas that you cover in your
6 subsequent testimony, correct?

7 MR. GRUEN: I'm just going to note an objection
8 for the record.

9 To the extent this goes to the substance of
10 the testimony, and it sounds like these questions are
11 beginning to touch on substance, noting the objection
12 at the outset that these are questions regarding a
13 currently open proceeding to which SoCalGas and SDG&E
14 are a party before the Commission.

15 And so the objection is that the -- any
16 information that is elicited from Ms. Felts on this
17 point, that it would be inappropriate to include that
18 information in the record of that proceeding. And
19 our understanding is that the information elicited is
20 only for purposes for the notice of deposition in the
21 Aliso Canyon proceeding.

22 And I would further notice that Ms. Felts --
23 that the attorney who is responsible representing
24 UCAN, which -- and this testimony was prepared for
25 UCAN -- UCAN's attorney is not present at the

1 deposition today.

2 MR. STODDARD: Your objection is noted again.

3 Q Ms. Felts, did you prepare this testimony?

4 A Yes.

5 Q Who was your point of contact at UCAN?

6 A Don --

7 I forget his last name.

8 Q Did anybody at UCAN hand you a draft of this
9 testimony when you agreed to be their consultant and
10 ask you to sponsor this?

11 A No.

12 MR. STODDARD: Thank you.

13 I'm going to introduce Exhibit 1-14.

14 (Deposition Exhibit 1-14 was
15 marked for identification and is
16 attached hereto.)

17 BY MR. STODDARD:

18 Q Ms. Felts, do you recognize this document?

19 A Yes.

20 Q It's an email from Darryl Gruen to Margaret
21 Felts sent on Sunday, November 17, 2019, copied on
22 Karen Shea with the subject line "Re: Status of
23 testimony Attorney Work Product - Confidential."

24 Was it your understanding that your work was
25 protected by attorney-client privilege or attorney

1 work product privilege?

2 MR. GRUEN: I'm going to just note an objection
3 that that doesn't characterize the complete document
4 in that there is indeed a response from Darryl Gruen
5 to Margaret Felts, but that the remainder of that
6 email is, in fact, an email from Margaret Felts dated
7 November 17, 2019 at 9:25 p.m.

8 MR. STODDARD: Okay.

9 Q Again, just to confirm, however, it's two
10 emails; the top email is from Darryl Gruen sent on
11 November 17th to you with a cc on Karen Shea. And
12 the subject line is "Re: Status of Testimony
13 Attorney Work Product - Confidential."

14 A Yes.

15 Q "Yes."

16 Was it your understanding that your work was
17 protected by privilege during this period?

18 A No. I was advised early on when I -- when I
19 received the contract that my communications would
20 probably not be confidential and could be disclosed.

21 Q Did you put that subject line in there?

22 A I don't know if I put it on there or if
23 Darryl put it on there.

24 Q Okay. Who advised you regarding your
25 statement a moment ago that whatever you did in this

1 proceeding was likely not privileged and therefore
2 could be disclosed?

3 A Darryl Gruen.

4 Q In your email below which was sent on
5 November 17, 2019 at 9:25, you wrote "Over the
6 weekend, I read all 1597 pages of the Well File
7 provided by PG&E to SED."

8 I assume in that instance you meant
9 SoCalGas?

10 A Right. On the brain.

11 Q "I did this because I figured it would be
12 the best representation of the condition of
13 SoCalGas's files," correct?

14 A Yes.

15 Q And then you state "The file actually
16 included records for Wells SS-25, SS-25A and SS-25B,"
17 correct?

18 A Yes.

19 Q Did you access this file through the Diamond
20 database we were discussing earlier?

21 A Yes.

22 Q So you were, in fact, reviewing an
23 electronic production of records from SoCalGas's well
24 file provided in response to a data request, not a
25 physical well file, correct?

1 A Correct.

2 Q And you reviewed all 1,597 pages in the
3 weekend as well as the data responses we discussed
4 earlier and the Blade report prior to your submission
5 of your testimony on November 22nd?

6 A Yes.

7 Q Did you also look at the data responses, the
8 responses to Data Request 16, that same weekend?

9 A Yes.

10 Q Did you look at the underlying records
11 produced in response to Data Request 16, a document
12 production?

13 A I had a hard copy, I think, of the whole
14 response. But I haven't verified that against the
15 electronic response.

16 Q Do you recall receiving a privilege log in
17 connection with the Data Request 16 response?

18 MR. GRUEN: I'm going to --

19 Just a clarification. If this is asking
20 about testimony, if that's where this is going, if
21 the witness could be referred to testimony, the
22 testimony where the questions are going to be
23 directed, I'll just note that.

24 MR. STODDARD: I'll refer to the email.

25 Q The last sentence of the email states

1 "I also looked at the responses to Data Request 16.
2 These are records related to the well-kill efforts,
3 so post October 2015."

4 And in connection with that, I am wondering
5 what you reviewed and what you had related to Data
6 Request 16, including --

7 Well, my last question, which is do you
8 recall receiving a privilege log related to
9 Data Request 16 and did you review it at that time?

10 A I don't really remember that there was a
11 privilege log, but it could be bound in the front of
12 that document.

13 So what I received was a bound document that
14 was about this thick that was all DR 16. And it was
15 Bates paged through it. I just don't -- I wouldn't
16 spend any time looking at a privilege log if there
17 was one at the front of it. It could have been
18 there.

19 And the document contained a lot of copies
20 of emails, a lot of duplicates of emails, and
21 Boots & Coots daily records, not particularly well
22 organized, and some -- I think some communications
23 from Halliburton, maybe some technical records from
24 them, like a proposal or something.

25 Q Okay. Do you recall there being

1 supplemental responses to Data Request 16 included in
2 the material you reviewed?

3 A I don't think anything was labeled that way.
4 I think it was just the actual documents that were
5 bound in that volume.

6 Q Okay. In response to my question regarding
7 whether you reviewed a privilege log associated with
8 SED 16, you stated that "I just don't" -- "I wouldn't
9 spend any time looking at a privilege log if there
10 was one at the front of it."

11 Since then, have you reviewed a privilege
12 log associated with SED 16?

13 A I may have looked at it in -- on -- in the
14 database. Have not really given it any thought.

15 Q Okay. Have you reviewed any other version
16 of the well file aside from the version that you
17 describe in this email?

18 A I think I've seen at least two other
19 versions in the response sets.

20 Q In SED's Diamond database?

21 A Yes.

22 Q Have you ever reviewed the well files in
23 person?

24 A No.

25 Q Have you ever reviewed Blade's copy of the

1 well file?

2 A Not yet.

3 Q Is it your understanding that SED is in
4 possession of Blade's version of the well file?

5 A I believe they have it. I haven't seen it
6 yet.

7 MR. STODDARD: I'm going to note for purposes of
8 the record that SED produced this document to us, but
9 we didn't get a separate production of the initial
10 email.

11 MR. GRUEN: I'm sorry, I can't --

12 MR. STODDARD: We got the response.

13 MR. GRUEN: I'm not clear when you say "this
14 document," I'm not clear what --

15 MR. STODDARD: Referencing Exhibit 1-14.

16 MR. GRUEN: Okay.

17 MR. STODDARD: We received --

18 You produced this document to us, but if
19 you'll see, as you pointed out, this is two separate
20 emails.

21 MR. GRUEN: Right.

22 MR. STODDARD: And the bottom email, which
23 includes -- which is the email from Margaret to SED,
24 we don't have an independent version of that; so we
25 aren't able to tell --

1 One of the reasons I asked about who added
2 the "subject" line is we can't tell who made that
3 designation based on this document and whether it was
4 included with hers, because hers doesn't include the
5 data at the top, including the subject line or any
6 other data.

7 MR. GRUEN: Okay.

8 So for the record, the document does note
9 "On November 17, 2019 at 9:25 p.m. Margaret Felts,"
10 and it has her email address, "wrote:" And then it
11 provides the text that was being referred to and
12 asked about.

13 MR. STODDARD: That's correct.

14 MR. GRUEN: I'm noting that just for the record.

15 And I think you're asking for us to produce
16 that, just for the record.

17 MR. STODDARD: Yes.

18 MR. GRUEN: I think you're asking us to produce
19 that email, the original email; am I tracking
20 correctly?

21 MR. STODDARD: That's correct.

22 MR. GRUEN: Okay. We can do that.

23 Just for the record as well -- strike that.

24 We'll go ahead with that. That's fine.

25 Thank you.

1 MR. STODDARD: All right. I'd like to mark
2 Exhibit 1-15.

3 (Deposition Exhibit 1-15 was
4 marked for identification and is
5 attached hereto.)

6 BY MR. STODDARD:

7 Q Ms. Felts, do you recognize this document?

8 A Yes.

9 Q And this is an email from you to Mr. Gruen
10 dated November 18th. It's Monday, the day after the
11 email that was marked Exhibit 1-14. And the subject
12 line is "Confidential Attorney Work Product."

13 Do you see that?

14 A Yes.

15 Q Does this --

16 Did you add the "Confidential Attorney Work
17 Product" subject line in this email?

18 A I could have added it, or I could have just
19 replied to another email and added the text below.
20 Sometimes I do that. I just pick out the latest
21 email that Darryl sent and just reply, and use the
22 same heading --

23 Q So you might --

24 A -- and send it.

25 Q So you might have deleted the other email in

1 this document?

2 A Yes.

3 Q Did you collect this document and provide
4 this to Darryl for purposes of production to
5 SoCalGas?

6 A I think Darryl probably sent it from his
7 database, his email. I mean, produced it to you.

8 Q Okay. So do you commonly delete emails when
9 you're replying in chains? Is that a typical
10 practice or occasional?

11 A If I'm just looking for the latest email
12 address for a person, that's what I do, I just pick
13 one off of the most recent email and reply to it.

14 Q So in other words, if his email to you was
15 on a different issue, you might --

16 A Yes.

17 Q -- delete that but use it for purposes of
18 responding to him --

19 A Yes, that's correct.

20 Q -- or sending --

21 Ms. Felts, do you see where it says
22 "Attachments: 2019 Draft Testimony"?

23 Do you see that?

24 A Yes.

25 Q You were sending Darryl a draft of your

1 testimony, correct?

2 A Yes.

3 Q Do you recall if this was the first draft
4 that you sent him?

5 A I expect this was probably the first draft,
6 and it was a draft of the part of the testimony
7 related to records or recordkeeping.

8 MR. STODDARD: Okay. We're going to introduce
9 Exhibit 1-16.

10 (Deposition Exhibit 1-16 was
11 marked for identification and is
12 attached hereto.)

13 BY MR. STODDARD:

14 Q Do you recognize this document, Ms. Felts?

15 A Yes.

16 Q Is this the document that you previously
17 referenced as your draft testimony regarding
18 recordkeeping issues?

19 A I expect that's --

20 This is it, yes.

21 Q And when you prepared this testimony you had
22 reviewed the version of the well file in the Diamond
23 database?

24 A Yes.

25 Q Which again was an electronic document

1 production, correct?

2 A Yes.

3 MR. STODDARD: Thank you.

4 We're going to introduce Exhibit 1-17.

5 (Deposition Exhibit 1-17 was
6 marked for identification and is
7 attached hereto.)

8 BY MR. STODDARD:

9 Q Do you recognize this document?

10 A Yes.

11 Q It's an email from Darryl Gruen sent on
12 November 19th to you with copies on Amy Yip-Kikugawa,
13 Nick Sher, and Karen Shea, correct?

14 A Yes.

15 Q And this was sent a day after you sent him
16 your initial draft; is that correct?

17 A Yes.

18 Q And it included the subject line, "Attorney-
19 client privilege confidential," with the proceeding
20 number and SED Aliso testimony; is that correct?

21 A Yes.

22 Q Do you believe that this was a response to
23 your email or one that originated from Darryl?

24 A I think it probably originated from Darryl.

25 Q And it identifies an attachment.

1 The file name is the proceeding number "SED
2 Aliso Testimony.docx," correct?

3 A Yes.

4 Q And the subject line, and the contents says
5 there is testimony attached?

6 A Yes.

7 MR. STODDARD: We're going to introduce
8 Exhibit 1-18.

9 (Deposition Exhibit 1-18 was
10 marked for identification and is
11 attached hereto.)

12 BY MR. STODDARD:

13 Q Do you recognize this document, Ms. Felts?

14 A Yes.

15 Q What is it?

16 A It looks like the draft testimony that
17 Darryl sent me.

18 Q And to confirm, you did not write this
19 testimony, correct?

20 A Let's see, it looks like this version does
21 not include the part of the testimony that I wrote,
22 which was the records section; so that's correct.

23 Q And the records section that you prepared
24 would eventually be inserted at the end, is that
25 correct, toward the end?

1 A I think it's before Section C.

2 Q Was this your first time --

3 MR. GRUEN: Just a clarification, to the extent
4 that we're starting to creep into the actual
5 questions about the testimony itself, so I just
6 ask --

7 I'd reiterate just to the extent that the
8 questions go there, if she could be directed to the
9 part of the testimony where the questions are being
10 asked.

11 MR. STODDARD: Understood.

12 THE WITNESS: Let's look at this.

13 Okay. So looking at Exhibit 1-7, it was
14 inserted as Section 3 at the end of the testimony.

15 MR. STODDARD: Thank you.

16 Q Was this the first time you saw SED's
17 testimony?

18 A Yes.

19 MR. GRUEN: And just clarification, when you say
20 "was this the first time," what time?

21 MR. STODDARD: The date that she received this
22 email, which was as established in Exhibit 1-17,
23 Tuesday, November 9, 2019.

24 THE WITNESS: November 19th.

25 MR. STODDARD: November 19, 2019.

1 THE WITNESS: Okay.

2 BY MR. STODDARD:

3 Q And that day was the first day that you saw
4 at 5:15 p.m. SED's draft testimony?

5 A Yes.

6 Q Do you know whether they were preparing it
7 immediately prior to sending it to you, or whether it
8 had been in existence for a while?

9 A I don't know.

10 Q And do you know who authored it?

11 A No.

12 Q What was your initial reaction?

13 A Well, it's not the type of report that I
14 would write, but it was drawn strictly from the Blade
15 report, and so I felt like --

16 I think it adequately represented what the
17 Commission was -- or what SED was looking at for
18 violations.

19 Q Why was it not the kind of report that you
20 would write?

21 A Oh, I might have had done more research in
22 the data and been able to add a little bit more depth
23 to some of the discussion.

24 Q So it was a little bit thin?

25 A Yes.

1 Q Did you read it in its entirety when you
2 received it?

3 A Yes.

4 Q Aside from your concerns about the lack of
5 support, do you recall whether you agreed with all of
6 the assertions?

7 A I had some concerns about some of them, one
8 of them being the --

9 I think there is a statement that was
10 carried over from Blade that said that there were no
11 indications of a leak on -- ever on SS-25, and my
12 review of the records in the well file suggested that
13 there had been indications of leaks on the shoe on
14 that well. And then I was -- I thought I had that
15 turned off.

16 There was another area that I wasn't --

17 Oh, I wasn't real sure about issues related
18 to bottom hole pressure, and so I went back and
19 reviewed that more carefully in the Blade report and
20 agreed with that. I think those were the main areas
21 that I went back and looked at.

22 I felt like I had not read all of the
23 supplemental reports for the Blade report at that
24 time, but I did look at the areas -- the supplemental
25 reports that supported the areas that I wanted to

1 check on. And I did feel like Blade was very
2 thorough in their investigation and felt like I could
3 support the conclusions that were pulled over into
4 this testimony.

5 Q Did you review all of the supplemental Blade
6 reports --

7 Have you reviewed all of the supplemental
8 Blade reports now?

9 A There is the last volume having to do with
10 casings, whether it's some technical sessions of that
11 that I haven't read yet, or actually I skimmed them,
12 but I feel like I should go back and read them a
13 little more closely.

14 Q When did you complete your first pass on the
15 supplemental reports?

16 A Mid-January.

17 Q I'm going to direct you to page 36 of
18 Exhibit 1-18. And you see there is a comment there
19 from Darryl, and it's on the sentence that
20 reads "External well-control specialists provide
21 necessary experience and expertise; however,
22 underground storage operators should also have
23 personnel with the necessary skills to monitor and
24 manage external specialists, a core skill for gas
25 storage operator."

1 Do you see that?

2 A Yes.

3 Q And then the comment --

4 Mr. Gruen states "Margaret, do you have the
5 expertise to say something along the lines of
6 'underground storage operators including SoCalGas
7 should have personnel with the skills to do XYZ, even
8 if they rely on third party well-control specialists
9 such as Halliburton to do ABC. And multiple kill
10 attempts demonstrate..?'"

11 Do you see that?

12 A Yes.

13 Q Did you discuss that comment with Mr. Gruen?

14 A I don't remember it, but I probably did.

15 Q Did you understand Darryl to be asking you
16 to expand upon the highlighted sentence and provide
17 further detail?

18 A No.

19 Q What did you understand Darryl to be asking?

20 A If I had the expertise to support a
21 statement that he had written there or something like
22 it.

23 Q Do you?

24 A As a petroleum engineer, I think I could say
25 that SoCalGas should have somebody with that type of

1 experience, petroleum engineering, to oversee their
2 subcontractors or their contractors.

3 Q And what type of experience is that?

4 A Some sort of reservoir engineering.

5 Q So --

6 A Or drilling or both.

7 Q So if they have --

8 If SoCalGas has somebody who is a reservoir
9 engineer, a drilling engineer, then that would be
10 sufficient?

11 A Yes. Yes, I think they do.

12 MR. STODDARD: All right. Thank you.

13 Let's see if I can get it right this time.

14 I'm going to introduce Exhibit 1-19.

15 (Deposition Exhibit 1-19 was
16 marked for identification and is
17 attached hereto.)

18 BY MR. STODDARD:

19 Q Ms. Felts, do you recognize this document?

20 A Yes.

21 Q This is an email from Darryl Gruen to you on
22 Wednesday, November 20th, 2019; so a day after he had
23 transmitted the prior draft that we just discussed,
24 and it is transmitting -- and it includes another
25 attachment of -- with the same file name -- no, not

1 quite the same file name, strike that.

2 It includes an attachment entitled
3 proceeding number "SED Aliso Testimony" with the
4 date; is that correct?

5 A Yes.

6 Q And the content of the email reads "Aliso
7 testimony attached. Darryl."

8 I'm going to introduce Exhibit 1-20.

9 (Deposition Exhibit 1-20 was
10 marked for identification and is
11 attached hereto.)

12 BY MR. STODDARD:

13 Q Ms. Felts, do you recognize this document?

14 A Yes.

15 Q This is a revised draft that had been sent
16 by Darryl Gruen on November 20th of the SED portion
17 of the testimony. Please turn to page 37.

18 A Okay.

19 Q You'll note that the comment --

20 So it's slightly formatted differently
21 because of a change in font size and some other
22 formatting changes. But if you look up at the second
23 sentence on the top of the page, that same sentence,
24 "External well-control specialists provide," is there
25 without the comment.

1 A Oh, yes.

2 MR. GRUEN: I'm sorry, I'm not tracking.

3 Is there a comment that is there? My copy,
4 I don't see one.

5 MR. STODDARD: Sure.

6 Maybe it would be easier to compare with
7 Exhibit 1-18, and reference, again, on Exhibit 1-18
8 page --

9 MR. GRUEN: Oh, I see.

10 MR. STODDARD: -- 36.

11 My point is this is the same sentence even
12 though the pagination is different, the comment is
13 gone.

14 Q Does this --

15 Do you recall now or does this suggest that
16 you and Darryl had a conversation in the interim
17 regarding his question about your expertise?

18 A All right. Let me look up -- it looks like
19 the same statement.

20 Q Okay. Thank you.

21 Do you know why Mr. Gruen sent this version
22 less than a day later after sending the initial
23 draft?

24 A This draft has a recordkeeping section in
25 it.

1 MR. GRUEN: I'm going to just note an objection
2 that that --

3 Well, I'll strike the objection.

4 Go ahead.

5 BY MR. STODDARD:

6 Q Ms. Felts, can you direct me to the portion
7 of the testimony that has the recordkeeping section
8 in it?

9 A Okay. Well, you're right. It only has a
10 heading for it on page 68.

11 Q Did you write that heading or did -- or did
12 it appear in this draft or the prior draft?

13 A I expect someone else probably wrote it or
14 maybe pulled it off of a draft I sent.

15 MR. STODDARD: Okay. Moving on.

16 Introducing Exhibit 1-21.

17 (Deposition Exhibit 1-21 was
18 marked for identification and is
19 attached hereto.)

20 BY MR. STODDARD:

21 Q Ms. Felts, do you recognize this document?

22 A Yes.

23 Q This is an email from you to Darryl Gruen,
24 no one is copied, and it was sent on Wednesday,
25 November 20, 2019 and the subject line is "Edits to

1 Testimony." And you see in your response to Darryl
2 where you state "Darryl, I can't get the tracking to
3 work. It's possible it is showing on your computer,
4 but I'm hesitant to put the work into it is doesn't
5 show."

6 Would I be correct that that is supposed to
7 read "but I'm hesitant to put the work into it if it
8 doesn't show"?

9 A Yes.

10 Q The next sentence says "So I'm going to
11 finish my testimony, and you can go ahead and use the
12 SED testimony as is. I don't think I can sponsor it
13 as written."

14 Do you see that?

15 A Yes.

16 Q Were you referring to the draft that Darryl
17 sent the day before that we were just looking at,
18 Exhibit 1-20?

19 A I don't know if I'm referring to that one or
20 the one prior that you had provided. Things were
21 going back and forth pretty quick.

22 And I know that I was having a problem doing
23 the tracking on my computer, my PC, but I got that
24 resolved eventually, and I believe I had some
25 concerns that we may have just walked through over

1 the phone and resolved.

2 Q And do you recall what your concerns were?

3 A I think -- I think my main concern may have
4 been the issue with the statements in the testimony
5 that Well SS-25 had never exhibited a leak.

