

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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ADMINISTRATIVE LAW JUDGES JESSICA T. HECHT and MARCELO
POIRIER, co-presiding

Order Instituting Investigation on)	EVIDENTIARY
the Commission's Own Motion into the)	HEARING
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)	Investigation
Uncontrolled Release of Natural Gas)	19-06-016
from its Aliso Canyon Storage)	
Facility. (U904G))	

REPORTERS' TRANSCRIPT
Virtual Proceeding
May 5, 2021
Pages 2033 - 2173
Volume 15

Reported by: Carol Ann Mendez, CSR No. 4330
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I N D E X

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VIRTUAL PROCEEDING

MAY 5, 2021 - 10:00 A.M.

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DAN NEVILLE,

resumed the stand and testified further as follows:

ADMINISTRATIVE LAW JUDGE ALJ POIRIER:

We'll be on the record. Good morning. This is ALJ Marcelo Poirier.

This is the evidentiary hearings in I.19-06-016, the Aliso Canyon Investigation. It's May 5th, 2021. Happy Cinco de Mayo, everybody.

We had -- when we left off yesterday, there were going to be some meet and confer with the parties and it sounds like we have some news on that. So, Mr. Gruen, why don't you go ahead and take that away.

MR. GRUEN: Thank you, your Honor.

I do, indeed, have an update based on the communications of SoCalGas' Public Advocates and Safety and Enforcement Division regarding the hearing matters that were left unresolved yesterday.

After providing an update, I would request that SoCalGas' counsel confirm my

1 understanding of SoCalGas' position on these
2 statements. So this is to confirm that I
3 have it. I have stated it accurately.

4 First, SoCalGas has confirmed that
5 Exhibit 274 was produced to SED in response
6 to SED Data Request 17. And for
7 clarification, this is the document with the
8 handwritten notes that Mr. Neville did not
9 recognize yesterday.

10 My understanding from SoCalGas is
11 that it has confirmed that those handwritten
12 notes appear on the version of the document
13 that it produced to SED.

14 Second, SoCalGas has confirmed that
15 Exhibit SED-275 entitled, quote, "History of
16 Oil or Gas Well SS-25 dated 2/26/2016," end
17 quote, is a document that was produced to
18 DOGGR and SED.

19 While I understand that SoCalGas has
20 validated the authenticity of these documents
21 as SoCalGas initially provided them, I also
22 understand that SoCalGas has instructed that
23 SED lay a foundation for questioning for
24 these documents to the extent that we use
25 them.

26 Third, with regards to Exhibits 276
27 -- excuse me, SED-276 and SED-278, the
28 respective shorthand titles of these

1 documents is the Core Lab Report dated
2 November 12, 2015, and the SoCalGas Response
3 to SED Data Request 89.

4 SoCalGas has informed us that it
5 will not stipulate to the admission of these
6 exhibits. I also understand SoCalGas'
7 statement that provided that our questions
8 concerning these exhibits related to the leak
9 response, and depending on what the specific
10 questions are, Mr. Schwecke would be the
11 appropriate witness for these exhibits.

12 That's the conclusion of the update
13 that I have, your Honor.

14 ALJ POIRIER: Thank you. Does SoCalGas
15 have anything to add?

16 MR. STODDARD: Yes, your Honor. Thank
17 you.

18 Mr. Gruen accurately captured our
19 communications on this issue. One note,
20 however, Mr. Gruen read a date for SED-275,
21 the date of the document. I am not sure it
22 was the correct date. I don't know that it
23 matters as long as we get it correct at the
24 time that it's utilized in the course of
25 cross-examination, but I do just want to note
26 that for purposes of record. I don't believe
27 the date Mr. Gruen referenced, although I am
28 not certain, was the date of production, not

1 the date the document was created, but we can
2 deal with that at the time that it's entered,
3 if that's all right with SED.