6 Q So over that single issue you were
7 indicating in this email that you weren't going to
8 sponsor it as written and suggesting that Darryl go
9 ahead and use the SED testimony as is?

10 A It's possible. I'm usually pretty picky
11 about those things, and that was a fairly inaccurate
12 statement.

13 Q Were there discussions about what SED would
14 do if you didn't sponsor the testimony?

15 A Yes.

16 Q And what was discussed?

17 A I -- I don't remember exactly, but I believe
18 there was discussion of releasing it without a --
19 someone supporting it.

20 Q Releasing it without someone's name on it?

21 A Yes.

22 Q Was there any discussion of alternative
23 witnesses?

24 A No.

25 Q So after you received this email, as far as

1 you recall, you think you spoke with Darryl on the
2 phone?

3 A Well, to correct you, I sent this email. I
4 didn't receive it.

5 Q I'm sorry, thank you for the correction.

6 A And I believe we probably discussed it over
7 the phone.

8 MR. STODDARD: I'll introduce Exhibit 1-22.

9 (Deposition Exhibit 1-22 was
10 marked for identification and is
11 attached hereto.)

12 BY MR. STODDARD:

13 Q This is an email from --

14 Do you recognize this document?

15 A I don't really recall it, but it appears I
16 wrote it.

17 Q It's from you to Darryl Gruen dated
18 Wednesday, November 20, 2019, 7:39 p.m., and the
19 subject line is "SED Testimony Cleaned and marked up
20 versions."

21 Do you see that?

22 A Yes.

23 Q And it includes two attachments. One, it
24 appears to be a clean version, and one that says
25 "With Original Footnotes."

1 Do you see that?

2 A Yes.

3 Q You said "Still have to merge mine into this
4 one."

5 And you are referring there to the
6 documents -- the document testimony that you drafted?

7 A The records section.

8 Q "The records section"?

9 A Yes.

10 Q And this one you're referring to the
11 testimony that was prepared by Mr. Gruen?

12 MR. GRUEN: I'm sorry. Objection to the
13 characterization of the testimony calling testimony
14 as "prepared by Mr. Gruen."

15 That assumes facts not in evidence, and it's
16 a mischaracterization of Ms. Felts' testimony.

17 MR. STODDARD: Restating.

18 Q You were merging the section you prepared on
19 records, you were going to merge that one into the
20 version prepared by SED?

21 A Well, I don't know who prepared it, but it
22 was provided to me by Darryl Gruen.

23 Q And the email reads "The Clean version has
24 all changed except accepted footnote numbers
25 adjusted. The other version shows all comments,

1 edits and retains all original footnotes. Margaret,"
2 correct?

3 A Yes.

4 MR. STODDARD: We might need to take a break for
5 a moment.

6 No, we don't.

7 MR. GRUEN: Jack, we can continue this.

8 Potentially maybe this might be -- or assume
9 might be a good time for a --

10 MR. STODDARD: Let's just take a quick break.

11 MR. GRUEN: Do you want to do that?

12 MR. STODDARD: Yeah, we've been going for
13 another hour or so.

14 THE VIDEOGRAPHER: Just a moment, please.

15 We are off the record at 2:30 p.m.

16 (Off the record.)

17 THE VIDEOGRAPHER: We are back on the record at
18 2:47 p.m.

19 MR. STODDARD: Okay. Picking up where we left
20 off.

21 Just to circle back, we had just discussed
22 Exhibit 1-22, which to recap included two
23 attachments, which I'm now going to introduce.

24 The first we'll mark as Exhibit 1-23.

25 (Deposition Exhibit 1-23 was

1 marked for identification and is
2 attached hereto.)

3 BY MR. STODDARD:

4 Q Do you recognize this document?

5 A Yes.

6 Q This is a first attachment to the email
7 marked as Exhibit 1-22, and this is the clean version
8 of SED's revised draft testimony which you revised,
9 correct?

10 A Yes.

11 MR. STODDARD: Introduce Exhibit 1-24.

12 (Deposition Exhibit 1-24 was
13 marked for identification and is
14 attached hereto.)

15 BY MR. STODDARD:

16 Q Do you recognize this document, Ms. Felts?

17 A Yes.

18 Q And is this the redline version of the
19 testimony that you revised combining SED's draft with
20 your draft and which was --

21 I'm sorry.

22 A Go ahead.

23 Q -- which was attached to the email now
24 marked as Exhibit 1-22.

25 Strike that. Correction.

1 This is your redline of SED's portion of the
2 testimony. It does not include the records section,
3 but this is the redlined version of what was attached
4 to the email marked as Exhibit 1-22?

5 A Yes.

6 Q Thank you.

7 I'd like to note for purposes of the record
8 that this document was missing from SED's initial
9 document production, and we had to specifically
10 request it and received it only two days prior to the
11 deposition.

12 Turning to page 1 of the document, page 1 of
13 the revised draft testimony, which is actually five
14 pages into the document after the Table of Contents.

15 Do you see the redline through in the
16 introduction where it states "Drawing on the Blade
17 report and information obtained in its own
18 investigation, this testimony identifies numerous
19 safety (and health) violations of PUC Section 451
20 related to the uncontrolled release of hydrocarbon
21 gas or methane for 111 days from Southern California
22 Gas Company's (SoCalGas) Aliso Canyon Well SS-25
23 (SS-25 incident) including many different causes
24 identified in the Blade Report from which the SS-25
25 incident resulted"?

1 Do you see that?

2 A Yes.

3 Q And that you struck the language "including
4 many different causes identified in the Blade report
5 from which the SS-25 resulted," is that correct?

6 A Yes.

7 Q Why did you strike that language?

8 A Probably because I thought it was redundant.

9 Q Okay. Please turn to page 11.

10 Do you see at the top where you deleted the
11 discussion of groundwater as a source of corrosion?

12 A Yes.

13 Q And down at the bottom of the page 11 where
14 there is a sentence regarding groundwater and
15 microbes, "a form of Archaea caused the corrosion"?

16 A Yes.

17 Q And then below that is another sentence
18 regarding MIC as the mechanism of corrosion; do you
19 see that?

20 A Yes.

21 Q And that those sentences are all deleted in
22 your redline; is that correct?

23 A Yes.

24 Q And why did you delete those sentences
25 related to microbial -- Blade's findings of microbial

1 corrosion?

2 A Well, at the time I felt like the
3 information that was drawn from the -- it was drawn
4 primarily from the main report, and I had not read
5 the details of their analysis, their lab analysis
6 that showed how they came to that conclusion. And so
7 I just wasn't real solid on supporting those
8 statements at that time; so I deleted them.

9 Since then, I've looked at all of those
10 reports and read the underlying investigation data,
11 and I could have supported it had I had the time to
12 look at those; so I think it was sound science.

13 Q Okay. Will you be amending your opening
14 testimony to add those findings back in?

15 MR. GRUEN: I'm going to object to that in that
16 it calls for attorney work product and
17 attorney-client privilege.

18 That's a deliberation that is still being
19 considered by SED.

20 BY MR. STODDARD:

21 Q Ms. Felts, these portions of the testimony
22 that you -- of the draft testimony that you deleted
23 related to microbial corrosion, did you put them back
24 into the testimony that was served, do you recall?

25 A I don't remember.

1 Q Referring back to Exhibit 1-7. Please take
2 a moment to review and just confirm whether you added
3 any of that language back in.

4 MR. GRUEN: Just so I'm clear, the question is
5 to compare page 11 of Exhibit 1-24 with comparable
6 page on Exhibit 1-7?

7 Am I tracking correctly?

8 MR. STODDARD: I'm asking more generally
9 whether --

10 I'm giving her time to flip through the
11 relevant sections of the document to identify whether
12 she understands -- or whether she added this language
13 back into the document, not particularly page 11 of
14 the document.

15 MR. GRUEN: I follow. Okay.

16 THE WITNESS: It doesn't look like I added it
17 back in.

18 BY MR. STODDARD:

19 Q But now since the opening testimony, you've
20 reviewed the relevant sections of the Blade report,
21 and you're more comfortable with their conclusions on
22 that issue; is that correct?

23 A Yes.

24 Q So would it be fair to say that at the time
25 that you served your opening testimony, you hadn't

1 considered the entirety of the Blade report?

2 A Some of the technical supplements to the
3 Blade report were -- I had only glossed over, and so
4 I felt like I really needed to go back and look at
5 that in detail.

6 Q I'm going to direct you to page 42 of
7 Exhibit 1-24.

8 A Okay.

9 Q Same question here, do you see where it says
10 "Some of the 7-inch casing connections were seeping
11 gas at the outside of the casing and then the carbon
12 dioxide in the gas was likely a nutrient for the
13 methanogens," and you deleted this language, correct?

14 A Yes.

15 Q And separate from the reference of
16 methanogens, did you also doubt Blade's conclusions
17 regarding the 7-inch casing connections?

18 MR. GRUEN: I'm going to object to the
19 characterization of her testimony as doubting Blade's
20 conclusions.

21 The objection is that it's a
22 mischaracterization of her testimony thus far.

23 MR. STODDARD: All right, I'll restate it.

24 Q Ms. Felts, did you have similar concerns
25 related to those you had with respect to the section

1 on MIC related to Blade's conclusions regarding the
2 7-inch casing connections?

3 MR. GRUEN: Same objection.

4 I think for clarification, she --

5 Well, I'll just note the same objection.

6 It's concerns with the conclusions is a misstatement
7 of testimony.

8 BY MR. STODDARD:

9 Q Ms. Felts, why did you strike that language
10 that I referred to?

11 A Okay. So the statement is that there was
12 seeping gas from a 7-inch casing which then fed or
13 served as a nutrient to the microbial community that
14 was causing the problem, so -- or causing the
15 corrosion.

16 The main report lacked substantive support
17 for that. And so it was necessary to go back and
18 understand the tests that Blade ran on the 7-inch
19 casing joints that showed or proved that there was
20 leakage.

21 And so I needed to completely understand
22 that part of the investigation to support that
23 statement, and I -- had I really felt well about
24 that, I would have also felt good about the seeping
25 gas serving as a nutrient; so I deleted both sections

1 just because I hadn't gotten to a sound understanding
2 of what they had done that caused them to make that
3 statement in the main report.

4 Q And now you feel comfortable having reviewed
5 that section of the report that Blade's conclusions
6 with respect to microbially influenced corrosion are
7 well supported?

8 A I think they did a pretty good job of the
9 review and the science.

10 MR. GRUEN: I'm sorry, she wasn't finished with
11 her answer.

12 THE WITNESS: That's okay.

13 BY MR. STODDARD:

14 Q And that the --

15 And their conclusion that there may have
16 been Archaea microbes?

17 A I really don't have an alternate opinion
18 other than what they concluded on that. And they
19 base that on their scientific research and knowledge;
20 so I think it's probably a good conclusion.

21 There may be something else out there, but
22 I'm not aware of it.

23 Q And you have faith in Blade's scientific
24 process and conclusions?

25 A I do. I think they did a good job.

1 Q But you didn't speak with anybody at Blade
2 or interview anyone at Blade, correct?

3 A No, I didn't.

4 Q Did you evaluate the credentials of the
5 Blade personnel?

6 A I believe I did look at their credentials,
7 and also I think I looked up some information about
8 them online just to see what type of work they've
9 done before, and it seemed like they had a fairly
10 good history in the industry.

11 Q Did you review the description of Blade's
12 sampling and microbial analysis protocols?

13 A Yes.

14 Q And you felt that those were sufficient and
15 complied with standard procedure?

16 A I think so, based on my experience.

17 Q I'm going to direct to you page 20 of
18 Exhibit 1-24.

19 A Okay.

20 Q Do you see the sentence in the second full
21 paragraph where it says "The SS-25 temperature and
22 noise logs had never shown an anomaly related to
23 casing integrity"?

24 A Yes.

25 Q And is that your comment in the margin?

1 A Yes.

2 Q And the comment reads "I know this is a
3 quote. However, you should know that temp and noise
4 surveys on SS-25 showed one or more leaks from 1978
5 to 2012. But, these leaks were not shallow."

6 What was the basis for that comment?

7 A I had looked at the well file, and I was
8 just reporting that there was something in the well
9 file that showed that there were leaks.

10 Q And what was that something?

11 A Temperature surveys, primarily. I believe
12 there is one or more noise surveys.

13 Q And you think --

14 You believe that both the temperature
15 surveys and the noise logs showed leaks?

16 A There is no question that the temperature
17 logs show leaks. The noise surveys seemed like they
18 were inconclusive. Sometimes I think because they
19 ran the noise logs under the wrong circumstances.

20 Q And this was based on your review of the
21 electronically produced logs that were in SED's
22 Diamond database?

23 A Yes.

24 Q And you disagreed with Blade on this point,
25 correct?

1 A Yes.

2 Q Is it your understanding that Blade's
3 investigation was conducted over a period of several
4 years?

5 A Well, from 2015 to at least 2018.

6 Q And earlier you stated that you believed
7 Blade did a very thorough job, correct?

8 A I think they did. I -- my -- I think --

9 And this is just my probably assumption is
10 that they didn't have access to the same information
11 I've had access to when they came to this conclusion.
12 I don't know that for a fact. I just know they
13 received some really late data from SoCalGas. And
14 it's possible that they were basing their conclusions
15 on DOGGR records, where they would not have seen
16 this.

17 Q And, again, you did not review the records
18 that Blade Collected or any of the productions and
19 data responses that SoCalGas sent to Blade in
20 connection with preparing your testimony, correct?

21 A That is correct.

22 Q Or in connection with this comment, correct?

23 A That's correct.

24 Q If Blade hadn't reviewed these records --
25 actually, strike that.

1 And these records, you found them in the
2 well file that was available in the Diamond database,
3 which included records related to SS-25, correct?

4 A Yes.

5 Q If Blade didn't review the records related
6 to SS-25, do you believe that their investigation
7 would be thorough?

8 A For what --

9 For the primary work that Blade was doing, I
10 don't know if they needed the historical records.
11 They needed the construction records; so they had
12 what they needed from the Department of Oil and Gas
13 records that were on file there.

14 This was just one area where for some reason
15 they either were told or came to the conclusion that
16 there was no -- had not been any prior leaks on that
17 well. I don't --

18 There is no question in my mind that if they
19 had looked at the records that I looked at, the
20 temperature surveys, they wouldn't have said that; so
21 I have to conclude they didn't see them.

22 Q And do you believe that the alleged fact
23 of historic leaks is relevant to the alleged
24 451 violations in your testimony?

25 MR. GRUEN: I'm going to object that that calls

1 for legal conclusion.

2 I just am noting an objection for the
3 record.

4 And more broadly just to the extent that
5 there are questions that go to any violations in
6 testimony that asks for a legal basis for violations,
7 we're going to restate an objection. And we'll note
8 discussion in the pre-hearing conference related to
9 that.

10 But I wanted to note that objection for the
11 record.

12 Having said that, she can answer the
13 question.

14 THE WITNESS: Can you ask the question again?

15 BY MR. STODDARD:

16 Q Is your opinion regarding the presence of a
17 historic leak dating back to 1978 at SS-25 relevant
18 in your view to your alleged -- to the alleged
19 violations of 451 in your testimony?

20 Let me restate that.

21 A Okay.

22 Q If there are no leak --

23 If there was no historic leak at SS-25, is
24 that a mitigating factor in your view related to
25 SoCalGas's O&M practices at SS-25?

1 A The reason for my concern in making the
2 statement that there was no leak was just that it was
3 an inaccurate fact in a report, and I'm a records
4 person, so I like things to be accurate and based on
5 records. And certainly since my testimony -- the
6 written part of my testimony that went into this
7 document had to do with recordkeeping, I was
8 particularly sensitive to the fact that everything in
9 this testimony should be accurate as it was recorded
10 in records.

11 And in this particular case, the record file
12 for SS-25 included a number of annual surveys that
13 documented a leak at the bottom shoe of the well.
14 And because this particular file excluded any
15 analysis or memos about that ongoing leak, whereas
16 other well files including 25A and 25B had that kind
17 of -- those kind of notes in them, I felt like it was
18 something that I should call attention to, at least
19 among the PUC people.

20 It has, I think, little bearing on the --
21 the violations that were cited one way or the other.

22 Q Okay. You stated that you are a records
23 person so you like to have things be accurate and
24 based on records, correct?

25 A I like them to -- statements to accurately

1 reflect what is in the record.

2 Q And this statement, based on your review of
3 records, you believed Blade was incorrect?

4 A Blade may have been correct on what they
5 were looking at. It was incorrect based on the
6 documents review I had done.

7 Q Did you endeavor to look at the underlying
8 records on Blade's other findings in the Blade
9 report?

10 A I think I considered everything that they
11 made available. And certainly looked at -- looked at
12 the testimony in light of the records that I had
13 available to me, and this was the one that I had the
14 most concern with.

15 Q Did you communicate to SED which records you
16 thought would be necessary for purposes of being able
17 to support the testimony, or was it simply accepting
18 what SED gave you and limiting your review to that?

19 A I'm not sure I understand your question.

20 Q Let me take a specific example.

21 So you indicated, and correct me if I'm
22 misstating you, but you indicated that you disagreed
23 with Blade's conclusions regarding the -- their
24 interpretation of the temperature logs or their
25 statement regarding the historical noise logs at

1 SS-25. You disagreed with that based on your review
2 of the records, correct?

3 A What I disagreed with was the statement the
4 SS-25 temperature and noise logs had never shown an
5 anomaly relating to casing integrity. That's the
6 statement I disagree with.

7 Q And that was based on your review of
8 records?

9 A Yes, which show anomalies relating to casing
10 integrity; so the statement can't be correct. Now,
11 it may not --

12 You said that I disagreed with Blade's
13 interpretation of logs. I don't know that they had
14 access to those logs.

15 Q Did that raise any doubts in your mind as to
16 Blade's other findings or conclusions?

17 A No.

18 Q So taking an example on page 17 of
19 Exhibit 1-24 regarding failure to implement a risk
20 assessment program, it cites to the Blade report in
21 the first sentence, "Corrosion was not detected on
22 SS-25 because the 7-inch casing wall thickness on the
23 SS-25 had never been inspected."

24 Did you verify that through inspection of
25 records?

1 A There is no evidence of an inspection of the
2 wall thickness in the SS-25 well file.

3 Q And with respect to Blade's identification
4 of a failure to implement a risk management plan as a
5 root cause, did you confirm their conclusion that it
6 hadn't been implemented based on a review of records?

7 A Yes, there is no risk assessment program or
8 any documentation of a risk assessment in the well
9 file.

10 Q Did you look outside of the well file?

11 A We asked many -- in many different ways for
12 risk assessments and have consistently been told that
13 there are no records.

14 Q That's based on your review of which
15 documents?

16 A Well --

17 Q You said "we asked."

18 Who are you referring to?

19 A I'm referring to SED in data requests.

20 Q And those are data requests that were made
21 available to you through the Diamond database?

22 A I wrote some of those discovery questions,
23 and the answers came back that there were none.

24 Q Turning back to the temperature logs.

25 What experience do you have with respect to

1 interpretation of temperature logs?

2 A I studied that in petroleum engineering, and
3 other than that, none --

4 Nothing specific. It's not a fine science.

5 Q And could a temperature log be indicative --

6 Could a temperature log anomaly be
7 indicative of something other than a leak?

8 A Well, I think maybe, but these -- these
9 temperature logs in the SS-25 well file actually have
10 notes on them that say "potential leak." It's pretty
11 obvious, and the temperature survey, the numeric
12 temperature survey printout shows a reduction in
13 temperature, so --

14 And if you compare that well log or that
15 well file and the temperature surveys in that well
16 file to other well files at Aliso, you will see that
17 a similar thing was happening at other wells, and
18 there was responsiveness to it by SoCalGas.

19 For some reason not so on -- or it doesn't
20 appear so in the well file for SS-25. It's not a
21 one-time thing in this well. It was happening across
22 Aliso.

23 Q You mentioned the temperature reading spike
24 that would occur and indicate an anomaly --

25 A Actually a drop in temperature.

1 Q Right.

2 A Yes.

3 Q So the drop in the temperature that you can
4 see on the temperature log --

5 A Yes.

6 Q -- correct, could that possibly be due to
7 the presence of water behind the casing?

8 A Not likely at the shoe where this leak was
9 occurring. It's very a common leak in these wells.

10 Q And do you recall what depth that was?

11 A Probably very close to the bottom, so it
12 would be the bottom shoe.

13 So this well was about, I don't remember
14 exactly, 8300 feet deep; so it would have been around
15 that depth.

16 Q Okay. Direct you to page 28. Again, here
17 same issue, statement regarding annual temperature
18 and noise logs, and you deleted the clause that says
19 "no anomalies were found," and included a comment
20 that says "Wrong, we could replace the Blade footnote
21 with SS-25 well file."

22 A Okay.

23 Q Again, you're disagreeing with Blade here.

24 Do you recall any other instances where you
25 disagreed with Blade?

1 MR. GRUEN: I'm going to object. Asked and
2 answered.

3 THE WITNESS: Well --

4 MR. GRUEN: She can answer the question, but
5 it's been asked and answered before.

6 THE WITNESS: This is --

7 I mean, there might be other places in the
8 testimony where I struck the thing having to do with
9 the temperature survey, but I think that was -- that
10 and the MIC issue were the two things.

11 BY MR. STODDARD:

12 Q I'm going to direct you to page 30, the
13 sentence says "Kill operations where a fluid being
14 pumped into a well while the gas is escaping at a
15 high rate requires a detailed transient model to
16 define the operational parameters."

17 And I apologize, I was reading that before
18 you got to the page.

19 But do you see where I'm talking, it's
20 highlighted?

21 A Uh-huh.

22 Q And you flagged it and said "Let's talk
23 about this."

24 Do you know why you wanted to talk about it?

25 A I don't really remember. Something

1 triggered that thought. Possibly I might have wanted
2 to talk about the bottom hole pressure.

3 Q What about bottom hole pressure?

4 A Just that that seemed to be -- let me back
5 up.

6 Using the lower-than-actual bottom hole
7 pressure might have been a problem for the kill
8 operations. They couldn't wait -- or were not
9 waiting there, the fluid they're pumping down the
10 well to a heavy enough weight to overcome the
11 reservoir pressure.

12 Q Again, Ms. Felts, you don't have any
13 experience with well-control operations, correct?

14 A Well, not directly, but as an engineer I
15 studied it, and it's not a -- it's not a fine
16 science. It's just an engineering calculation.

17 Q An engineer with a suspended license,
18 correct?

19 A I don't have a suspended license. Why do
20 you say that?

21 Q I thought you indicated at the beginning of
22 our deposition that your license was on hold.

23 A No, I have a general -- I have a general
24 contracting license that's on hold, just has nothing
25 to do with this.

1 Q So your engineering license is active?
2 A I don't have an engineering license --
3 Q Do you have any certification --
4 A -- in California.
5 Q In other jurisdictions?
6 A No.
7 Q But you have a general contractors license?
8 A Yes, that was --
9 Q And that's what has been put on hold?
10 A Well, I put it on hold. You can --
11 If you don't want to pay \$500 a year for
12 your general contracting license, you can pay \$200 a
13 year and then reactivate it when you have a contract;
14 so that's what I did. It's still valid.
15 Q And is that related to work that you do on
16 any energy facility context?
17 A Well, it's a general contracting license,
18 and I used it for years doing drilling, monitoring
19 wells and cleaning up hazardous waste sites. It has
20 a HAZ rating with it.
21 Q Okay. Direct you to page 33. See the
22 section --
23 I'm sorry, I'll let you get there.
24 A Okay.
25 Q Second full paragraph, second half, "It is

1 probable that continued pumping from the surface
2 might have kept up with the fluid loss, but surface
3 plumbing failures prevented the well from being kept
4 filled."

5 Why did you delete that sentence?

6 A I think I deleted it because I didn't think
7 it was necessary for the testimony.

8 Q Same question for the next sentence, "The
9 use of fresh water and clear brine contributed to the
10 attempt's failure because of fluid loss into the
11 formation and loss of hydrostatic pressure, which
12 allowed the well to flow after the kill attempt."

13 A Same point.

14 Q Refer you to page 46 and 47. There is a
15 discussion here related to the chemical nature of
16 groundwater.

17 A Yes.

18 Q And the sentence starts "Factors that
19 control the chemical nature of the groundwater are
20 mineralogy, transmissibility, and topography."

21 Why did you delete this paragraph?

22 A Here again, I thought this was too much
23 detail and not contributing to the testimony.

24 Q Did you disagree with the substance?

25 A No.

1 Q Factual accuracy?

2 A No. I just thought it was drawing way too
3 much detail into the testimony.

4 MR. STODDARD: I'm going to introduce
5 Exhibit 1-25.

6 (Deposition Exhibit 1-25 was
7 marked for identification and is
8 attached hereto.)

9 BY MR. STODDARD:

10 Q Do you recognize this email, Ms. Felts?

11 A Looks like it's an email from Darryl to me.
12 I don't remember it.

13 Q It's the day before your testimony was
14 served; is that correct?

15 A Yes.

16 Q And the email reads "Margaret, I'll call you
17 about this shortly. Darryl." And it has an
18 attachment titled "Recommended Fixes."

19 A Okay.

20 MR. STODDARD: I'm going to mark Exhibit 1-26.

21 (Deposition Exhibit 1-26 was
22 marked for identification and is
23 attached hereto.)

24 BY MR. STODDARD:

25 Q Do you recognize this document, Ms. Felts?

1 A Not really.

2 Q This was the attachment to Exhibit 1-25,
3 which was Darryl's email to you with the attachment
4 "Recommended Fixes," and Darryl said he was going to
5 call you about it.

6 Do you recall Darryl calling you about it?

7 A No, but ask questions if you want.

8 Q Okay. Do you know if this document was
9 incorporated into your testimony?

10 A I don't recognize it. Do you know where it
11 is in the testimony?

12 Q I'll refer you to Exhibit 1-7.

13 A I have that here.

14 Q Turn to page 77. 76.

15 A Okay.

16 Q Does this refresh your recollection?

17 A Okay. I see where it is. I understand what
18 it is. Okay.

19 Q Okay. I take it you didn't write this
20 section, correct?

21 A No.

22 Q And it doesn't sound like you reviewed this
23 section either, correct?

24 A I'm sure I read it because I read the whole
25 testimony before it went out.

1 Q But you don't recall discussing it with
2 Mr. Gruen?

3 A Well, we probably discussed it because we
4 went over all of this before it went out. But looks
5 a little --

6 Let me see.

7 A Okay. We probably just walked through it
8 toward the end.

9 Q Okay. So you don't recall feeling
10 uncomfortable about the fact that Mr. Gruen sent you
11 a new section of your testimony that you were
12 agreeing to sponsor the day before you were due to
13 serve it?

14 A Well, I think this was something that was
15 probably already being discussed, and it just got
16 finalized here.

17 Q Discussed with you?

18 A Yeah.

19 Q But you don't recall?

20 A Well, I don't recall this format of it. I
21 guess this is how it looked when it was printed out
22 from the email. This looks more familiar, what is in
23 the testimony. It's just a formatting thing I see.

24 Q Looking at the one in the final testimony --

25 A Okay.

1 Q -- starting at page 26.
2 A Okay.
3 Q Do you recall --
4 A 76 or 26?
5 Q I'm sorry, 76. Thank you.
6 A Okay. Okay.
7 Q Do you recall discussing "Solution 1,
8 Production casing should be cemented to the
9 surface" --
10 A Yes.
11 Q -- with Mr. Gruen?
12 A Yes. This is --
13 That was a common finding, yes.
14 Q And do you recall doing any research or
15 investigation on this recommendation?
16 A Well, I'm sure it came right out of the
17 Blade report.
18 Q So for purposes of this, you are relying on
19 the Blade report and you're satisfied with their
20 findings on this issue?
21 A For purposes of almost the whole report, I
22 was relying on Blade, and I felt pretty comfortable
23 with it. We just went over the areas that I wasn't
24 comfortable with.
25 MR. STODDARD: Okay. Thank you.

1 I'm going to introduce Exhibit 1-27.

2 (Deposition Exhibit 1-27 was
3 marked for identification and is
4 attached hereto.)

5 BY MR. STODDARD:

6 Q Do you recognize this document, Ms. Felts?

7 A Yes.

8 Q And this is an email from Darryl to you --

9 A Yes.

10 Q -- marked "Attorney-client privilege,"
11 attaching a revised or a -- I'm sorry, with an
12 attachment titled "Felts.2019 Draft Testimony
13 112119," correct?

14 A Yes.

15 MR. STODDARD: Introduce Exhibit 1-28.

16 (Deposition Exhibit 1-28 was
17 marked for identification and is
18 attached hereto.)

19 BY MR. STODDARD:

20 Q Do you recognize this document, Ms. Felts?

21 A This looks like the recordkeeping section.

22 Q Is this Darryl's revisions to the initial
23 draft recordkeeping section that you sent him?

24 MR. GRUEN: Objection. Calls for speculation,
25 assumes facts not in evidence.

1 BY MR. STODDARD:

2 Q Is this a revised version of the draft that
3 you initially sent to Darryl?

4 A It looks like there is a couple of comments
5 on it, all for me to confirm footnotes.

6 Q Do you see the comment on page -- the pages
7 are not numbered, the second-to-last page of the
8 document?

9 A Yes.

10 Q Is that a comment from Darryl?

11 A In the red -- little red box?

12 Q Yes.

13 A Yes.

14 It says "Margaret to confirm accuracy of
15 footnote."

16 Is that the one you're looking at?

17 Q Yes.

18 And you believe that's a comment from
19 Darryl?

20 A I think so. It says "GD1." That's his
21 initials and number 1.

22 Q Referring back to Exhibit 1-16 --

23 A 1-16.

24 Q -- for comparison purposes --

25 A 1-16. I don't seem to have it. There

1 should be one in this stack.

2 THE VIDEOGRAPHER: Counsel, while she is
3 looking, may I have a moment to change my disks?

4 MR. STODDARD: Yes.

5 THE WITNESS: I got it.

6 THE VIDEOGRAPHER: This is the end of disk
7 number three, Volume Number 1, in the deposition of
8 Margaret Felts on February 5th of the year 2020.

9 We are off the record at 3:39 p.m.

10 (Off the record.)

11 THE VIDEOGRAPHER: This is the beginning of disk
12 number four, Volume number 1, of the deposition of
13 Margaret Felts on February 5th of the year 2020.

14 We are on the record at 3:44 p.m.

15 MR. STODDARD: Thank you.

16 Q Referring back to where we were, we were
17 comparing documents 1-16 with 1-28.

18 And for sake of context, 1-28 is a later
19 version of the same document as 1-16, except that
20 1-28 was sent from Mr. Gruen to Ms. Felts the day
21 before her testimony was filed -- the day before her
22 testimony was served.

23 I'm going to direct you to page 2 of both
24 documents at the bottom.

25 A Okay.

1 Q Do you see the sentence starting "The
2 significance"?

3 A Yes.

4 Q "The significance of these files" --
5 In the older document it states "The
6 significance of these files is that they contain
7 records not included in the SS-25 Well File but
8 relevant to the operation, maintenance and closure of
9 Well SS-25 because these wells share similar design,"
10 and it goes on.

11 In the more recent version that Darryl sent
12 to you on the 21st, it states "The significance of
13 these files is they contain record types such as
14 Interoffice Memos, handwritten field notes, analyses,
15 and reports that are not included."

16 That's a change relative to your original
17 draft; would you agree?

18 A Yes.

19 Q Did you make that change or did Darryl make
20 that change?

21 A I think I made --

22 MR. GRUEN: Objection. Calls for speculation as
23 to the actions of Darryl Gruen.

24 BY MR. STODDARD:

25 Q Did you make that change?

1 A I made the change orally to Darryl.

2 Q So you had a phone call to discuss the prior
3 draft?

4 A Yes.

5 Q Do you believe that all changes in this
6 document were made by you pursuant to that phone
7 call?

8 A Well, there is one on the front page that I
9 know was, and that was where we deleted a paragraph I
10 wrote about 451 and slightly modified the first
11 paragraph, I think, so --

12 And in this one I know, because Darryl
13 wouldn't know about interoffice memos, handwritten
14 field notes and analyses and reports. I had to have
15 said that.

16 Q Why wouldn't Darryl know about that?

17 A Because he hasn't read that well file, I
18 don't think.

19 Q And how about looking at the footnotes on
20 page 2?

21 A Footnotes on page 2?

22 Q Yeah.

23 MR. GRUEN: Of which exhibit?

24 MR. STODDARD: I'm sorry, of Exhibit 1-28.

25 THE WITNESS: Okay.

1 BY MR. STODDARD:

2 Q They did not appear in Exhibit 1-16,
3 correct?

4 A Okay. That's true, but I would have -- I
5 would have told him what the footnotes had to be. He
6 wouldn't have known.

7 Q Okay. And do you believe that's likely the
8 case?

9 Do you recall the conversation you had with
10 Darryl about these changes?

11 A Yeah.

12 Q Do you think all of the changes were
13 probably made pursuant to --

14 A Yes.

15 Q -- your discussion?

16 A Uh-huh.

17 Q I'm going to direct you to the first page of
18 Exhibit 1-28.

19 A Yes.

20 Q The second footnote related to Public
21 Resources Code Sections 3106, 3180, 3181, 3220 and
22 3403.5.

23 Did Darryl also make that change at your
24 direction?

25 A No. I would guess he probably actually put

1 the code sections in there because that's related to,
2 see footnote 2, so we probably looked at it while we
3 were on the phone, and he probably put it in.

4 Q But you're not sure?

5 A I'd have to look up the code and tell you
6 for sure. But if it's -- if it's DOGGR codes, then I
7 put it in. If it's PUC codes, he put it in.

8 Q Okay. So it might be helpful for purposes
9 of the record actually then to introduce them so you
10 can confirm based on the subject matter.

11 A Okay. That would be helpful.

12 MR. STODDARD: We'll mark this as Exhibit 1-29.

13 (Deposition Exhibit 1-29 was
14 marked for identification and is
15 attached hereto.)

16 MR. STODDARD: I apologize the first page is
17 Section 3008, which you don't cite to; its just
18 definitional. It's just definitional the first page,
19 that's 3008.

20 THE WITNESS: Right.

21 BY MR. STODDARD:

22 Q That is not something that you cite. But if
23 you turn to page 2, it's Section 3106, take a moment
24 to review it.

25 MR. GRUEN: I'm sorry, just for the record, it

1 appears as if there are multiple page 2's in the
2 document; so just to --

3 Could we clarify which page 2 is being
4 referred to for the record?

5 MR. STODDARD: Yeah.

6 So to clarify what has been marked as
7 Exhibit 1-29 is California Public Resources Code
8 Sections 3008, 3106, 3180, 3181, 3315 and 3320,
9 3316.2 and 3403.5, and I -- they are stapled
10 together.

11 And I was directing the witness to the
12 second page of the packet, which is Section 3106.

13 MR. GRUEN: Understood. Thank you.

14 THE WITNESS: Okay.

15 BY MR. STODDARD:

16 Q So you've reviewed the document.

17 Having done so, did you add these citations?

18 A I would have added them.

19 MR. STODDARD: Okay. Thank you.

20 We can take a break if it's okay with you.

21 MR. GRUEN: Okay.

22 THE VIDEOGRAPHER: We are off the record at
23 3:52 p.m.

24 (Off the record.)

25 THE VIDEOGRAPHER: We are back on the record at

1 4:25 p.m.

2 BY MR. STODDARD:

3 Q Ms. Felts, I'm going to reference with the
4 next questions Exhibit 1-7 --

5 A I got it.

6 Q -- which is your opening testimony that was
7 served.

8 A Okay.

9 Q Turning to pages 3 through 6 of this
10 document.

11 A 3 through 6?

12 Okay.

13 Q Do you see violations starting at number 95
14 and going through 320?

15 These are violations that relate to
16 SoCalGas's assertions of attorney-client or attorney
17 work product privilege; is that correct?

18 A Lack of cooperation, is that what we're
19 talking about? Am I looking at the wrong thing?

20 Q Yes, 95 to 320, "Lack of Cooperation."

21 A 320, yes.

22 Q And for each of these --

23 If you want to take a moment to review, you
24 can, but for each of these, it relates to SoCalGas's
25 privilege claims?

1 A Okay.

2 Q And that's the majority of the violations
3 that are asserted in your testimony, do you agree?

4 A Numerically, yes.

5 Is that what you're talking about, "the
6 majority"?

7 Q Yeah, the majority.

8 A Yeah, okay.

9 Q Yeah. All right. Now, turning to
10 Section 2, C.2 that is referenced in association with
11 these violations.

12 A And page?

13 Q I'll have that for you in a second. 52.

14 A 2, I see 2 on page 52.

15 Q Yeah.

16 And earlier you stated that you did not
17 draft this section, correct?

18 A Yes.

19 Q And that is everything related to the
20 privilege issues, correct?

21 A Yes.

22 Q But you are sponsoring this portion of
23 testimony, correct?

24 A Yes, I agreed to sponsor the entire
25 testimony.

1 Q How did you get comfortable to sponsor this
2 section?

3 A Well, I guess I went over these particular
4 violations with -- with Darryl and discussed them
5 with him.

6 Q When did you do that?

7 A It would have been prior to the testimony
8 going out.

9 Q And you feel that you have a good
10 understanding of the underlying facts related to this
11 issue?

12 A Well, I think I have a pretty good
13 understanding of what was happening.

14 Q Did you review any underlying documents
15 associated with these violations?

16 A I reviewed the documents that were attached,
17 the exhibits.

18 Q Do you recall any specifically?

19 A Not without looking at them. I should
20 remember them. I think I just looked at them
21 yesterday.

22 Q But earlier it does not include the
23 privilege log associated with SED 16, correct?

24 A There was a point in time when I looked at
25 the privilege log. I just can't really answer any

1 questions about it unless you show it to me.

2 Q Do you recall reviewing any of the documents
3 that SoCalGas withdrew its privilege claims -- for
4 which -- let me restate that.

5 Do you recall reviewing any of the documents
6 that are the basis for the alleged violations?

7 A These are the documents.

8 Q Related to the privilege issues?

9 A The documents that you eventually
10 produced --

11 Q Correct.

12 A -- I'm pretty sure I saw them. I don't --
13 It seems like I remember emails, but I'm
14 not --

15 I mean, I can't tell you the content of them
16 just as I sit here today.

17 Q Do you recall reviewing any correspondence
18 or letters between SoCalGas and SED related to
19 meet-and-confer meetings --

20 A No.

21 Q -- on the privilege issue?

22 A Not specifically.

23 Q Do you recall reviewing any data responses
24 related to the privilege issues from SoCalGas?

25 A I think I probably did. If you want to ask

1 specific questions, you're probably going to have to
2 show me the documents.

3 Q And do you feel as though you understand
4 SoCalGas's position with respect to its initial
5 privilege assertions relative to the privilege --
6 relative to the documents that are at issue in the
7 privilege log?

8 MR. GRUEN: Jack, if I may, I think there is
9 a --

10 I'm going to object to the question as vague
11 in that if there is a particular area in the
12 testimony that you want to direct -- or documents,
13 the witness has called for documents that you can use
14 to ask questions.

15 But the vagueness in this question is the
16 actual position.

17 Without identifying the piece of testimony
18 or the document where it's stated, it's going to be
19 hard for the witness to answer a question like that.

20 MR. STODDARD: Understood.

21 I'm trying to understand the witness's
22 process with respect to sponsoring this testimony; so
23 I'll restate the question.

24 Q Just as a matter of fact, did you consider
25 SoCalGas's position with respect to the privilege

1 issue in evaluating the testimony that you were
2 provided by Mr. Gruen?

3 A Are you asking me if I understood why
4 SoCalGas was claiming privilege?

5 Q Yes.

6 A I think I -- I think I understood what
7 SoCalGas said was their purpose in claiming
8 privilege. That's probably not the same as saying
9 that I understood it. I --

10 MR. STODDARD: Offer this as exhibit.

11 (Deposition Exhibit 1-30 was
12 marked for identification and is
13 attached hereto.)

14 MR. STODDARD: Take a moment to review that
15 document.

16 MR. GRUEN: Just, Jack, just for clarification,
17 you want her to review the entirety of this document?

18 MR. STODDARD: No. I want her to review it to
19 the extent she is --

20 If you need additional time, just ask for
21 it. If I ask a question, we can see --

22 THE WITNESS: Why don't you ask a question and
23 see how far we can go with it?

24 BY MR. STODDARD:

25 Q Okay. Do you recognize this document?

1 A I've seen it.

2 Q Did you review it in connection with
3 preparation of your testimony?

4 A No, I did not have it until after then.

5 Q Okay. Thank you.

6 Ms. Felts, I'm going to direct you to
7 page 62 of Exhibit 1-7.

8 A Okay.

9 Q Middle of the page, do you see where it
10 starts "By SED's count, approximately 18 additional
11 documents were released"?

12 A Yes.

13 Q And then it says "Each of the 95 pages that
14 SoCalGas did not release on the grounds of
15 attorney-client or attorney work product privilege is
16 a Section 451 violation because it delayed SED's
17 ability to get this information as part of its
18 pre-formal investigation."

19 Do you see that?

20 A Yes.

21 Q Are you aware of any specific information in
22 the 95 pages that you believe was important to SED's
23 investigation?

24 MR. GRUEN: Objection. Mischaracterizes the use
25 of the term "investigation" as -- in the past tense

1 mischaracterizes it.

2 The investigation is ongoing.

3 THE WITNESS: The way I could answer that is
4 that apparently this, in part, relates to the DR 16
5 response. And if portions of the DR 16 response were
6 not available, it would be difficult to nail down
7 some of these violations. But since I don't know
8 which pages specifically out of that response were
9 withheld, I can't answer.

10 BY MR. STODDARD:

11 Q Well, I'm asking, Ms. Felts, what this
12 information in your testimony is referencing because
13 there is no citation, so I'm not sure.

14 But it says "Each of the 95 pages that
15 SoCalGas did not release on the grounds of
16 attorney-client or attorney work product privilege is
17 a Section 451 violation because it delayed SED's
18 ability to get this information as part of its
19 pre-formal investigation," and I'm asking what that
20 information was in your view?

21 A I think this information refers to the
22 95 pages that SoCalGas did not release.

23 Q Do the contents of those 95 pages matter in
24 your view as to whether or not it's a Section 451
25 violation?

1 A I don't think it's the contents that is the
2 issue here. I think it's the release of the
3 documents that were requested. So it goes to the
4 investigation overall.

5 If you don't know what is in the records,
6 you have to assume that it's possibly not safe -- a
7 condition or relevant to a condition that is not
8 safe; so it prohibits the complete investigation by
9 not being able to look at the records.

10 Q That's not what this sentence says though.

11 It says that SoCalGas did not -- that "Each
12 of the 95 pages that SoCalGas did not release on the
13 grounds of attorney-client or work product privilege
14 is a violation because it delayed SED's ability to
15 get this information as part of its pre-formal
16 investigation" seems to be suggesting that there was
17 information in there which was material to the
18 investigation that SED was prevented from getting.

19 Would you agree?

20 A And I think that's the assumption that they
21 made when they didn't get it.

22 So it's made prior to receiving the
23 95 pages. You can't make a judgment on the content
24 of something that you haven't received yet; so it's
25 the delay that is the problem.

1 Q Are you --

2 Is it the case, then, that you believe that
3 SED did not receive these pages at the time that
4 these violations were asserted?

5 A I'm actually not sure when the pages were
6 turned over.

7 Q Okay. Above that, do you see the
8 sentence that says "By SED's count, approximately
9 18 additional documents were released"?

10 A Yes.

11 Q And there are violations both for those
12 18 documents and the 95 pages; is that correct?

13 A I think that's correct.

14 Q Can you explain why in one instance the
15 violations are linked to documents and in the other
16 it's pages?

17 A That's --

18 I don't know. That was a choice of wording,
19 I suppose. Maybe somebody counted up the pages in
20 the 95 number.

21 Without having the 18 documents in front of
22 me, I can't tell you whether that's 18 individual
23 documents, therefore 18 pages, or 18 multiple-page
24 documents.

25 Q In general, discovery requests are for

1 documents, not for pages, would you agree?

2 A Yes.

3 Q Do you think it would be more reasonable to
4 assert violations based on documents that were
5 withheld versus documents that happen to have
6 multiple pages that were withheld?

7 A I don't really have any history on that as
8 far as the way violations are counted.

9 Q But you are sponsoring this testimony,
10 correct?

11 A Yes.

12 Q So why in your view should violations be
13 calculated on the basis of individual pages for
14 multipage documents?

15 MR. GRUEN: I'm going to object.

16 This line is calling for legal conclusion as
17 to how violations are counted. This is a legal
18 question that is appropriate for briefing, not
19 questioning of the witness.

20 She can answer if she wants to, but this
21 is -- in SED's view this is a waste of time.

22 THE WITNESS: Without looking at both sets, the
23 18 and the 95, I don't know why it was chosen to call
24 one documents and one pages, but I would expect that
25 the 95 pages is probably 95 documents; so other than

1 that, I think -- I think it should be consistent.
2 It's probably my fault for not checking it.

3 MR. STODDARD: Thank you.

4 Q In the set that you did review, do you
5 recall noticing any duplicate documents? Again, this
6 is related to the --

7 A Privilege.

8 Q -- the privilege, the 95 or the 18.

9 A I don't recall offhand, but duplicates are
10 very common in SoCalGas responses. Certainly in
11 DR 16 there were duplicates upon duplicates of
12 emails.

13 Q And if there were duplicates of documents in
14 this data set, would that change your assessment as
15 to whether or not it should be a violation?

16 A If the duplicates should be a violation?

17 Q If the withholding of the duplicate for
18 basis of privilege should have been a violation of
19 451 and Rule 1.1?

20 A Well, I think you're making the assumption,
21 again, that the -- I could assess the delay of
22 producing things I don't know what they are, you
23 know, ahead of time because I wouldn't have known
24 that there were duplicates in that set.

25 All I know from a privilege log is that

1 you're claiming privilege for X number of documents,
2 and you probably had a page count on them in the log,
3 but --

4 So you claim the privilege -- or SoCalGas
5 did then. That took a certain amount of time to get
6 the documents, and that's the delay, and that's the
7 basis of the assessed penalty.

8 Q Okay. Turning back to the beginning of
9 Exhibit 1-7 --

10 Actually, set that aside for a second. I'm
11 going to ask some other questions without referencing
12 a document.

13 Ms. Felts, what experience do you have
14 with -- what prior experience do you have with root
15 cause analysis investigations?

16 A I've only reviewed root cause analysis.
17 Mostly related to pipeline cases.

18 Q How many root cause analyses have you
19 reviewed?

20 A I don't have an exact count, but I'd say
21 probably at least over 50.

22 Q And you said mostly related to pipeline
23 cases; is that correct?

24 A Yes.

25 Q Do you recall any that were related to gas

1 storage fields?

2 A No.

3 Q Are you familiar with the phrase "technical
4 root cause analysis" as opposed to root cause
5 analysis?

6 A I wouldn't know the difference if there
7 is -- if there is a difference.

8 Q So no?

9 A Not in the field as it would apply to this
10 type of incident.

11 Q And you say you've reviewed over 50 root
12 cause analyses; is that correct?

13 A Yes.

14 Q Have you ever prepared a root cause
15 analysis?

16 A No.

17 Q Or been on a team that was preparing a root
18 cause analysis?

19 A No.

20 Q Have you overseen preparation of a root
21 cause analysis?

22 A It's possible that at the refinery and at
23 Celanese I was involved in overseeing root cause
24 analysis on some incidents.

25 Q Prior to this matter, what was the most

1 recent root cause analysis that you can recall
2 reviewing or being involved in?

3 A In the San Bruno case I reviewed all of the
4 historical analyses that were provided, and there was
5 a whole archive of them at PG&E.

6 Q Was that root cause analysis prepared by the
7 NTSB; is that correct?

8 A No. These would have been either in-house
9 by PG&E or by external third-party contractors
10 and -- for PG&E.

11 Q And in your experience how do those prior
12 root cause analyses compare to the Blade report in
13 terms of volume and length?

14 A It was quite a variation depending on the
15 incident and probably the significance of the outcome
16 of the incident. But I would say overall the Blade
17 analysis was far more extensive and detailed, but the
18 engineering or technical analysis of the pipe itself
19 is very similar.

20 Q So the metallurgical piece?

21 A Yes.

22 Q And in reviews of other root cause analyses
23 that you've done, have you looked only at the report,
24 or do you also look at underlying data, information,
25 that was collected by the investigator in the course

1 of preparing a root cause analysis?

2 A I've generally had access to all of the data
3 and underlying records, assuming they're available.
4 Sometimes if you're going really back in history, all
5 you get is the report. But most of a metallurgical
6 analysis would have lab reports attached to them and
7 photographs and basic information that the report
8 relied on.

9 Q And in this instance have you been offered
10 access to review that information for the Blade
11 report?

12 A I would say that a lot of it is in the
13 supplemental technical reports that were provided in
14 the additional volumes.

15 Q But beyond the supplemental reports, the
16 actual data they collected or, you know, images that
17 they didn't include in the report ---

18 A I haven't reviewed anything outside of what
19 they provided.

20 Q What is your understanding of the purpose of
21 a root cause analysis investigation?

22 A Generally?

23 Q Generally.

24 A To determine what the cause of an incident
25 was or a failure, pipeline failure, a well failure.

1 Sometimes it's an operational issue that caused a
2 problem; so it's generally to determine what the
3 cause is of an incident.

4 Q So that you can prevent similar incidents
5 from occurring in the future; would you agree?

6 A Well, that's a good start. If you can
7 figure out what caused it, then you can figure out
8 how to prevent it in the future.

9 Q But would you agree that that's one of the
10 purposes of a root cause analysis is to identify the
11 causes in order to prevent similar -- in order to
12 prevent reoccurrence of similar events?

13 A It's one.

14 Q And would you agree that a root cause
15 analysis investigator should include all potential
16 causes?

17 A Well, I mean, if they did a really good root
18 cause analysis, they should be able to determine what
19 the cause was, not a range of causes.

20 Q In conducting their investigation though,
21 when they're considering potential causes for
22 purposes of scoping their investigation, would you
23 agree that they should include all potential causes,
24 or do you think they should circumscribe it?

25 A I would think a good engineering review

1 would include a range of possibilities at the front
2 end, and then you would start eliminating them pretty
3 fast because you would want to focus in on where the
4 data is leading.

5 Q And that the root cause analysis
6 investigator should follow the data toward what they
7 identify as a root cause?

8 A I think so.

9 Q Regardless of whether or not that root cause
10 relates to something that is required by law?

11 A I don't think required by law has much to do
12 with a root cause analysis.

13 Q Regulation?

14 A Same thing. I mean, whether it's required
15 or -- a required activity or not, the cause is still
16 going to be technical, unless you're looking at an
17 operational issue, if somebody did or did not do what
18 they were required to do and caused an accident, say.

19 Root cause analysis could be performed on a
20 lot of different kinds of incidents, like car
21 accidents, you know, and purposes can range too. A
22 lot of them are called for by insurance companies.
23 They just want to know where to assign liability.
24 They don't care whether it gets fixed.

25 Q Referring back to Exhibit 1-7 --

1 A Okay.

2 Q -- direct you to pages 7, 7 to 9.

3 MR. GRUEN: I'm sorry, 7 and 9?

4 MR. STODDARD: 7 through 9.

5 MR. GRUEN: 7 through 9.

6 BY MR. STODDARD:

7 Q Starting with page 7. This identifies "A
8 root cause for the SS-25 incident was the lack of
9 detailed follow-up investigation, failure analyses,
10 or RCA of casing leaks, parted casings, or other
11 failure events in the field in the past."

12 Do you see that?

13 A Yes.

14 Q "There have been over 60 casing leaks at
15 Aliso Canyon before the SS-25 incident, but no
16 failure investigations were ever conducted."

17 A Yes.

18 Q Do you contend that a root cause analysis
19 should have been performed for all 60 casing leaks?

20 A Well, I would say that it would not be
21 possible to do a root cause analysis in the manner
22 that Blade did because you would have to take the
23 well out of service and pull all of the casing; so
24 that wouldn't be practical.

25 On the other hand, I think there were things

1 that SoCalGas could have done to determine the cause
2 of failures, not just that a failure occurred, which
3 seems to be what was typically happening. They could
4 have determined causes using available technologies,
5 and they didn't --

6 As near as I know, as I can tell they did
7 not, at least not until I saw some study in 2014 on I
8 think it's Well FREW2 that actually went to
9 determining the cause of the corrosion, but -- and
10 maybe that one actually wouldn't be considered a root
11 cause analysis. But certainly it was closer.

12 In most of the well files that I have looked
13 at, I don't see any evidence of an effort to
14 determine cause.

15 Q You mentioned tools that can be used while
16 the well remains in service to determine cause?

17 A Yes.

18 Q Can you identify some of those tools?

19 A Oh, I think we did that in a data response.
20 But there are tools that can be run into a well while
21 it's killed temporarily in order to measure the
22 thickness of the well casing or a tubing thickness.
23 There are other kinds of logs that can be run that
24 would give you a sense of erosion or conditions of
25 the wells.

1 So I think you have to pick the right log
2 technique and contractor and collect the data and see
3 what you can find out about the well.

4 Q So had SoCalGas, after identifying a
5 failure, run casing inspection logs, in your view
6 that would have been sufficient for purposes of
7 identifying cause in a failure investigation?

8 A No. I think once they had determined, say,
9 that there was -- there were a number of failures,
10 say, in the same area -- either depth of wells or
11 across a geologic formation, like sand with water in
12 it has corrosion in a number of wells exposed to that
13 sand, maybe the casings are all, you know, not
14 cemented. If there are similarities across the
15 wells, then I think they should maybe take one of
16 those wells out of service and do a more extensive
17 study.

18 Q But the question related to a specific well
19 failure in terms of what an investigation would be
20 for a specific failure, so taking one in isolation.

21 MR. GRUEN: I note an objection for the record.

22 It is not Safety and Enforcement Division's
23 role to identify the kinds of investigations that
24 Southern California Gas Company should be doing on
25 its own field. That is the role of the operator and

1 it's -- the --

2 This goes beyond -- generally speaking, this
3 goes beyond the scope of the testimony to ask
4 questions prompting your witness, Ms. Felts, to
5 identify how SoCalGas should be investigating its
6 field.

7 So she can answer the question, but we're
8 noting the objection for the record and -- on this
9 question and others to which SoCalGas asks how it
10 should be investigating its fields, including leaks
11 in this one.

12 MR. STODDARD: Noted.

13 Q So to repeat my question, for purposes of a
14 specific casing leak --

15 So earlier you talked about kind of a more
16 regional type of potential investigation. I'm
17 focusing in on what would have been adequate
18 investigation for a particular casing leak.

19 After a leak is identified or there is a
20 condition or a failure, had SoCalGas run a casing
21 inspection log after killing the well, would that
22 have been sufficient for purposes of identifying the
23 cause?

24 A Probably not. There is probably going to
25 have to be some additional information, but I can't

1 tell you exactly what it would be. And I would guess
2 that if it were my well, and I wanted to find out the
3 cause, I would probably call Halliburton or one of
4 their competitors and say "What is your latest
5 technology? How can we figure out what the cause of
6 this failure is?" And they would be happy to charge
7 me a lot of money and come tell me how to do that.

8 Q But you wouldn't kill the well, cut the
9 casing and do a full-blown RCA?

10 A Well, it depends. Because I think actually
11 SoCalGas did kill wells and look at casing in some
12 instances. I'm not sure that they generated any
13 reports that said what caused the failure in the
14 well.

15 But if you have a low-producing well, it's
16 not useful in the management of the field anymore and
17 it's in a location -- it failed and it's in a
18 location where it would provide useful information,
19 there might be a good reason to take it out of
20 service completely and remove some casing to find out
21 what caused the problem. Because it could provide
22 vital information for the rest of your wells that are
23 operating well right now but might not be later.

24 It's an engineering decision that would have
25 to be made by SoCalGas's reservoir engineers.

1 Q But to restate the point that you made
2 earlier, an RCA for each and every failure would not
3 be practical, correct?

4 A An RCA, to the extent that Blade did this
5 one for SS-25, is not practical. It's not field
6 practical for an operating field.

7 Q Okay. Direct you to page 3, 4, 5 and 6.
8 This is the "Table 1: Summary of Violations," and
9 this is in Exhibit 1-7.

10 A Okay.

11 Q Do you see the columns in this table titled
12 "Begin Date" and "End Date"?

13 A Yes.

14 Q Did you validate the begin date and end date
15 for each of these categories of violation?

16 A No. I can tell you right off the bat that I
17 just resist doing the violation calculation; so I
18 usually say to the PUC "Unless you need my help
19 figuring out a start and end date, go ahead and fill
20 it in."

21 Q So then you don't ask factual questions to
22 assess the reasonableness of the start dates and end
23 dates?

24 A Well, I'll look at them. For instance, if I
25 saw that a date was completely wrong based on the

1 data that I had reviewed, then I would say something.

2 Q Based on the data that you've reviewed.

3 But you wouldn't ask for information to
4 support specifically the alleged begin date and end
5 date -- and take, for example, Violation Number 84?

6 A Okay, let's look at 84.

7 Q Page 4.

8 A Okay. Okay. And so this one they --

9 I know they started the date at the date of
10 the memo in 1988 that said, gee, we should look at
11 these wells and assess them for corrosion because of
12 exposure to groundwater; so that started it in 1988.
13 And the end date was the date that the Well SS-25
14 blew.

15 Q And for purposes of Violation Number 76 --

16 A 76.

17 This would be a date that was established by
18 someone at the PUC having to do with some finding
19 about inability to collect recovery; so I'm not
20 familiar with that, with that date. And the end
21 date, again, is the date that the well blew.

22 So I'm guessing that someone needed money
23 from the Commission to support a program and delayed
24 some action for that period of time.

25 Q So you're guessing.

1 But you don't know the particular facts to
2 support that begin date?

3 A I don't know the underlying purpose of
4 selecting 12-31-2009.

5 MR. GRUEN: I'm going to just ask for purposes
6 of this line to reference where in the testimony
7 we're talking to.

8 There is a testimony section that we're in
9 that this is just the table summarizing violations;
10 so if there is a specific line of questioning about
11 the actual testimony that this refers to, I ask that
12 the witness be directed to that portion of testimony.

13 MR. STODDARD: You didn't include page numbers
14 here; so the witness is free to reference whatever
15 she needs to reference in this document.

16 She said she reviewed it in advance of
17 today's deposition. This is --

18 THE WITNESS: It says II.B, II.C, if I can find
19 it.

20 MR. STODDARD: Yeah.

21 THE WITNESS: Looks like it's page 17.

22 Okay. So this is based on a James
23 Mansdorfer recommendation that they start a Storage
24 Integrity Management Program, but apparently it
25 didn't start -- maybe it didn't start at all, but was

1 recommended in 2009.

2 So the start date of the violation was 2009.
3 I'm assuming they picked the last day of the year to
4 start the violation.

5 BY MR. STODDARD:

6 Q And why is that your assumption?

7 A It would be the most conservative choice in
8 2009. Any other day within 2009 would result in a
9 higher penalty.

10 Q And you don't know Mr. Mansdorfer, correct,
11 you stated earlier?

12 A No.

13 Q And you haven't spoken to him, correct?

14 A No. I read his interview.

15 Q You read his EUO?

16 A Yes.

17 Q Did you review this --

18 Did you review the documents aside from --
19 This is his EUO transcript here that is
20 cited.

21 Did you speak with anyone else about
22 Mr. Mansdorfer's EUO transcript with respect to this
23 issue aside from Mr. Gruen?

24 A No. I believe he produced some documents,
25 or maybe SoCalGas produced some documents by him that

1 I reviewed.

2 Q That are related to this issue?

3 A Yes.

4 Q Turning back to page 3. Again, trying to
5 understand the factual basis for begin date and end
6 date.

7 Violation Number 3, which is referenced at
8 Testimony Section Number II.B.1.a.

9 A This is probably about page 16, I would
10 guess. Okay. Okay.

11 Q Did you find the relevant section?

12 A Yes.

13 THE VIDEOGRAPHER: You lost your microphone.

14 THE WITNESS: I lost it again?

15 Okay. Is that better?

16 Okay, number 3. This is --

17 It says "No investigation on one of four
18 parted well casings."

19 I had it, I lost it. Okay.

20 Okay. The violation extends from the Blade
21 report. This has to do with a well. The casing was
22 parted or found to be parted in 1969.

23 You see the page is number 7?

24 BY MR. STODDARD:

25 Q And the basis for that start date?

1 A That's the date of the first -- the earliest
2 well casing report of a failed well casing in the
3 SoCalGas well records as it was reported to Blade.

4 So Blade had a history of well casing
5 failures, and that was the earliest one that was
6 reported. And so that date was 1969, not 12-31-1969,
7 but, again, the conservative date would be the last
8 day of that year.

9 Q Would it be relevant to your testimony on
10 this violation if SoCalGas did not own or control the
11 field at that time?

12 A I considered that. And it's relevant, but
13 it's not -- not necessarily decisive because SoCalGas
14 was in the process of acquiring -- acquiring the
15 field before 1973, which I think was maybe the
16 operational date. They probably had an application
17 in to the PUC for money to renovate the field.

18 In order to estimate those costs, they would
19 have to have information about the wells and what
20 they would have to do to them; so I'm guessing -- and
21 I'm only guessing because I don't have records yet,
22 but I would say it's likely that SoCalGas was aware
23 of this problem with this well.

24 Q So the start date of the violation dates to
25 SoCalGas's knowledge of when the violation -- when

1 the failure occurred?

2 A That's how it was set out in this testimony.

3 Q If SoCalGas did not have control of the
4 field at that time, would you agree that SoCalGas
5 could not have completed a failure investigation on
6 that well at that time?

7 A I don't know how much control they had over
8 doing investigations into wells that they were about
9 to purchase. I don't have enough knowledge to answer
10 that one way or the other.

11 Q Assume for the sake of argument,
12 hypothetically speaking, that SoCalGas didn't have
13 control sufficient to conduct an investigation or
14 direct any other operational actions at the field
15 prior to acquisition, would that be relevant to your
16 testimony on this violation?

17 A I think it might --

18 Yes, it would be relevant. It would also be
19 relevant to know whether they requested any failure
20 analysis from the prior owner Tidewater.

21 Q Isn't it likely, Ms. Felts, that SoCalGas
22 didn't possess the well files as of 1969 if they
23 didn't own or control the field?

24 MR. GRUEN: Objection. Calls for speculation.

25 She can answer if she knows.

1 THE WITNESS: They were in the process of
2 acquiring this field for a number of years; so I
3 would guess, again, that some documents had to have
4 exchanged hands, or there was some viewing of
5 documents. I can't imagine SoCalGas bought all of
6 these wells with no knowledge.

7 BY MR. STODDARD:

8 Q But to confirm a begin date for this
9 violation is based on your assumption that SoCalGas
10 would have had some form of access to both records
11 and the ability to direct their predecessor in
12 interest to conduct an investigation prior to
13 acquisition?

14 A The begin date was originally just
15 established on the fact that the parted casing on
16 this well occurred in 1969; so you can argue it
17 however you want to argue it.

18 Q Well, you said you considered the point that
19 I'm asking --

20 A Yes.

21 Q -- which is SoCalGas's date of acquisition?

22 A And I explained that I think SoCalGas
23 probably had access to information about this well,
24 and may have been able to determine what the cause of
25 this parted casing was.

1 Q But you don't know, correct?

2 A That's correct. I don't know anything that
3 SoCalGas doesn't tell me.

4 Q And you're not aware of any records
5 indicating that that's the case, correct?

6 A The -- the date, I believe came from
7 Division of Oil and Gas records. But as far as a
8 failure analysis, there is none in the record that
9 I'm aware of.

10 Q My question was are you aware of any
11 documents or other evidence that SoCalGas had the
12 ability to perform a casing -- a failure
13 investigation at that well prior to acquisition of
14 the field?

15 A I don't currently have that information.

16 Q Okay. Thank you.

17 Referring back to pages 8 and 9 at the top
18 of page 8, do you see there where it says --

19 And actually you have to turn back, I'm
20 sorry, to the very end of page 7.

21 -- "Blade reviewed 124 gas storage wells and
22 identified 63 casing leaks, 29 tight spots, 4 parted
23 casings, and 3 other types of failures."

24 Do you see that?

25 A Yes.

1 Q And then your testimony discusses those.

2 And then in the bulleted section below it
3 asserts specific violations "for failure to
4 investigate the blowout from Frew-3 spanning from
5 December 31, 1984" to October 23, 2015, the date of
6 the incident.

7 And then a second violation for the failure
8 to investigate the blowout at FF-34A, four violations
9 spanning from 1969 to 1994 related to parted --
10 failure to investigate parted casings, and then
11 60 leaks -- or I'm sorry, 54 violations for failure
12 to investigate an additional 54 leaks.

13 Do you see that?

14 A Yes.

15 Q You indicated earlier that prior to service
16 of your testimony you reviewed well records related
17 to SS-25, SS-25A and SS-25B, correct?

18 A Yes.

19 Q And in the course of that review, you found
20 temperature logs based on which you disagreed with
21 Blade's conclusion regarding a lack of anomalies in
22 the temperature logs at SS-25; is that correct?

23 A Yes.

24 Q For these leaks that are listed here and for
25 the alleged failure to investigate for each, how many

1 of these well files did you review?

2 A At the time I was relying entirely on Blade
3 for the counts, and I -- I am not sure, but I believe
4 Blade was relying on Division of Oil and Gas records.

5 Q And that's also what your belief was for
6 purposes of the temperature log you disagreed with,
7 correct?

8 Or, rather, their conclusions regarding the
9 lack of anomalies in the temperature log, it was also
10 your belief that they were relying on DOGGR records
11 for that, correct?

12 A And did not have access to the well logs,
13 yes.

14 Q Yeah.

15 So were you satisfied that if they were
16 relying --

17 In your view or belief they were relying on
18 DOGGR records for purposes of this analysis, what
19 gave you confidence that this was accurate?

20 A Well, DOGGR records that they were reviewing
21 were actually well histories that are reported by
22 SoCalGas.

23 So if SoCalGas reported a leak, I'm guessing
24 there was a leak. I don't think there would be any
25 advantage for SoCalGas to report a leak on the well

1 history if there wasn't one.

2 So they were just counting up casing
3 failures and leaks, and they were looking for
4 cause -- a determination of the cause of those and
5 not finding that.

6 Now, I don't know what other access --
7 without looking at what SoCalGas's responses were to
8 Blade's data requests, I don't know what other
9 information they rely on to do that. But I hope to
10 find out. But I haven't seen it yet.

11 Q If they were relying on DOGGR records, given
12 your experience or your views on the lack of
13 information there related to the temperature log,
14 isn't it possible that they were still miscounting
15 the number of leaks here?

16 A I don't see any way they could be
17 miscounting the leaks. Could be undercounting them.

18 Q That's miscounting, correct?

19 A Yes, but it would be to the advantage of
20 SoCalGas if they undercounted.

21 Q Does the characterization of the type of
22 leak matter for purposes of violations related to
23 failure to investigate?

24 A A leak is a leak, so I would say no,
25 although --

1 You could have, for instance, five holes in
2 the same location, in a very small area in a pipe and
3 call it one leak, whereas I think within the
4 industry, a leak is just a failure of the casing.

5 So, you know, how you count the leak may
6 determine on how detailed you get in terms of how
7 many holes are in a piece of pipe.

8 Generally, I think SoCalGas would probably
9 report just a failure. If they had a failure and
10 they had to patch it, they wouldn't count the number
11 of holes that were under the patch. It would be one
12 leak.

13 Q What about leaks that aren't in the body of
14 the casing, is that relevant in your view?

15 A Leaks, for instance?

16 Q For instance, a shoe leak.

17 A Well, a shoe leak is important because you
18 lose gas through it.

19 So if you're in the business of storing gas
20 for your own business or for someone else, you don't
21 want to be losing it into a part of a reservoir where
22 you can't get it back.

23 Q And what about leaks, "Leaks" that are the
24 result of faulty -- something like a valve that may
25 not be operating properly, would that in your view be

1 a leak, a mechanical piece of the well?

2 A What are you talking about, a release of the
3 gas into the well or external to the well?

4 Q A leak that would show up on a temperature
5 log.

6 A I don't know how that would show up on a
7 temperature log.

8 Q All right. Let me ask it differently.

9 Are you aware of any instances where an
10 operator might deliberately put holes in a tubular or
11 casing?

12 A You would perforate a casing purposely, yes.
13 That would be so you can either inject or extract the
14 gas from that level of the reservoir.

15 Q Would it ever be done for purposes of
16 cementing?

17 A Yes.

18 Q And are those holes on occasion plugged with
19 cement?

20 A Sometimes.

21 Q And if one of those holes were to be leaking
22 gas, in your view, is that a leak that requires
23 investigation or simply repair?

24 A I would suppose if they understood exactly
25 what was going on that they would just patch it, and

1 there would be no purpose to investigate it because
2 the recurrence is not likely to occur unless, say,
3 something was dissolving the cement.

4 Q I'm going to direct you to page 13 of your
5 testimony.

6 A Okay.

7 Q You'll see here this relates to the heading
8 "SoCalGas Did Not Implement a Risk Assessment Program
9 Or Wellbore Integrity Management Plan on the Aliso
10 Canyon Storage Facility Prior to October 23, 2015,"
11 and if you turn to page 16, which is the end of this
12 section under this heading, it states "SoCalGas's
13 failure to implement any form of risk assessment
14 program or wellbore integrity management plan on the
15 Aliso Canyon storage facility prior to October 23,
16 2015, and beginning 2009 and continuing through the
17 date of the incident, constitutes a separate
18 violation of Section 451 for each day it failed to
19 implement the risk assessment program."

20 Do you see that?

21 A Yes.

22 Q And then I'm going to refer to the next two
23 sections, section b) also relates to SoCalGas's
24 failure to implement a risk assessment program or
25 wellbore integrity management plan prior to the date

1 of the leak.

2 Do you see that?

3 A Yes.

4 Q And resulted in the failure to detect
5 corrosion on the well at the 7-inch casing prior to
6 October 23, 2015.

7 Prior to October 23, 2015 would include
8 2009, would it not?

9 A Yes.

10 Q Aren't these two violations really the same
11 thing, which is SoCalGas's alleged failure to
12 implement a risk assessment program or wellbore
13 integrity management plan?

14 MR. GRUEN: Objection. Calls for legal
15 conclusion.

16 MR. STODDARD: All right. I'll ask it in a
17 different way.

18 Q The underlying conduct, which is a factual
19 question, that serves as the basis for these
20 violations is the same, is it not?

21 A Yes.

22 Q And that's also true for the next
23 Section c) "SoCalGas Did Not Start a Storage
24 Integrity Management Program in 2009, Even Though It
25 Was Recommended by Its Storage Engineer Manager At

1 That Time Because They Could Not Yet Collect It in
2 Rates," is that correct?

3 A The start date and underlying issue of
4 storage, no storage integrity management program is
5 the same.

6 Second half of it is different, and it has
7 to do with a decision they made -- SoCalGas
8 apparently made related to not being able to collect
9 and rate the money to start the program. Slightly
10 different in my mind.

11 Q But the underlying conduct related to the
12 violation is the failure to initiate an integrity
13 management program, correct?

14 A That's what it's linked to, yes.

15 Q Okay. Thank you.

16 And for all three of these sections on pages
17 13, Section a), 16 Section B), and 17 Section C) the
18 basis for the statutory violation legally is
19 Section 451, correct?

20 A Yes.

21 Q Ms. Felts, do you know which agencies are
22 involved with regulation of gas storage operations in
23 the state of California?

24 A Department of Oil and Gas would be the
25 primary agency. I would expect the Energy Commission

1 might have some interest as a secondary.

2 The Public Utilities Commission, because
3 they're operated by utilities, the Air Board probably
4 has an interest because of air emissions, and the
5 possibly local water boards because of potential
6 water discharge from separators and that sort of
7 thing on the surface. And probably also for
8 groundwater contamination.

9 Q And at the federal level, are you aware?

10 A I would think that California would probably
11 have most of the authority, although there might be
12 some authority under PHMSA for some of the pipelines
13 that are connected to the gas storage.

14 Q Are you aware of the memoranda of
15 understanding related to the Aliso Canyon
16 investigation between DOGGR and the CPUC?

17 A I have not seen it.

18 Q You have not seen it. Okay.

19 Which agency do you believe has primary
20 jurisdiction over down hole gas storage and gas
21 storage wells?

22 A Department of Oil and Gas.

23 Q I want to refer back to your testimony.
24 This again is Exhibit 1-7 page 18. Paragraph -- or
25 I'm sorry, header 3, "SoCalGas did not have a dual

1 mechanical barrier system in the wellbore of SS-25,
2 instead leaving the 7-inch production casing as the
3 primary barrier to the gas."

4 Do you see that?

5 A Yes.

6 Q Can you explain exactly what is meant by a
7 "dual mechanical barrier" here?

8 A The idea would be to have it designed so
9 that you have tubing going down the middle of it and
10 then an external casing finished through your top
11 casing so that your external casing is separate --
12 serves as a barrier. But in this case, because they
13 were producing and injecting through both the casing
14 and the tubing, then you lose the protection you
15 don't have in, like, a second wall outside of your
16 production casing.

17 So in this case Blade is saying that they
18 didn't have that extra protection; so when the 7-inch
19 casing failed, there was nothing outside of it to
20 contain the gas. It was a true failure.

21 Q Are you familiar with the usage of dual
22 mechanical barrier at other gas storage fields?

23 A I actually don't know what the -- I don't
24 know what technology is used in the wells in other
25 storage fields around the United States. I haven't

1 looked into that.

2 Q Okay.

3 A I'm assuming Blade knows.

4 Q I'm going to refer you now to page 19. And
5 there is an embedded quote. And this discusses
6 SSSVs.

7 Do you see that?

8 This -- I'm sorry, this is the embedded
9 quote at the bottom of page 19. "Also as noted by
10 SoCalGas's Storage Engineering Manager, James
11 Mansdorfer."

12 A Okay.

13 Q And the discussion of subsurface safety
14 valves goes on to page 20.

15 A Yes.

16 Q Can you explain how subsurface safety valves
17 relate to the lack of a dual mechanical barrier?

18 A Apparently they did not at the time have SSV
19 that would accommodate injection and production out
20 of both tubing and the casing. Though they installed
21 some, I think they installed three different ones in
22 SS-25 very early on and ended up removing them or
23 removing the guts of the valves because they couldn't
24 get them to work.

25 And then in later -- I saw maybe this quote

1 is from that note -- memo from James Mansdorfer that
2 he thought there was a new technology out there that
3 they could probably install in some of the wells that
4 would accommodate that sort of production and
5 injection.

6 Q I don't believe that exactly answered my
7 question.

8 I am wondering how SSSVs relate to the dual
9 mechanical barrier issue or whether they do?

10 A I think I answered that. I don't know
11 why --

12 Q Rather than I -- if you could restate your
13 response. I'm not --

14 I can see the history that is accounted
15 here, but operationally do they -- does inclusion of
16 an SSSV provide a dual mechanical barrier?

17 A No.

18 Q Okay. If a field is converted to tubing
19 flow only, those wells would have a dual mechanical
20 barrier, correct?

21 A Yes.

22 Q Do you know what the diameter of -- the
23 range of diameters for tubing is relative to a
24 production casing in a gas storage operation roughly?

25 A Do you want a range of the size of tubing?

1 Q Let me restate the question.

2 Tubing is significantly narrower than
3 casing, correct?

4 A In this case, it's 3-7/8 and the casing
5 outside of it is 7-inch.

6 Q So converting a field like Aliso Canyon to
7 tubing outflow only would have a significant impact
8 on deliverability, correct?

9 A Not necessarily.

10 Q How so?

11 A I think it --

12 Because they can replace the tubing with a
13 larger tubing. And the efficiency of a well depends
14 on more things than just the size of the tubing; so
15 it depends on the permeability of the reservoirs
16 they're producing out of, how much gas they can pack
17 in at what pressure and how fast that will flow back.

18 There could be other factors in the design
19 of the well and the well head that would allow for a
20 more efficient production; so I don't think you can
21 just pin it on the size of the -- the initial size of
22 the tubing.

23 Q "The initial size of the tubing."

24 So let me ask another question and see if
25 this helps clarify it.

1 But taking an existing field with the
2 parameters you noted as factors in deliverability, if
3 you take an existing field, holding all of those
4 parameters constant, and you put tubing into an --
5 existing wells that presently has 7-inch casing,
6 would that reduce deliverability of that field?

7 A If I put a new tubing in it?

8 Q Uh-huh.

9 A At what size?

10 Q You indicated big tubing.

11 A Well, you can't go any bigger than the
12 7-inch casing. But I think that they have tubing
13 that is in the 3- to 5-inch size. And, I mean, here
14 again, you would have to ask a drilling company to
15 spec that out for you to make sure that it would
16 work.

17 Q So let's say 3-inch.

18 A Okay.

19 Q Would that reduce deliverability to the
20 field?

21 A Not if you're going from a 2-7/8 to a
22 3-inch.

23 Q If you're putting -- I'm sorry, if you're
24 putting new tubing into a field that presently
25 doesn't operate as a tubing flow only field, so if

1 you're presently operating it as a dual flow gas
2 storage field, and you convert it to tubing flow only
3 and you're extracting it through a 3-inch tube, would
4 that reduce deliverability to the field?

5 A If you hold everything constant, and all
6 you're doing is you're going to produce out of the
7 tubing and not out of the casing, then you're going
8 to have a reduced flow.

9 Does that answer it?

10 Q Yes.

11 A You don't have to replace the tubing.

12 No matter what you do, if you're not
13 producing out of the casing and you keep the casing
14 the same size, you're still going to have reduced
15 flow, and holding everything else constant, if you
16 don't do anything else to improve efficiency.

17 Q Okay. Turning to page 23, middle of the
18 third paragraph down where it states "It is not
19 possible to determine what an inspection of the SS-25
20 casing would have shown in 1988, but it is possible
21 that the corrosion was present and detectable, and
22 steps could have been taken to avoid the leak in
23 2015."

24 Do you see that?

25 A Yes.

1 Q And the next sentence says "SoCalGas logged
2 some of the 13 remaining wells starting in 2007,
3 resulting in a gap from 1990 to 2007 when no
4 inspection logs were run in the 20 wells, according
5 to the available well records."

6 Do you see that?

7 A Yes.

8 Q And this relates to the 20 wells that were
9 on the 1988 memo, correct?

10 A Yes.

11 Q Did you evaluate the logs of any of the
12 13 remaining wells that were logged starting in 2007
13 referenced in that second sentence?

14 A Not before this testimony was published.

15 Q Have you done so since?

16 A Some of them, yes.

17 Q And what did they show you?

18 A I think that's probably part of my future
19 testimony, so --

20 MR. GRUEN: We'll note the objection for the
21 record.

22 MR. STODDARD: And the objection is?

23 MR. GRUEN: The objection is that this is
24 protected under attorney-client and attorney work
25 product privilege to the extent that it covers work

1 that is going to be -- testimony that is going to be
2 produced in the future. Excuse me.

3 BY MR. STODDARD:

4 Q Please turn to page 27, middle paragraph.

5 Do you see the sentence that says "Further,
6 since no formal risk assessment was conducted
7 regarding well integrity, wall thickness inspection
8 was not identified as a monitoring technique"?

9 A Yes.

10 Q Do you contend that SoCalGas was unaware of
11 casing inspection tools?

12 A No.

13 Q Can you explain your statement there what
14 you meant by "was not identified"?

15 A I think this statement comes from Blade, and
16 basically I -- what I think I am saying there is that
17 since there wasn't a formal risk assessment
18 conducted, it wasn't possible to -- to say that wall
19 thickness inspection was performed.

20 So, in other words, if you had a risk
21 assessment, a formal risk assessment, it would have
22 the results of this monitoring technique. It would
23 be pretty common in one of the first things you would
24 do in a formal risk assessment. But without a risk
25 assessment to look at, I can't conclude that the tool

1 was used.

2 Q And you say you think that's what you're
3 saying, but this is based entirely on the Blade
4 report, correct?

5 A Well, it came out of the Blade report, yes.

6 Q So this is what Blade is saying?

7 A Yes.

8 Q Turn to page 72, please.

9 A Okay.

10 Q Do you see where it states the "Well file
11 for SS-25A contains information" --

12 In the second paragraph?

13 A Yes.

14 Q -- "that might have been useful to SoCalGas
15 and its contractor in calculating the appropriate
16 requirements to kill the well in October 2015 and
17 thereafter."

18 A Yes.

19 Q What information were you referring to
20 there?

21 A I believe it's attached as an exhibit. It
22 was --

23 I'm just remembering that it's a Halliburton
24 report on the reservoir characteristics that were
25 logged by Halliburton. I'm not sure what the date

1 was. But it included permeability readings for the
2 full depth of the well.

3 Q So maybe it would be helpful just to read
4 the rest of the paragraph.

5 "For example, the Permeability of the Aliso
6 reservoir is in a record in that file."

7 A Yes.

8 Q And can you explain how permeability was a
9 factor for purposes of the well kill?

10 A When you look at the Blade model results,
11 Blade had to assume a permeability. They didn't have
12 the data; so the data was also not in the SS-25 well
13 file, it was in SS-25A.

14 So if someone went to look for permeability,
15 which would have been useful in their calculations or
16 models, assuming that any of the contractors like
17 Boots & Coots were actually doing calculations, say,
18 on a calculator or computer that we don't know about,
19 but let's say that they were, they would need that
20 piece of data.

21 And so there is a statement in the Blade
22 report that says if you change the permeability in
23 the model that they were running, you got different
24 results. And so I went looking for the permeability
25 data to see if it was available to Boots & Coots.

1 And for SS-25, it was not in that file, but
2 it was in the SS-25A file. And since they're right
3 next to each other, it would have been relevant.

4 Q And you said that that document was not
5 available to Blade, correct?

6 A Not available -- apparently not available.
7 They --

8 Q To Blade?

9 A Yes.

10 Q Yeah.

11 Boots & Coots is the operator that performed
12 the well kill, correct?

13 A Yes.

14 Q Earlier you indicated you don't have any --
15 any experience with well-control operations, correct?

16 A Not directly.

17 Q So then you're not aware of whether
18 permeability of the reservoir is something that a
19 well-control operator would typically consult or
20 reference or consider?

21 A I just went by what was reported in the
22 Blade report that they needed in order to do their
23 calculations.

24 So this was part of their -- part of their
25 calculations, and it was a factor that they didn't

1 have and had to make some assumptions about.

2 Q Okay. Let's move on to the next sentence in
3 the SS-25A well file.

4 There is an example of a well kill that
5 failed due to the use of an incorrect bottom hole
6 pressure.

7 A Yes.

8 Q This is another record that you contend
9 might have been useful to SoCalGas and its contractor
10 in calculating the appropriate requirements to kill
11 the well, correct?

12 A Yes.

13 Q Do you believe an incorrect bottom hole
14 pressure here was the reason that the well-kill
15 operation failed?

16 A Yes.

17 Q And what is your basis for that belief?

18 A Well, again, the models that Blade ran
19 consistently showed that they weren't weighting the
20 material properly. It wasn't heavy enough to
21 overcome the reservoir pressure, and they actually
22 recalculated based on old data that was provided or
23 acquired from SoCalGas and came up with a higher
24 bottom hole pressure, Blade did.

25 Q And you believe this is the case for kills 2

1 through 6?

2 A Yes.

3 Q The next sentence is "Other examples include
4 the shallow leak on SS-25A and the formation of
5 hydrates in an instance of leak repair, which may
6 have been useful information."

7 Do you contend that Boots & Coots did not
8 understand how to clear the hydrate that formed -- or
9 according to Blade the hydrate that formed at
10 SS-25A -- or, I'm sorry, at SS-25 during leak
11 response?

12 A No.

13 Q Do you contend that Boots & Coots was
14 unaware that there were hydrates in the well during
15 the second well-kill attempt?

16 A At the time --

17 Q Let me restate that. I'm sorry.

18 Do you contend that Boots & Coots was
19 unaware of the potential for hydrates after the first
20 well-kill attempt?

21 A No. I think they were always aware of the
22 potential.

23 Q How specifically would the document related
24 to formation of hydrates in the instance of leak
25 repair been useful to SoCalGas or Boots & Coots with

1 respect to the leak response?

2 A Well, without looking at the reference
3 documents, I can't say specifically. But as I recall
4 just sitting here, I believe there was a shallow leak
5 that might have been informative as to the depth of
6 the leak, and I don't remember the issue having to do
7 with the hydrates just offhand.

8 Q And to reiterate, based on these, the
9 footnote citations, this is based on your independent
10 review of the well file and not the Blade report,
11 correct?

12 A That's correct.

13 Q And Blade did not raise these concerns
14 regarding these records in connection with the well
15 kill, correct, to your knowledge?

16 A No. Let me correct that.

17 They raised the issue of not knowing the
18 permeability because that was in their report.

19 Q Blade not knowing the permeability?

20 A Yes, and not having -- not having access to
21 that data; so they made an assumption about what the
22 permeability was. I'm not sure what that was based
23 on. But they did provide additional calculations in
24 their report with different permeabilities and said
25 if it was this permeability, this would have

1 happened. So they were clearly considering a range.

2 Q But Blade did not raise the document-related
3 issues related to the other items -- the other
4 examples that you provide in this paragraph in
5 connection with the well-kill operation, correct?

6 A It's not in their report.

7 (Discussion off the record.)

8 MR. STODDARD: I guess can we go off the record
9 for a moment, please.

10 THE VIDEOGRAPHER: Just a moment, please.

11 We are off the record at 5:59 p.m.

12 MR. STODDARD: This is the end of disk number
13 four, Volume Number 1, of the deposition of Margaret
14 Felts on February 5th of the year 2020.

15 (Off the record.)

16 THE VIDEOGRAPHER: This is the beginning of disk
17 number five, Volume Number 1, of the deposition of
18 Margaret Felts on February 5th of the year 2020.

19 We are on the record at 6:22 p.m.

20 BY MR. STODDARD:

21 Q Ms. Felts, picking back up again with
22 Exhibit 1-7, I'm going to direct you to page 44 and
23 45.

24 The heading for this section is titled,
25 starting with lower case b) "SoCalGas Did Not Assess

1 the Relationship Between Groundwater In and Around
2 the SS-25 Well Site, and The Surface Casing Corrosion
3 of That Well."

4 Do you see that?

5 A Yes.

6 Q And on page 45 it states "SoCalGas's failure
7 to assess the relationship between groundwater in and
8 around the SS-25 wellsite and the surface casing
9 corrosion of that well on SS-25 constitute a
10 violation of Section 451."

11 Do you see that?

12 A Yes.

13 Q What is your understanding of practices at
14 other gas storage fields relating to the assessment
15 of the relationship between groundwater and well
16 casings?

17 A Anybody who drills a well has to at least
18 have a preliminary idea of where the groundwater is;
19 so that starts because you case down to the bottom of
20 the groundwater, fresh groundwater.

21 Q And by "case down," you mean set your
22 surface casing?

23 A Yes.

24 And so after that I would not know exactly
25 what the practices are at other gas facilities.

1 Q Okay. Thank you.

2 In terms of how to assess the relationship,
3 do you know how Blade assessed it for purposes of
4 their RCA investigation?

5 A I think they drilled a couple of wells.

6 Q And do you believe that that would be
7 required in the proximity of each well at Aliso
8 Canyon to understand the relationship between
9 groundwater and the wells?

10 MR. GRUEN: Again, I'm going to note the
11 objection that this is calling for SED to recommend
12 investigations to SoCalGas as to how to investigate
13 its field, which is beyond the scope of SED's
14 purview.

15 But she can answer.

16 MR. STODDARD: Actually, let me restate the
17 question.

18 Q Ms. Felts, what is your understanding
19 regarding how to assess the relationship of
20 groundwater in a storage field relative to the
21 casings in a gas well?

22 A There are options. You might do them all.
23 One is the simple option of being very familiar with
24 the geology after drilling wells and/or looking at
25 the geology reports from the drilling and then

1 understanding where sands, sand lenses outcrop and
2 water would fall on the sand at the outcrop and run
3 down the -- that part, that part of the strata. And
4 so where it would impact each well, you would know
5 approximately the thickness of that sand, and that
6 would be the exposure to that amount of water; so
7 that's a geologic approach that requires no drilling.

8 In addition to -- or alternatively, you
9 could set monitoring wells in those sands that are
10 cased to and then open to those sands so that you
11 could monitor the depth of groundwater at any point
12 in the area. You would have to --

13 You wouldn't set a well next to every well,
14 but you would set a monitoring well in an appropriate
15 place where your geologist thinks that there might be
16 some variation in the depth of water in that lens,
17 that sand lens.

18 There could be other ways to do some sort of
19 monitoring that might hit in between those two. You
20 might have historical water production when you were
21 drilling a well like a newer well and be able to
22 report that, and then connect that to a sand lens and
23 have the knowledge in the record that there is water
24 in a -- at a certain depth in one well that might
25 carry over to another one because of the geology.

1 Q Okay. And circling back on your earlier
2 statement, it would be necessary to have an
3 understanding of groundwater depths for purposes of
4 setting the surface casing, correct?

5 A Yes.

6 Q Okay. Also on page 45, you see the
7 discussion of cathodic protection, where it states
8 "Cathodic protection systems are commonly used to
9 protect pipelines from corrosion and are sometimes
10 used on well surface casing strings"?

11 A Yes.

12 Q What is your understanding of how cathodic
13 protection works?

14 A Do you want a technical explanation or just
15 something generic?

16 Q Your choice.

17 A Well, there is --

18 I guess you would look for a location that
19 would be defined on an anode on a well casing or a
20 pipeline, and a cathode location somewhere else. And
21 the flow of electricity from one to the other can
22 result in the removal of metal, usually iron, but
23 also iron component of steel, from an unprotected
24 pipeline.

25 So then when you do cathodic protection, you

1 basically reverse the polarity on that flow, on that
2 electrical flow.

3 Q Also on page 45 you state "Cathodic
4 protection would have provided corrosion protection
5 to the 11 3/4-inch casing, but would not have
6 protected the 7 inch casing inside the 11 3/4 inch
7 casing."

8 Is that correct?

9 A Yes.

10 Q Why is it important in the context of your
11 testimony and alleged violations that cathodic
12 protection be applied to a surface casing if it would
13 not have protected the 7-inch casing?

14 A Well, so the purpose of providing it to the
15 surface casing was because that was what is exposed
16 to water so more likely to corrode.

17 And what was the other half of your
18 question?

19 Q That's fine. I can ask another question.

20 Did corrosion to the surface casing in your
21 view cause the failure in the 7-inch production
22 casing at SS-25?

23 A I'd have to go back and look at the details
24 of the Blade report, but my understanding is that
25 there was water entering the -- water entering the

1 casing at some point the surface casing or below at
2 the 7-inch casing that was causing external
3 corrosion; so I'd have to look at the drawing and
4 tell you whether I could answer that specific
5 question correctly.

6 Q Water also could have been coming up from
7 under, correct?

8 A Coming up from under --

9 Q Under the shoe?

10 Could have been entering --

11 A Could have been, yes. It could actually
12 just be produced with the gas. There is no telling
13 how you can get water into a well.

14 Q So you're not contending that corrosion of
15 the surface casing was the point of entry for water
16 that caused the corrosion at SS-25 production casing?

17 A I am not. But Blade seems to think that
18 that was contributing to it because they found the
19 MIC in the -- as a cause of the corrosion, which
20 would require some moisture; so I think they tied it
21 to surface moisture or shallow moisture.

22 Q But you're not sure?

23 A I'd have to go back and look at it. It's
24 been a while since I read that section.

25 Q Do you have prior experience with cathodic

1 protection?

2 A Well, I reviewed a lot of records with PG&E
3 on cathodic protection. And before that we had
4 cathodic protection on pipes at the oil refinery and
5 at the chemical refinery where I worked.

6 And other than that, as a consultant, I
7 think the only places I might have run into it is if
8 there was cathodic protection on piping or
9 underground storage tank systems that had to be
10 disabled while we worked on them is all. I didn't
11 have to operate it or analyze it.

12 Q Okay. So you reviewed records related to
13 it; you didn't personally apply cathodic protection?

14 A No.

15 Q Or advise regarding installation of cathodic
16 protection?

17 A I would call an expert in cathodic
18 protection.

19 Q And in the cases you mentioned before, they
20 were all pipeline cases; is that correct?

21 A Maybe underground storage tanks. I'm not
22 sure.

23 Q What sort of underground storage tanks?

24 A It would be petroleum.

25 Q Are there any --

1 Is there any difference that you're aware of
2 applying cathodic protection to above-ground pipes
3 versus underground storage wells?

4 A I think it's a little bit more complicated
5 for underground wells because they're vertical, and
6 because you might have, like, SS-25 and 25A and
7 25B, co-located wells that will interfere if you
8 don't design the system correctly.

9 Q How --

10 A But it's not impossible. It's just that
11 it's a different application of cathodic protection.

12 Q Can you explain how you avoid interference
13 with neighboring wells through system design?

14 A No. But I can look it up for you, and I can
15 call an expert. And I think I provided some
16 reference documents that included that information in
17 response to DR 3.

18 DR 3? Your DR 3.

19 Q Data Response 3?

20 A Yes.

21 Q And those documents --

22 Did you prepare Data Response 3?

23 A Yes.

24 Q And you collected the documents --

25 A Yes.

1 Q -- for purposes of Data Response 3?

2 A Yes.

3 Q Do you recall when you collected those
4 documents?

5 A After we received Data Request 3, whenever
6 that was.

7 Q Is it your opinion that cathodic protection
8 should be applied at the surface casings of all gas
9 storage wells?

10 A I think it should be applied where there is
11 a threat of corrosion. There may be instances where
12 there is not.

13 Q There may be instances where there is no
14 threat of corrosion in a gas storage well in the
15 ground?

16 A Well, yes. I think that's possible.

17 Q Are you aware of any specific examples of
18 that?

19 A I think actually in the Aliso field there
20 might be some areas that they feel like would not
21 require it, and then there is other areas where they
22 think it's necessary.

23 Q But if there is a threat of corrosion, which
24 would include, based on what you said previously, I'm
25 guessing presence of water generally in the

1 environment, geology perhaps, you would believe
2 cathodic protection is appropriate if there is a risk
3 of corrosion?

4 A It certainly is a technology that should be
5 investigated. There is other things you can do. You
6 can put chemicals down the well. You can coat the
7 casing if you happen to be drilling the well now and
8 installing it. There --

9 You know, I think there are other things
10 that you could do if you did not want to apply
11 cathodic protection. But I do think that cathodic
12 protection is the first thing that most engineers
13 would look at.

14 Q In terms of putting chemicals down the well,
15 what sort of chemicals are you referring to there?

16 A Well, typically it would be something like
17 biocide, something to kill the MIC.

18 Q And that would generally protect against
19 corrosion of the internal diameter of the casing,
20 correct?

21 A Yes, won't help you with the external.

22 Q And in terms of the specially-treated
23 casings, that's --

24 A External.

25 Q That's external --

1 A It could be external and internal.

2 Q But again for newly-drilled wells --

3 A Well, yeah, if your casing is already --

4 Q -- not for existing wells?

5 A -- in ground and cemented, you're not going
6 to be able to do it.

7 Q Thank you.

8 Is it your opinion that SoCalGas should have
9 cemented the production casing at SS-25 all the way
10 to the surface?

11 MR. GRUEN: Objection. Just vague as to time.

12 BY MR. STODDARD:

13 Q Is it your contention that SoCalGas should
14 have cemented the surface casing at SS-25 all the way
15 to surface sometime after it acquired the field?

16 A It would have been a prudent thing to do.

17 Q For existing wells that are in gas storage
18 fields in California that are not cemented to
19 surface, do you believe that those wells should be
20 cemented to surface to protect against the risk of
21 corrosion?

22 A You mean should they be done -- should it be
23 done now?

24 Q Should it be a retrofit?

25 A I think it's an economic assessment that

1 needs to be done there to determine what the risk is
2 of leaving it as is versus cementing it and having
3 the protection for the rest of the life of the well.
4 And some of those wells are pretty old; maybe it's
5 not cost effective. Maybe you're going to be
6 shutting them down pretty soon anyway and replacing
7 them.

8 Q So cost effectiveness of the measure would
9 be relevant to the consideration of whether it should
10 be done?

11 A I think so. But also risk assessment. If
12 there is a risk of it blowing out, that could be part
13 of your cost-effective calculation.

14 Q Would you contend that a failure to cement
15 an existing well to surface would be a violation of
16 451?

17 A Probably depends on the specifics of the
18 well.

19 Q Including cost effectiveness.

20 A Well, for a 451 violation, I think we would
21 look at the risk primarily of there being a failure
22 that would create a problem at the surface.

23 Q As well as feasibility of the operation?

24 A Feasibility would certainly be part of the
25 equation.

1 Q Would assessment of risk include past
2 success with addressing well failures and leaks?

3 A For example? What do you mean?

4 Q If an operator had -- historically had
5 success with identifying leaks and repairing them as
6 they arose, would that be relevant to your
7 consideration as to whether it would be a violation
8 of 451 if they chose not to cement the casing to
9 surface?

10 A So we're still talking about casing, the
11 surface casing?

12 Q Sure. Uh-huh. No, I'm sorry, the
13 cementing.

14 A "Cementing"?

15 Q Yeah.

16 A So if they had a good record in the past of
17 fixing leaks in surface casing that was not cemented,
18 would that be relevant to the decision not to cement?

19 Q Let me restate this.

20 A Okay.

21 Q And let's limit this to the cementing issue.

22 A Okay.

23 Q You said that --

24 We talked about how cost effectiveness would
25 be one factor in considering whether or not to cement

1 to surface.

2 You said risk assessment would be another
3 factor?

4 A Yes.

5 Q My question is whether part of that risk
6 assessment would include past success with addressing
7 and fixing leaks as they arose.

8 A I wouldn't give that a lot of weight unless
9 in the process there had been determination of what
10 the cause of those leaks were; so you could
11 accurately forecast whether or not the problem was
12 going to continue with other wells.

13 So if all they're doing is patching things
14 to keep -- and well after well is failing for the
15 same reason, but they don't know the reason that it's
16 failing, then you would know things are going to
17 continue to fail. And in that instance, the fact
18 that they're successful at plugging holes in wells
19 doesn't really help with a risk assessment, because
20 the risk continues for other wells. They're going to
21 continue to leak if you don't know how to stop the
22 cause of the leaks.

23 Q Is that true if the consequences of those
24 leaks are not significant?

25 A Well, I suppose SoCalGas might be able to

1 categorize some leaks as not consequential or not
2 important and others important. But I'm not aware of
3 how they would do that.

4 You know, a failed well is a failed well,
5 and you have to fix it. And if you don't want it to
6 happen to the next well over, then you need to find
7 out why it failed.

8 Q Speaking hypothetically and abstractly,
9 frankly not even in the context of gas storage
10 operations, would you agree that a risk assessment
11 should include both the likelihood of a given event
12 and the consequences of the event?

13 A That's a typical statement for pipeline risk
14 assessments.

15 Q Okay. Moving on to page 47 of the same
16 exhibit. This violation -- alleged violation is
17 related to -- stated as "SoCalGas lacked a real-time
18 continuous pressure monitoring system for well
19 surveillance, which prevented an immediate
20 identification of the SS-25 leak and an accurate
21 estimation of the gas flow rate."

22 Are you familiar with what other gas storage
23 operators do with respect to real-time pressure
24 monitoring?

25 Let me restate that.

1 Are you familiar with what other gas storage
2 operators did as of October 23, 2015 with respect to
3 real-time pressure monitoring?

4 A No. I did not look into that. This is
5 based on the Blade report and what they determined.

6 Q What is your understanding of what SoCalGas
7 would have done or could have done had they
8 immediately identified the leak due to real-time
9 pressure monitoring?

10 MR. GRUEN: I'm going to --

11 MR. STODDARD: I'm sorry, I'll restate that.

12 Q If SoCalGas had been able to immediately
13 identify the leak because of a real-time pressure
14 monitoring system, what do you contend SoCalGas could
15 have done that would have helped mitigate the
16 consequences of the incident?

17 MR. GRUEN: I'm going to note an objection to
18 the extent this is calling for Ms. Felts to recommend
19 fixes or recommend investigations.

20 Again, this is outside the purview of SED
21 and it is -- so it's beyond the scope of what SED is
22 called to do.

23 But Ms. Felts can answer the question.

24 THE WITNESS: Okay. Just a minute. Let me see
25 what Blade said on this.

1 Okay. So on page 48 there is additional
2 information about that.

3 BY MR. STODDARD:

4 Q Would you please read?

5 A In the third paragraph, "The lack of
6 real-time pressure measurements prevented the
7 immediate identification of the 7-inch casing
8 failure."

9 I guess you might have to read the paragraph
10 ahead of that to get the context.

11 "But constant monitoring of the tubing
12 production casing and surface casing pressures will
13 provide better insight into operational deviations in
14 all wells."

15 So I think here the concept is that if you
16 have real-time data, you would be able to see exactly
17 what was going on in the well, and because they
18 didn't have that, they were somewhat hampered in
19 being able to detect a leak before it actually broke
20 out to the surface and they started to smell it,
21 which I think is the way they detected it.

22 So this is a plan, an idea of how SoCalGas
23 could have been monitoring the system to see the --
24 see the leak in an operational data manner rather
25 than just waiting until it leaks to the surface.

1 Q I understand how -- your response, I
2 believe, describes how continuous real-time pressure
3 monitoring would have enabled identification of the
4 leak at an earlier time.

5 A Right.

6 Q What would that identification have enabled
7 SoCalGas to do in response?

8 A Their response would probably still be to
9 shut down the well and I'm guessing and to start a
10 well-kill process. It's probably Blade's thought on
11 this, and I think you would have to ask Blade, that
12 an earlier detection might have prevented some of the
13 damage from occurring and might have allowed the
14 first -- the initial well kill to be successful. But
15 here again, I think you should ask Blade that
16 question, not me.

17 Q Well, it is your testimony; so I'm going to
18 ask you.

19 How would shutting the well immediately have
20 prevented further damage in your view?

21 A Well, this well was already leaking through
22 the casing when they shut it down, whereas -- I mean,
23 significantly leaking. If they had been able to
24 detect a smaller leak first, they might have had a
25 better outcome on their original well kill. That's

1 my read on it.

2 Q How much earlier do you think that would
3 have needed to be? Are we talking minutes, hours,
4 weeks?

5 A I would --

6 I don't know because I don't know how fast
7 the problem within the well was occurring. But my
8 understanding is that the real failure that caused --
9 caused the detection outside of the well on that day
10 was fairly sudden.

11 I mean, the loss of gas at that -- in that
12 amount was a result of a fairly sudden event within
13 the well.

14 On the other hand, microbial corrosion and
15 small leaks through holes is not sudden. And so it's
16 possible they might have picked up a problem earlier,
17 maybe even weeks earlier, through regular monitoring.

18 Q So a continuous real-time pressure
19 monitoring system would have been useful in
20 identifying development of a leak over a period of
21 time?

22 A Right. Or a major leak. I think you would
23 be -- you would be looking at a leak, but a major
24 leak might be preventible.

25 Do you understand?

1 Q A major leak might be preventible if you
2 catch it early?

3 A Yes.

4 Q As it's developing?

5 A You would catch a smaller leak earlier,
6 right.

7 Q Okay. Separately the second part of the
8 statement in paragraph 8 on page 47, the first is the
9 immediate identification of the leak, which we
10 discussed. The second, an accurate estimation of the
11 gas flow rate.

12 Can you explain why continuous real-time
13 pressure monitoring is necessary for accurate
14 estimation of the flow rate?

15 A If they had detected the well, the problem
16 earlier, they would have been able to shut in the
17 well, avoid the catastrophic failure of the pipe
18 casing, and then they might have had a better chance
19 of being able to estimate the gas flow rate or would
20 have had a better measure of gas flow at the time the
21 well was shut in.

22 So what they did was they let the well fail
23 for lack of monitoring, and once it failed and was
24 blowing out, up the side of the casing, there wasn't
25 a way to measure the gas flow rate.

1 Q So you don't believe that they could get
2 accurate -- or that --

3 You are aware that there are pressure gauges
4 on the well head and on the casing?

5 A Yes, but that was useless once the well blew
6 out.

7 Q Why is that?

8 A Because the gas was coming up outside of the
9 well. It wasn't coming up through those, past those
10 instruments anymore.

11 Q And prior to the blowout?

12 A Well, prior to the blowout they had
13 measurements of the flow in and out of the well
14 through the piping and the instrumentation. After
15 the blowout, that instrumentation wasn't useful.

16 Q So what would a continuous real-time
17 pressure monitoring system have provided that they
18 couldn't have collected prior to the blowout?

19 A The way I connect this is that the real-time
20 monitoring system would have probably prevented the
21 blowout because they would have detected the leak at
22 a lesser amount and shut in the well; so they would
23 have had their readings at that point in time. But
24 if they shut in the well, they wouldn't have to use
25 the readings. They would have the flow, but it's

1 kind of --

2 Q So it's more about the ability to shut in
3 the well and prevent further development of a smaller
4 leak into a bigger leak --

5 A Right.

6 Q -- than it is about the flow rate?

7 A I think so.

8 Q Okay. But you're not sure?

9 A Well, because that seems to be tacked onto
10 there, and I don't know why, I would have to go back
11 and look at it again to see how that developed.

12 Q I don't know either. I'm sorry, I
13 interrupted you.

14 I mean for purposes of this violation, you
15 would agree that you're relying heavily on the Blade
16 report, correct?

17 A Yes.

18 Q Entirely on the Blade report?

19 A This one is from the Blade report, yes.

20 Q And maybe you don't fully understand what
21 Blade was saying on this issue.

22 A I think the -- I think the caption here was
23 refined from the Blade report, and so it looks to me
24 like two issues are merged together here.

25 But since it's all one violation, I don't

1 know if it makes any difference if you drop out the
2 accurate estimation of gas flow rate, it's still the
3 same violation.

4 Q So you believe you understand and have
5 accurately stated Blade's position with respect to
6 preventing development of a leak over time by
7 shutting in a well?

8 A I think the following -- the text that
9 follows that heading -- the heading is a little
10 weird, but the text that follows it I think
11 accurately represents what Blade said.

12 Q Do you believe, Ms. Felts, that it's
13 important or critical when you're asserting
14 violations that you have a good understanding of the
15 underlying facts related to and supporting those
16 violations?

17 A Sure.

18 Q On page 50, it says in the middle paragraph,
19 "Industry technology has evolved for real time
20 pressure, temperature, flow, and vibration monitoring
21 but, surprisingly, there were no significant
22 differences in the monitoring plan from 1989."

23 Do you see that sentence?

24 A Yes.

25 Q How has industry technology evolved -- let

1 me restate that. I'm going to break these into
2 separate questions.

3 How has industry technology evolved for
4 real-time pressure monitoring?

5 A Well, I think over a period of time the
6 accuracy and reliability of any instrumentation that
7 might be used on a well has improved.

8 Q How has technology evolved for temperature
9 monitoring?

10 A I would say not a lot. It's still pretty
11 much the same log. There may be more accuracy in the
12 feedback on the log. But basic technology is the
13 same.

14 Q So then the statement you don't agree with?

15 A I don't not agree with it. I am just not
16 aware of whatever Blade was aware of. It's footnoted
17 to Blade's report, and apparently they have an
18 opinion about that that you could ask them about.

19 Q Turning to page 51, Section C. "Additional
20 Violations," Number 1 is "SoCalGas Knew That SS-25
21 Released Both Crude Oil and Natural Gas During the
22 Aliso Canyon Natural Gas Storage Incident, But Did
23 Not Disclose This Fact to the Los Angeles Department
24 of Public Health."

25 Do you see that section?

1 A Yes.

2 Q You weren't personally involved in any
3 discussions with DPH related to this issue, were you?

4 A No.

5 Q What did you do to get yourself comfortable
6 with sponsoring your testimony on this issue?

7 A Originally my understanding was that the
8 Department of Public Health was going to sponsor this
9 section and would support it, and so I didn't do
10 anything other than read it. But I do have a
11 background in environmental technologies,
12 environmental issues, and so I felt like I was pretty
13 comfortable with supporting it.

14 Q But you didn't have personal knowledge
15 relating to the Department of Public Health's
16 specific dispute here with SoCalGas, correct?

17 A The only thing I had were the letters that
18 went back and forth that were provided to me. I
19 think they're attachments.

20 Q If you turn to page 52, do you see the last
21 sentence of this section which says "These dates and
22 the precise nature of this violation may be modified
23 pending additional testimony from intervening parties
24 to this proceeding with expertise in public health"?

25 A Yes.

1 Q Intervening parties based on your prior
2 statement, I understand that intervening parties to
3 this proceeding with expertise in public health was
4 DPH?

5 A That was my understanding.

6 Q Were there other potential parties that you
7 were aware of?

8 MR. GRUEN: Objection. Calls for speculation.

9 BY MR. STODDARD:

10 Q Were you aware of any other parties that
11 were being actually -- no, I'm going to restate it.

12 Were you aware of any other parties that
13 were considering intervening in this proceeding on
14 this issue?

15 A As interveners.

16 Q The sentence says "These dates and the
17 precise nature of this violation may be modified
18 pending additional testimony from intervening parties
19 to this proceeding with expertise in public health."

20 I'm asking whether "parties" there refers to
21 anyone other than DPH?

22 A I don't know.

23 Q You're not aware of anyone else that would
24 have been?

25 A I was not told of anyone else.

1 Q Okay. Did you draft this sentence?

2 A No.

3 Q And it's your understanding that there was
4 an arrangement by which DPH would come and provide
5 the supporting factual basis for this violation?

6 A Yes.

7 Q You indicated that you reviewed letters
8 related to this violation; is that correct?

9 A There is at least one letter from DPH to
10 SoCalGas and one from SoCalGas to DPH that I believe
11 were attachments to this testimony that I read.

12 MR. STODDARD: I'm going to introduce
13 Exhibit 1-31.

14 (Deposition Exhibit 1-31 was
15 marked for identification and is
16 attached hereto.)

17 BY MR. STODDARD:

18 Q Do you recognize this document, Ms. Felts?

19 A Yes.

20 Q You reviewed this letter?

21 A Yes.

22 Q And you considered SoCalGas's arguments
23 outlined in the five paragraphs on pages 1, 2 and 3?

24 A Yes.

25 Q Did you discuss with Darryl whether or not

1 to include this violation based on SoCalGas's
2 response?

3 A I looked at this letter, and then I looked
4 at actually --

5 I was going to say that I looked at the
6 analysis that SoCalGas did, but that was after the
7 testimony came out. So I had this letter. I think
8 that the main thing that I discussed with Darryl was
9 that it was the statement on page 2, it says the --

10 See on page 2, the second full paragraph
11 says, "Consistent with those statements air samples
12 taken by DPH and other agencies during and
13 immediately after the incident were analyzed for
14 compounds that are typically found in crude oil,
15 including benzene, toluene, ethylbenzene and xylene,"
16 which is typically referred to as BTEX.

17 That statement concerned me because
18 naturally those four things are typically found in
19 crude oil, but they would not necessarily tell you
20 what heavy components of oil might be dropping out of
21 the air emissions from the well.

22 So I felt like this is only a partial -- a
23 partial answer, that it seemed like DPH had asked for
24 a more extensive analysis of the air emissions, the
25 gas emissions and didn't get it.

1 Q As framed the violation relates to a failure
2 to disclose, correct?

3 A I understand that, and I agree with you,
4 yes.

5 Q Okay. Thank you.

6 Turn to page 52, please.

7 A Okay.

8 Q See paragraph 2, "In Multiple Instances,
9 SoCalGas Did Not Cooperate with SED During Its
10 Pre-Formal Investigation Following the Incident on
11 Aliso Well SS-25 that Began on October 23, 2015."

12 Do you see that paragraph?

13 A Yes.

14 Q You were not personally involved in SED's
15 preliminary investigation, correct?

16 A No.

17 Didn't we discuss this earlier? Seems like
18 we've already been through this one.

19 Q Not what we're about to discuss.

20 A Okay.

21 Q Did you --

22 And again, to confirm though, you didn't
23 talk to anyone related to these violations other than
24 Mr. Gruen, correct?

25 A That's correct.

1 Q Okay. With respect to SoCalGas's failure to
2 produce Boots & Coots witnesses for an examination
3 under oath, what did you review?

4 MR. GRUEN: I'm sorry, is there a particular
5 area of testimony that you're asking about?

6 THE WITNESS: I think it must be back --

7 BY MR. STODDARD:

8 Q See page 55 if you need to.

9 A There are letters referenced in the
10 footnotes 390 and 391.

11 Q So a letter from SED Director Malashenko and
12 again another letter from SED Director Malashenko.

13 A Yes. Let's see if there's more.

14 On page 56 there is additional footnotes.
15 And I did not see subpoenas, I did see
16 correspondence.

17 Q You didn't see the subpoenas because they
18 weren't included, or you didn't review them?

19 A I didn't review them.

20 Q In your practice as an attorney, have you
21 ever propounded subpoenas on witnesses?

22 MR. GRUEN: I'm going to object to relevance
23 here.

24 THE WITNESS: Not related to utilities.

25 BY MR. STODDARD:

1 Q In any context?

2 A A couple of times.

3 Q Have you ever provided a subpoena on another
4 party to compel appearance of a third party?

5 A No.

6 MR. GRUEN: Same objection.

7 MR. STODDARD: I'm going to introduce
8 Exhibit 1-32.

9 (Deposition Exhibit 1-32 was
10 marked for identification and is
11 attached hereto.)

12 BY MR. STODDARD:

13 Q Do you recognize this document, Ms. Felts?

14 A I think I've seen it before.

15 Q If you turn to page 56 of your testimony,
16 you'll see this letter excerpted starting at the
17 bottom of 56.

18 A Yes.

19 Q And continuing all through page 57 and 58.

20 A Yes. Right.

21 Q We would note that despite the liberal
22 quotation, it excludes most of the discussion --
23 actually the entire discussion of law from the
24 letter.

25 If you will reference page 3 of the letter

1 itself, Exhibit 132.

2 A Okay.

3 Q Do you see what --

4 Do you see that there the discussion of
5 law starting with reference to Snyder v. Southern
6 California Edison?

7 A Yes.

8 Q And you agree that that is not included in
9 this testimony?

10 A Yes.

11 Q Do you recall reading this?

12 A I -- I read it. I didn't spend a lot of
13 time on the law part.

14 Q But you considered it?

15 A Yes.

16 Q And do you agree that SoCalGas cannot
17 legally compel appearance of a third party --

18 MR. GRUEN: Objection.

19 BY MR. STODDARD:

20 Q -- without legal process?

21 MR. GRUEN: Objection. Calls for legal
22 conclusion.

23 You can answer if you're able.

24 THE WITNESS: My participation in this testimony
25 is technical, not legal.

1 BY MR. STODDARD:

2 Q So you can't testify to the facts in this
3 violation?

4 A To.

5 MR. GRUEN: Objection. Mischaracterization of
6 testimony.

7 BY MR. STODDARD:

8 Q Are you able to testify to support this
9 alleged violation?

10 A The violation is just as I read it, that you
11 refused to produce a witness over a period of time
12 when you were requested. That's factual. The
13 argument underlying that is legal, and I did not
14 develop that or spend any time reviewing it; so my
15 part of the testimony is only on the facts.

16 Q But you have yourself prepared and served
17 subpoenas, correct, for appearance of witnesses?

18 A Yes. I don't know how that is relevant in
19 this particular contract that I have with the PUC.

20 Q Well, you're aware how subpoenas work?

21 A Yes.

22 Q Okay. And you've never, between --

23 To restate what you said earlier, you've
24 never served a subpoena on a third party -- on a
25 party for production of another party?

1 MR. GRUEN: Objection. Asked and answered.

2 THE WITNESS: No.

3 BY MR. STODDARD:

4 Q Do you believe it should be a violation of
5 law if SoCalGas is compelled to do something that is
6 not within its legal power to do?

7 MR. GRUEN: Objection. Calls for legal
8 conclusion.

9 THE WITNESS: Yeah.

10 MR. GRUEN: I've got to say, this is -- it's --
11 We've been here cooperating, now it's going
12 on the -- I think the eleventh hour, and now we're
13 continuing to discuss calling for legal conclusion.

14 We agreed to come down here and do this
15 deposition.

16 MR. STODDARD: You asked to come down here and
17 do this deposition, it was your request.

18 MR. GRUEN: We agreed to do the deposition.

19 Let's not mince words. We agreed to do the
20 deposition, but we're going on and on.

21 And we did not agree to come down here and
22 provide Ms. Felts to answer questions that are
23 calling for a legal conclusion. That's beyond the
24 scope of what we've agreed to do here.

25 If we're going to keep going down this

1 road --

2 I think this line of questioning about legal
3 conclusions and what her views are on the law should
4 wrap up maybe in a question or two.

5 MR. STODDARD: Are you instructing the witness
6 not to answer the question?

7 MR. GRUEN: No, she can answer. But the line of
8 questioning is wasting our time.

9 MR. STODDARD: Darryl, we were happy to come to
10 San Francisco, you guys wanted to do it down here.

11 We have a right to our deposition.

12 MR. GRUEN: That's --

13 MR. STODDARD: And she has asserted violations
14 that -- a lot of them are based, frankly, on law.
15 And the truth is, if she can't testify to those
16 facts, we would ask for a witness.

17 MR. GRUEN: That is completely mischaracterizing
18 what I'm saying.

19 I'm going to read for the record in light of
20 this -- if you'll indulge me, we're going to have to
21 go here, I hoped we wouldn't. But bear with me a
22 second.

23 Can we go off the record for a second?

24 MR. STODDARD: Actually, in the interest of
25 time, because I know we want to keep moving, can I

1 try restating the question and see if your objections
2 continue?

3 MR. GRUEN: Of course.

4 MR. STODDARD: All right.

5 Q Are you aware of any authority that would
6 permit SoCalGas to compel production of a third-party
7 entity?

8 MR. GRUEN: I'm going to restate the objection
9 and I'm going to note here that --

10 I'm going to read a quote from the
11 pre-hearing conference statement, the transcript, at
12 pages 43 and 44, that we -- that captures the
13 understanding that we've had.

14 Unfortunately -- so this starts to quote ALJ
15 Kenny.

16 "The next question concerns the
17 deadline for SED to submit alleged
18 violations and the factual and legal
19 justifications for each alleged
20 violation. My question is whether it
21 would be reasonable to set a deadline
22 of opening testimony for SED to submit
23 alleged violations and the factual
24 justifications for each alleged
25 violation and set a deadline for

1 opening briefs for SED to submit the
2 legal justifications for its alleged
3 violation.

4 "Would any apparent like to
5 respond to my question? SoCalGas."

6 Quoting Mr. Stoddard:

7 "SoCalGas's position on this is
8 that SED should identify the alleged
9 violations with specificity in its
10 opening testimony sooner, if possible;
11 but in its opening testimony would be
12 acceptable to SoCalGas as we had
13 proposed in our prehearing conference
14 statement."

15 My co-counsel, Mr. Sher:

16 "Your Honor, SED would not
17 necessarily be opposed to such if
18 SoCalGas agreed that now that it would
19 not waste time cross-examining SED's
20 witness as to their legal basis for
21 tying violations to code sections, et
22 cetera."

23 "ALJ KELLEY: Does SoCalGas have a
24 response at this time?

25 "MR. STODDARD: SoCalGas is not

1 going to waive any rights to
2 cross-examination. Although I would
3 ask for clarification what exactly is
4 meant by 'legal basis' here.

5 "MR. SHER: The way your Honor set
6 this out is that the violations would
7 be set forth in the opening. And then
8 the legal issues" --

9 I might highlight the legal issues there,
10 continuing the quote --

11 -- "would be discussed in the
12 briefing. To the degree it is
13 likely" -- "highly unlikely that SED's
14 witness would be a lawyer, so we don't
15 want SoCalGas, if we are going to do
16 this all in our opening testimony, to
17 cross-examine the witness as to their
18 legal basis for concluding that this
19 is a violation, for example 451.

20 "MR. STODDARD: SoCalGas does not
21 object to that."

22 Thank you.

23 It was SED's understanding that preparing
24 the violations at SoCalGas's request would not lead
25 to a set of questions of the witness as to the legal

1 analysis that would be required to support them
2 underlying the testimony. These are briefable
3 issues. That's why I'm recommending that we move on,
4 we cut this line short.

5 If you want to continue with this line of
6 questioning, we're here, but we maintain that this is
7 a waste of time to do it here.

8 MR. STODDARD: An important part of that that
9 you read was Nicholas's statement that your witness
10 was not likely to be a lawyer, and it was -- part of
11 it, what he said there was predicated upon that
12 representation. First.

13 Second of all, this isn't cross-examination,
14 this is discovery.

15 Third --

16 Can I see this?

17 -- this issue has been addressed before in
18 front of the Commission. This is a transcript in
19 which Ms. Felts was a witness in the PG&E San Bruno
20 proceeding.

21 Are you familiar with this?

22 MR. GRUEN: I haven't seen the transcript that
23 you're referring to. I don't know if I'm familiar or
24 not. I'm sorry.

25 MR. STODDARD: Counsel for PG&E, Joe Malkin, was

1 representing -- was representing PG&E, and Bob Cagen
2 was opening ORA. Bob Cagen stated an objection to a
3 line of questioning related to Rule 1, said "Excuse
4 me, Your Honor, I think I'm going to object to this.
5 This really is calling for a legal conclusion rather
6 than anything else that is valuable in the way of
7 fact finding."

8 Joe Malkin said "Well, Your Honor, this
9 witness has told us that she is advocating that the
10 Commission find PG&E guilty of this Rule 1 violation.
11 I am probing her thought process and what underlies
12 her advocacy to the Commission. And to the extent
13 that Mr. Cagen is concerned that we're sliding over
14 into legal opinions, as you heard yesterday,
15 Ms. Felts is, in fact, a lawyer; so the objection of
16 a legal issue being addressed today by a non-lawyer,
17 which was raised by Ms. Halogan yesterday, doesn't
18 apply."

19 And the judge said "Okay. I'm going to
20 allow it. Go ahead."

21 And the judge in this case was your
22 co-counsel, Amy Yip-Kikugawa. And --

23 MR. GRUEN: Can I have an opportunity to respond
24 to that?

25 MR. STODDARD: -- the discussion we had at the

1 pre-hearing conference was not reflected anywhere in
2 the judge's scoping ruling.

3 Ms. Felts is asserting violations of law
4 throughout her testimony. You had the ability to
5 scope your testimony however you saw fit and you
6 chose to do it that way. And you included law, but
7 you also included conduct. And the question that
8 we're asking relates to the connection of the conduct
9 and the law.

10 MR. GRUEN: If I may.

11 I appreciate you raising the issues.

12 I will note that SoCalGas, in its response
13 to our request to provide a person most knowledgeable
14 related to the -- the SoCalGas's alleged assertions
15 regarding Mr. Bruno. In response to our request for
16 a deponent, we had understood that SoCalGas had only
17 attorneys and argued that it couldn't provide someone
18 on that basis was our understanding.

19 And when the ALJ ruled that, in fact,
20 SoCalGas was to provide a non-attorney, SoCalGas
21 continued to provide someone who is, in fact, an
22 attorney. I understand he is not in that role as a
23 represented counsel. However, Mr. Jason Egan,
24 according to my last checking on the State Bar of
25 California website yesterday, is indeed a licensed

1 attorney, and yet he is being provided to provide
2 testimony in that deposition; so it's the same thing,
3 yet our understanding, per the ruling, is he was
4 provided as indeed a non-attorney in compliance with
5 the ruling, similar to what we're doing here.

6 I understand there are a number of attorneys
7 practicing for SoCalGas who I've had the ability to
8 come in to work with who indeed are attorneys but
9 don't appear or practice as designated counsel for
10 SoCalGas. That's one.

11 Two, it remains our position that questions
12 about discovery for purposes of this exercise are no
13 different, are no different than cross-examination;
14 so this line --

15 It is for the purpose -- to the extent this
16 is for the purpose of determining cross-examination,
17 we maintain there is no distinction. That's a
18 distinction without a meaning.

19 We think that this --

20 We distinguish from San Bruno, this is its
21 own set of facts and circumstances. We came to an
22 agreement and understanding in reliance that SoCalGas
23 on the record at the pre-hearing conference wanted
24 SED to produce violations right away, and that we
25 would have the ability to brief the violations. We

1 didn't have to do that, SED didn't have to produce
2 violations.

3 There is no telling had we not come to this
4 resolution what the ALJ would have instructed. But
5 we've done so, and we are concerned that SoCalGas
6 frankly is not in good faith in asking these
7 questions at this time and asking for the basis for
8 legal conclusion.

9 So with that, that's our response. That
10 remains our position. It's not appropriate to be
11 asking Ms. Felts these types of questions here.

12 But with that, you can continue with your
13 line of questioning.

14 MR. STODDARD: I'd like to make a couple of
15 other remarks for the record.

16 Frankly, I don't understand your point about
17 Jason Egan, but we can move on from that.

18 Secondly, I don't know that it would be
19 necessary to be asking Ms. Felts these questions if
20 SED responded to our written discovery along the same
21 lines, where we've asked you to explain legal basis
22 and positions which SED should be capable of doing if
23 it doesn't want to subject its witness to those
24 questions.

25 One of the reasons for asking questions

1 related to legal basis or contentions or anything
2 else is to help narrow the parties -- the scope of
3 issues in dispute and bring the parties together for
4 purposes of determining the issues that actually
5 should be litigated in an evidentiary hearing.

6 Everything in here that has been alleged
7 related to the Boots & Coats violation, is simply
8 related to SED's misunderstanding of the law. And we
9 are trying to ask questions about that so we can
10 better understand what your position is.

11 MR. GRUEN: I'm going to object to that
12 characterization as mischaracterizing SED's
13 testimony. That's just simply an inappropriate
14 mischaracterization.

15 I'm sorry if you don't understand our point
16 about Mr. Egan, we can go back on the record and
17 understand it. I don't know how to articulate it any
18 better, Jack. I'm sorry that it has to come to this.

19 But we're here. If you want to continue to
20 ask questions, we --

21 Again, we don't think this is appropriate to
22 continue down the road of asking about legal
23 conclusion, but if you're going to do it for purposes
24 of the deposition, then continue with your line.

25 MR. STODDARD: I hadn't finished what I was

1 saying, but I will continue my line of questioning in
2 a moment.

3 The next --

4 The only other thing I wanted to mention,
5 just in case it was unclear, was we aren't conceding
6 anything with respect to cross-examination. I was
7 simply noting that this is not a cross-examination.

8 Again, our reading of what occurred -- you
9 know, our reading of ALJ Amy Yip-Kikugawa's ruling at
10 the San Bruno case we think is applicable here. We
11 don't think that the judge relied on that discussion
12 for purposes of the scoping ruling. And if we have
13 to go to the judge over this, we can.

14 MR. GRUEN: We're agreeing to answer questions.

15 I would say it's also a mischaracterization
16 to call Amy Yip-Kikugawa my co-counsel. She is an
17 Assistant General Counsel at -- and she is my direct
18 supervisor. She is not an assigned counsel to this
19 proceeding.

20 Just to make it clear, that's Nicholas and
21 myself. We're the designated counsel of record, just
22 to clarify.

23 And the ruling there has, to my -- and you
24 can enlighten me, there has been no ruling saying
25 that Ms. Felts has to answer questions regarding

1 legal conclusions, that call for legal conclusion.
2 But if you want to take that to the judge, we
3 understand, and we can handle the issue that way.

4 Like I said, she is available to answer
5 questions at this point.

6 MR. STODDARD: Okay.

7 Q Turning to page 54, Ms. Felts.

8 A Okay. I'll get it later.

9 MR. GRUEN: Okay.

10 BY MR. STODDARD:

11 Q This alleges four violations related to
12 alleged data dumps of documents on Blade.

13 A Yes.

14 Q Did you review the contents of these data
15 dumps?

16 A I have reviewed some of it, but I have not
17 reviewed the actual files that Blade received. I
18 believe I have reviewed some of the documents that
19 were in possession of the PUC that were similar.

20 Q And you didn't interview Blade regarding the
21 context of the data dumps, did you?

22 A No.

23 Q Did you review any correspondence between
24 SoCalGas and SED on this issue, including data
25 responses?

1 A On this issue?

2 Q Yes.

3 A What data response would it be, could you
4 tell me?

5 Q We can follow up with that.

6 But do you recall as you sit here, reviewing
7 a response to a data dump?

8 A I think I did review some things, but I
9 can't tell you what data response it was in or what
10 the extent of the documentation was.

11 Q Okay. For purposes of the record, it looks
12 like I didn't actually get an answer to my question
13 prior to the exchange with Mr. Gruen; so I'm going to
14 ask it again, and we can just get it on the record.

15 Are you aware of any authority that would
16 permit SoCalGas to compel production of a third-party
17 entity?

18 MR. GRUEN: And re-note the objection as calling
19 for legal conclusion.

20 THE WITNESS: No.

21 MR. STODDARD: Thank you.

22 Q With respect to the Blade data dump we were
23 just discussing, you indicated you may have reviewed
24 some of the documents?

25 A Yes.

1 Q Did you assess materiality of the documents
2 to Blade's RCR report?

3 A I don't know what that means.

4 Q Did you consider whether or not the
5 documents had bearing on any of the issues that Blade
6 reached conclusions on in their Blade -- in the Blade
7 report?

8 A I think I answered that question when I
9 discussed the apparent lack of temperature surveys or
10 their -- the fact that they appeared not to have them
11 until review for Well SS-25. Other than that --

12 And they said they didn't have permeability
13 of the reservoir, which wasn't in the Well 25 --
14 SS-25 file anyway. I would say that most of their
15 conclusions were based on their own work with the
16 well and their own investigation into the well
17 casings, their groundwater monitoring wells.

18 So they developed most of their own -- their
19 own information. It's possible that had they had the
20 time to look at all of the data that SoCalGas
21 provided them, they might have had additional
22 information to inform them on more details of the
23 case. I just don't know.

24 Q Thank you.

25 When did you review the data doc -- data

1 dump documents that you reviewed?

2 A I didn't -- I didn't review anything other
3 than that one well file prior to filing the
4 testimony.

5 Is that what you mean? I mean, you're
6 talking about SoCalGas records?

7 Q Yes.

8 A Yes.

9 Q Ms. Felts, circling back to the privilege
10 violations, and if we don't -- if we have to
11 reference the testimony, we can. But we can speak
12 without a document if we're able to.

13 You're aware that each alleged privilege
14 violation is framed as both a violation of 451 and
15 1.1, correct?

16 A Yes.

17 Q Can you explain why in your view each
18 privilege violation is -- constitutes a violation of
19 Public Utilities Code 451?

20 MR. GRUEN: Objection. Calls for legal
21 conclusion.

22 Can we go off the record for a second?

23 MR. STODDARD: You've stated your objections,
24 Darryl.

25 MR. GRUEN: I know.

1 MR. STODDARD: Are you going to let us ask her a
2 question?

3 MR. GRUEN: Absolutely.

4 We have --

5 MR. STODDARD: We can go off the record.

6 MR. MOSHFEGH: There is a question pending.

7 THE VIDEOGRAPHER: Just a moment.

8 MR. GRUEN: Okay. We can wait until the
9 question is done.

10 THE VIDEOGRAPHER: Go ahead.

11 THE WITNESS: Okay. 451 is related to safety,
12 so a duty to operate safely. Is that --

13 Do you want more?

14 BY MR. STODDARD:

15 Q So did you determine that the documents here
16 that were withheld jeopardized safety?

17 A The concept was that you -- the delay in
18 getting the documents created an unsafe situation
19 because there was no way to respond to the documents
20 without -- or to use the documents unless they were
21 provided.

22 Q Would it be relevant to your opinion on
23 these violations if --

24 I asked earlier several if several of the
25 documents were duplicates, as you'll recall.

1 Would it be relevant to your opinion on
2 these violations if many of these documents were
3 already in SED's possession?

4 A I -- I have to wonder why we don't have
5 them, what the purpose of not disclosing them is. If
6 we already have them, why couldn't you just tell us
7 we already have them.

8 Q For example, attachments to emails that
9 would have been otherwise privileged, attachments to
10 privileged documents are privileged, but they're
11 included for purposes of the calculation of
12 penalties.

13 A Is that how they ended up being pages?

14 Q Is that relevant in your view to the
15 assessment of a violation in this instance?

16 A I think it's probably relevant. You have to
17 have all of the information in order to count.

18 MR. GRUEN: If you finished that line, can we go
19 off the record now for a moment?

20 BY MR. STODDARD:

21 Q Do you know what, if anything, SED would
22 have done differently had it received these documents
23 earlier?

24 A You might not have that violation.

25 Q Do you know what, if anything, SED would

1 have done differently with respect to their
2 investigation?

3 A Not without knowing what the -- what the
4 records are.

5 Q The records that were produced to you, which
6 are in your possession, these are the documents that
7 the privilege violations are based upon.

8 A Oh, and that have now been produced?

9 Q Yes.

10 A Without looking at each one of the
11 documents, I can't tell you what --

12 I was never asked to look at them in that
13 manner.

14 Q Are you aware if any of the documents are
15 relied upon in your testimony in any citation or
16 exhibit for purposes of supporting other alleged
17 violations?

18 A I don't know. But I don't think so.

19 MR. STODDARD: Okay. Thank you. We can go off
20 the record.

21 THE VIDEOGRAPHER: We are off the record at
22 7:42 p.m.

23 (Off the record.)

24 THE VIDEOGRAPHER: We are back on the record at
25 8:06 p.m.

1 MR. STODDARD: All right, Ms. Felts, I'm going
2 to promise to keep this short hopefully. But we'll
3 be jumping around a bit just because this is kind of
4 the scraps at the end, so bear with me.

5 Q To begin with, I'm going to ask, do you
6 consider yourself, Ms. Felts, an expert on
7 attorney-client privilege?

8 A No.

9 Q Are you aware of any hard drive of Blade
10 data that was produced to SED?

11 A Yes.

12 Q And have you accessed that?

13 A No.

14 Q So you haven't reviewed any of the records
15 that are on that drive?

16 A Not yet.

17 MR. STODDARD: Okay. I'm going to introduce
18 Exhibit 1-33.

19 (Deposition Exhibit 1-33 was
20 marked for identification and is
21 attached hereto.)

22 BY MR. STODDARD:

23 Q Do you recognize this document, Ms. Felts?

24 A Yeah, it looks like something I wrote.

25 Q This is an email from you --

1 Well, to be clear this includes two emails:
2 The top one is from you to Karen Shea and Darryl
3 Gruen, and it includes an attachment "Draft Data
4 Request"; is that correct?

5 A Yes. Well, that's what it looks like.

6 Q And the bottom email is also from you to
7 Karen Shea, and it appears to be related to the draft
8 data request as well?

9 A Yes.

10 Q Turning the page, in referencing the
11 attached data request, and again, this is just for
12 purposes of the record, Exhibit 1-33, the email dated
13 November 8, 2019, and the draft data request, the
14 first data request is for -- it asks to provide a
15 summary of all data requests that SoCalGas has
16 received related to I1906016, including those
17 received from the CPUC before and after the
18 initiation of investigation from DOGGR Blade and
19 third parties; is that correct?

20 A Yes.

21 Q Did you prepare that request?

22 A Yes.

23 Q Why did you prepare that request?

24 A At the time I understood that the data that
25 was available at the PUC was incomplete, an

1 incomplete set, and it was also not readily
2 accessible to me. And so there was some discussion
3 back and forth about how to get a full set of data.

4 Q And was it not --

5 Was it incomplete and not accessible in
6 part because of the corrupted files you referenced
7 earlier?

8 A That's part of the issue. Things wouldn't
9 open. Other issues were there was some thought that
10 some of the data that had been provided by SoCalGas
11 in thumb drives may not have been uploaded. I don't
12 think that was the case.

13 But at the time -- at the time when I
14 couldn't find it on the Diamond database, that was
15 mentioned that they thought maybe, maybe they weren't
16 uploaded.

17 Later I found out that it was just organized
18 a different way, and I was able to find some of it.
19 Did not solve the corrupted files problem.

20 Q Was any of the data lost, to your knowledge?

21 A What do you mean by "lost"? Like did they
22 lose a thumb drive?

23 Q Or was it, you know, simply not in SED's
24 possession despite the fact that it appeared it had
25 been transmitted to SED?

1 A I can't really tell you that. I don't have
2 a good feel for what came in, what should have been
3 uploaded and what should not have. I just don't have
4 a good solid sense of what all SoCalGas provided.
5 And I wanted to get it directly from SoCalGas again,
6 but apparently you said no; so then we took steps to
7 try to get a set of data from -- directly from Blade,
8 and that was difficult too.

9 Q In the course of preparing this request, I
10 imagine you had conversations with Ms. Shea and
11 Mr. Gruen about the need to ask it?

12 A Yes.

13 Q Including discussions about how you could
14 access the data, correct?

15 A Yes.

16 Q And where it was?

17 A Yes.

18 Q In the course of those discussions, did
19 anyone indicate that the data had been lost?

20 A There was a thought that -- not that it had
21 been lost but that maybe it was not uploaded. There
22 was also a comment that the thumb drives had been
23 uploaded and then discarded. Because we thought
24 maybe if we could get the thumb drives, I could look
25 at it directly from those. But I have not been

1 provided any thumb drives.

2 Q Why couldn't you --

3 If it had been uploaded from the thumb
4 drives, why couldn't you look at the data that was
5 uploaded?

6 A Well, because the files weren't opening.
7 And a lot of the larger files were opening with the
8 message that said the file was corrupted; so there
9 wasn't any way for me to recover it.

10 Q Do you recall from those discussions any
11 reference to FTP transfers?

12 A We talked about this earlier. I had --
13 I got capability to do FTP out, but there
14 was no discussion about --

15 Q I'm sorry, I'm asking a different question.

16 A Okay.

17 Q We did talk about it earlier, correct?

18 A Yes.

19 Q I'm asking whether --

20 You mentioned that SED had received files
21 from SoCalGas via thumb drive?

22 A Yes.

23 Q Are you aware whether SED also received
24 files from SoCalGas via FTP?

25 A No.

1 Q Okay. So you don't recall any discussion
2 about expired FTP transmittals?

3 A I think somebody --

4 Actually, I think I received a link maybe
5 from Karen or Darryl that had expired. I tried the
6 link.

7 Q Thank you.

8 Ms. Felts, we were discussing casing
9 inspection logs earlier.

10 Do you have any personal experience with the
11 Vertilog tool?

12 A Other than just reading logs? No.

13 You mean like running a wire line test or --
14 and generating one?

15 No.

16 Q How about interpreting logs --

17 A Yes.

18 Q -- Vertilogs specifically?

19 A I have read those, yes.

20 Q And in what context?

21 A Well, beginning in school I had a whole
22 course on that, and then over a period of time I have
23 had occasion in private consulting cases to look at
24 well logs.

25 Q Again, we're talking specifically about

1 Vertilog logs here.

2 A Well, I think a Vertilog is one of many
3 different kinds of logs; so I'm sure I've looked at
4 them. I just can't tell you exactly which case, what
5 date.

6 Q And what is your understanding regarding the
7 reliability of Vertilogs -- the Vertilog tool?

8 A There were probably some issues with them
9 over time. They've probably gotten a lot better
10 recently.

11 Q Okay.

12 MR. STODDARD: Introduce Exhibit 1-34.

13 (Deposition Exhibit 1-34 was
14 marked for identification and is
15 attached hereto.)

16 BY MR. STODDARD:

17 Q In connection with Exhibits 1-17 and 1-18.
18 Ms. Felts, do you recognize this?

19 A No.

20 Q This is the metadata file for an email for
21 the document attached to the Tuesday, November 19th,
22 email from Darryl to you, if you reference
23 Exhibit 1-17 and Exhibit 1-18.

24 A 1-17 and 1-18?

25 Q Correct.

1 Do you have 1-18 there?

2 A I have 1-18.

3 Is that good enough?

4 Q That's good enough.

5 A Okay.

6 Q This is the metadata file for document 1-18,
7 which is the draft testimony that was transmitted to
8 you by Darryl Gruen, and this is SED's portion of the
9 testimony.

10 A Okay.

11 Q And you'll see there that identifies the
12 manager author as Randy Holter.

13 A Uh-huh.

14 Q And you don't know and haven't spoken to
15 Randy Holter, correct?

16 A No.

17 Q And the secondary author it identifies, last
18 modified -- the document was last modified by Darryl
19 Gruen.

20 Do you see that?

21 A Yes.

22 Q And it doesn't identify any other authors?

23 A Okay.

24 Q Do you see that?

25 A Uh-huh.

1 Q Ms. Felts, seeing this and having gone
2 through the preparation of your testimony in the
3 period of time between the engagement and the service
4 of your testimony, do you think it would make more
5 sense for Mr. Holter to be the testifying witness on
6 some of these issues than you?

7 A I have no idea. I don't know what his
8 expertise is. And I don't know that he actually
9 wrote the testimony. He could have just opened the
10 file on 10-19 or 11-19 or whenever it was created. I
11 guess it was created sometime around 9-23 maybe.

12 Q And --

13 A Hard to tell.

14 Q And if he just opened the document, then
15 that would mean Mr. Gruen drafted the testimony based
16 on this metadata; is that correct?

17 A No, not --

18 I mean, metadata, this only goes to this
19 electronic file; so the file could be saved as
20 another document, as a new document. You could start
21 over.

22 I don't -- I don't know that you can really
23 glean a whole lot by this particular metadata.

24 Q Ms. Felts, with respect to your portion of
25 the testimony, which is related to the recordkeeping

1 violations --

2 MR. GRUEN: Objection. That's a
3 mischaracterization of testimony.

4 She has identified that she is sponsoring
5 the whole -- the entirety of the testimony, not just
6 recordkeeping.

7 MR. STODDARD: I'm sorry, let me correct that.

8 Q With respect to the portion of the testimony
9 that you wrote, which relates to the recordkeeping
10 violations, Ms. Felts, what is your experience with
11 recordkeeping practices at gas storage fields?

12 A Only that I reviewed records for the
13 Playa del Rey and the Montebello cases.

14 Q So you haven't looked at recordkeeping
15 practices at other gas storage fields?

16 A No. I only looked at the recordkeeping
17 entries in the PG&E records retention documents. I
18 think I provide those to you in response to a data
19 request.

20 Q And aside from that, nothing else?

21 A No.

22 MR. STODDARD: Okay. I think that's it.

23 THE WITNESS: Do you want to redirect?

24 MR. GRUEN: I just want to be sure.

25 MR. STODDARD: Apologies.

1 One more document.

2 MR. GRUEN: Okay.

3 (Deposition Exhibit 1-35 was
4 marked for identification and is
5 attached hereto.)

6 MR. STODDARD: Mark this as Exhibit 1-35.

7 Q Ms. Felts, do you recognize this document?

8 A I don't think I've seen this document.

9 Q You did indicate that you accessed the
10 Commission's Aliso Canyon Web page, correct, but you
11 had trouble downloading a Blade report from there, I
12 think?

13 A Yes.

14 Q Do you see down about three-quarters of the
15 way down the page --

16 A Okay.

17 Q -- where it says "Both the Division," I
18 guess at the bottom, both "The Division and the PUC
19 have directed the Gas Company to hire an independent
20 third party to perform a technical root cause
21 analysis of the well failure"?

22 A Yes.

23 Q Is it your understanding from your review
24 that Blade's investigation has been fully
25 independent?

1 A Yes.

2 Q Turning to Appendix B, do you see on page 1
3 the "Findings and Timeline"?

4 A Yes.

5 Q Do you see there in the first sentence of
6 last paragraph where it states "SED will release its
7 official investigation report upon completion of all
8 aspects of its investigation"?

9 A Yes.

10 Q And to confirm, you're not aware of any such
11 official investigation report; is that correct?

12 A Wasn't -- doesn't --

13 Isn't that related to the Blade report?

14 Q This is SED's report.

15 A Okay. I guess I misread that.

16 Q Are you aware of an SED official
17 investigation report?

18 A No.

19 Q Okay.

20 MR. GRUEN: I just note a foundation objection
21 for the record.

22 She has noted that she hasn't seen this
23 document before, she doesn't recognize it.

24 But the questions are noted.

25 MR. STODDARD: All right. That's it.

1 MR. GRUEN: Okay.

2 MR. STODDARD: Go off the record?

3 MR. GRUEN: Yeah.

4 MR. STODDARD: Do you have any other comments?

5 MR. GRUEN: Yeah. I'll wait until we're off.

6 THE VIDEOGRAPHER: We are off the record at

7 8:27 p.m.

8 (Off the record.)

9 THE VIDEOGRAPHER: We are back on the record at

10 8:31 p.m.

11 MR. GRUEN: While we were off the record,
12 SoCalGas and SED agreed that Ms. Felts can offer a
13 clarification statement for her earlier testimony
14 today. And if so SoCalGas wants to ask follow-up
15 questions on that statement, SED has no objection.

16 Go ahead.

17 THE WITNESS: Okay. Do you want me to just say
18 what it is?

19 MR. GRUEN: Yeah.

20 THE WITNESS: That one?

21 MR. GRUEN: Yeah.

22 THE WITNESS: Well, so you asked me about my
23 contractor license earlier, and I looked it up, and
24 it is called -- in California it's called an a
25 general engineering contractor license.

1 So when I said general engineering license,
2 I think maybe I misspoke and didn't add the
3 "contractor" on. But somehow it was misunderstood.
4 I just wanted to clarify that.

5 I have put that on inactive, and apparently
6 in the last couple of years privacy must have gotten
7 to the contractor -- the state license board because
8 you can no longer look it up under my name if it's
9 inactive; So some old -- an old license number when I
10 was incorporated comes up under Invictus as not --
11 not inactive, but it's actually a dead license.

12 The current one that is inactive, I would
13 have to provide you the license number, and I don't
14 have it with me. But I could do that if you want it.
15 And then I think it will come up maybe.

16 MR. STODDARD: Okay.

17 THE WITNESS: But I think I could get those
18 records if you needed them.

19 MR. STODDARD: Yes, we would appreciate that.

20 Well, actually let me ask one quick
21 question.

22 Q What is the purpose of the general
23 engineering contractor's license?

24 A It's basically the top tier of general
25 contractors license. It basically gives me license

1 in California to do any kind of construction on
2 contracts.

3 Q And to subcontract?

4 A And subcontract. So a general --

5 Like if you go hire a general contractor to
6 build a building, that would be me. Then I
7 subcontract all of the work out and handle all of the
8 permits and oversight; so it is a major category.
9 It's the category if you want to be into
10 construction.

11 I acquired it early on to be able to drill
12 wells for groundwater monitoring and to be able to do
13 hazardous waste cleanup. I did have to take an
14 additional exam for the hazardous part of it; so mine
15 says "A General Engineering Contractor-HAZ," which
16 means I'm allowed to manage site cleanups where there
17 is hazardous waste.

18 Q Okay. Yes, I think we would like to see
19 copies of that --

20 A Okay.

21 Q -- license.

22 And just to reiterate, because I was
23 confused about this earlier, but -- and I want to
24 make sure I have it clear, and I apologize if I
25 already asked this question.

1 Do you have any other engineering-related
2 licenses or certifications or credentials?

3 MR. GRUEN: That she hasn't already identified
4 in the course of the deposition today?

5 MR. STODDARD: Well, I just want to be clear
6 that we're not --

7 I might be confused.

8 For sake of the record, we now have
9 established and I understand the general engineering
10 contractor's license.

11 Q Are there any others?

12 A No.

13 MR. STODDARD: Okay.

14 MR. MOSHFEGH: Confirm for one --

15 MR. STODDARD: Sure.

16 I don't think we necessarily need to. I --
17 Housekeeping item for purposes of the
18 record.

19 We've noted that you've objected today to
20 questions related to Ms. Felts' work since the
21 service of opening testimony?

22 MR. GRUEN: Right.

23 MR. STODDARD: We don't -- we don't have those
24 documents. Sounds like there might be additional
25 work product being generated at this time; we don't

1 have access to that.

2 We are going to see her live testimony at
3 some point in time, which presumably will be based on
4 that work product and given that that's basis of the
5 objection, so, procedurally, we would like to keep
6 the deposition open, and the request for work papers
7 in particular open so that after the next round of
8 testimony is served, you would then produce to us any
9 additional work papers.

10 MR. GRUEN: I think it's appropriate for a
11 second -- if you want to produce --

12 If you want a deposition that is based on,
13 then it's appropriate to do a new round.

14 This was understood to be a notice of
15 deposition related to opening testimony. You know,
16 you're entitled to propound discovery.

17 MR. STODDARD: We can notice a new deposition
18 with the understanding that this is -- you know, it
19 would be based on that objection, essentially.

20 MR. GRUEN: Yeah. And, you know, we'll bear it
21 in mind.

22 But I will say, Jack, we're -- the timelines
23 grow tighter. We're noting that the reply testimony
24 is due February 21st, rebuttal is the 27th of March.
25 The ability for us, with our limited bandwidth, to

1 juggle that additional deposition time with the
2 ability to prepare testimony and do discovery is
3 getting harder; so we just ask that you bear that in
4 mind.

5 But we understand the request and if you
6 want to request the -- we anticipate that you may
7 want to request the work papers associated with
8 future testimony as well. And we'll bear that in
9 mind and work to cooperate on that discovery along
10 those lines.

11 MR. STODDARD: Yeah.

12 Just to be clear, we wouldn't be requesting
13 a deposition prior to your service of testimony --

14 MR. GRUEN: Understood. We appreciate that.
15 Yeah. Okay.

16 MR. STODDARD: -- unless we get new information
17 related to her testimony that wasn't produced today
18 that you produce at a later date that is relevant
19 to -- right, with that one caveat in mind.

20 But assuming when we're talking about the
21 work papers for purposes of the reply testimony, our
22 reservation for an additional deposition would be
23 after the service of the reply testimony.

24 MR. GRUEN: And we have the same concern with
25 rebuttal, of course, that immediately before rebuttal

1 testimony, we'll be busy in preparing that as well,
2 the March 27th testimony.

3 MR. STODDARD: Right.

4 MR. GRUEN: Okay. Sounds like we can work that
5 out okay.

6 MR. STODDARD: Anything further?

7 MR. GRUEN: Nothing further from SED.

8 Thank you.

9 THE VIDEOGRAPHER: This is the end of our
10 deposition, the end of disk number five, Volume
11 number 1, of the deposition of Margaret Felts on
12 February 5th of the year 2020.

13 We are off the record at 8:39 p.m.

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REPORTER'S DEPOSITION TIME LOG:

REPORTER - LINDA SILVER RYAN

DATE - Wednesday, February 5, 2020, 2019

WITNESS - MARGARET FELTS

| ATTORNEY | ON RECORD | OFF RECORD | TOTAL |
|----------|------------|-------------|-------|
| STODDARD | 9:23 A.M. | 10:55 A.M. | 1:32 |
| | 11:13 A.M. | 12:15 P.M. | 1:02 |
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| | 2:47 P.M. | 3:39 P.M. | 0:52 |
| | 3:44 P.M. | 3:52 P.M. | 0:08 |
| | 4:25 P.M. | 5:59 P.M. | 1:34 |
| | 6:22 P.M. | 7:42 P.M. | 6:03 |
| | 8:06 P.M. | 8:27 P.M. | 0:21 |
| | 8:31 P.M. | 8:39 P.M. | 0:08 |
| | | TOTAL USED: | 9:04 |

1 CHANGES AND SIGNATURE

2 WITNESS: MARGARET FELTS

3 DATE OF DEPOSITION: Wednesday, February 5, 2020

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5 PAGE LINE CHANGE REASON

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STATE OF _____)
) Ss.
COUNTY OF _____)

I, the undersigned, say that I have read the foregoing deposition, and I declare, under penalty of perjury under the laws of the State of _____, that the foregoing is a true and correct transcript of my testimony contained therein, incorporating any and all changes and/or corrections as heretofore noted by me, and the reasons for same.

EXECUTED this _____ day of _____, 2020, at _____.

MARGARET FELTS

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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 placed under oath;

That a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction;

That the foregoing deposition is a full, true and correct transcript of my shorthand notes so taken and transcribed;

That any dismantling of this transcript will void my certification as a Certified Shorthand Reporter;

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

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IN WITNESS WHEREOF, I have this date
subscribed my name.

Dated: _____

LINDA SILVER RYAN
CSR No. 9915

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