4 ALJ POIRIER: That sounds good.

5 MR. GRUEN: No objection -- I'm sorry.
6 Go ahead, your Honor. Sorry for
7 interrupting.

8 ALJ POIRIER: That sounds good. And I
9 see Mr. Gruen nodding, so I think we can move
10 ahead from there. Thank you.

11 With that, any other preliminary
12 matters?

13 (No response.)

14 ALJ POIRIER: Okay. Do we have
15 Mr. Neville?

16 MR. LOTTERMAN: We should. Let me go
17 find him.

18 ALJ POIRIER: Let's go off the record.

19 (Off the record.)

20 ALJ POIRIER: Okay. We'll be back on
21 the record.

22 We were just getting set for
23 continuing with cross-examination and we will
24 continue with the examination of Witness
25 Neville by Mr. Gruen of SED.

26 Please go ahead, Mr. Gruen.

27 MR. GRUEN: Thank you, your Honor.

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CROSS-EXAMINATION RESUMED

BY MR. GRUEN:

Q Mr. Neville, do you recall yesterday we broached the topic of some documentation to check to see if SoCalGas provided a complete set of leaks at Aliso, in response to SED's request for that information? Do you recall that set of questions towards the end of the day?

A Yes.

Q Okay. So, and we can go back if need be, but just for refreshing recollection purposes, my understanding of your witness qualifications is that beginning November 2015, you also began providing assistance concerning various tasks related to the October 23, 2015 leak at SS-25; is that correct?

A Yes.

Q Okay. So, if I could ask you now some questions about a suspected hole near the top of the SS-25 casing in 2012, and with that if I could introduce Exhibit SED-274. And for the record, this is -- the title page of this document is SED-274 Estimated Well Conditions as of 11/10/15.

And if we scroll to the next page, this is the document that we were discussing

1 with the handwriting that had the handwriting
2 that you didn't recognize yesterday.

3 So, as I understand it, and correct
4 me if I'm wrong, Mr. Neville, SoCalGas did
5 produce this document to SED with the
6 handwritten notes as they appeared as you see
7 here; is that correct?

8 A I don't honestly -- I'm not able to
9 answer that question.

10 Q All right. Understood. Let me
11 just ask this. I will try to lay a
12 foundation.

13 Do you recognize this as part of
14 SoCalGas Data Response to SED Data Request
15 17?

16 A Yes. That was the title that you
17 showed me just in the previous slide.

18 Q Do you recognize the document,
19 Mr. Neville?

20 A I recognize it from yesterday, from
21 seeing it yesterday.

22 Q Are you able to answer questions
23 about this document, Mr. Neville?

24 A I am able to answer questions. I
25 just didn't know what data request number it
26 was associated with. I will take your word
27 that it was associated with that particular
28 number.

1 Q Understood. I'm sorry for
2 interrupting. Go ahead.

3 A Yes, I am able to answer questions
4 on that document -- this document.

5 Q Okay. Mr. Neville, as a matter of
6 practice, does SoCalGas allow non-SoCalGas
7 personnel to handwrite notes on SoCalGas
8 documents?

9 A Is it allowed? It's --
10 non-SoCalGas personnel, to the extent they
11 have one of our diagrams or, you know,
12 they're allowed to write on those diagrams.
13 There's nothing that we have in place that
14 prevents them from writing on our diagrams.

15 Q As a matter of practice, does
16 SoCalGas produce its own documents with the
17 handwriting of non-SoCalGas personnel when
18 there are data requests for such documents?

19 MR. LOTTERMAN: Objection. Calls for
20 speculation.

21 MR. GRUEN: I can rephrase that.

22 Q To the best of your knowledge, as a
23 matter of practice, Mr. Neville, does
24 SoCalGas by data responses allow that --
25 provide the handwritten notes of SoCalGas
26 personnel on SoCalGas documents?

27 A I guess it would depend on the
28 question in the data request. I wouldn't

1 know. Perhaps -- I just don't know what the
2 question -- what the data request was and to
3 be able to answer that question.

4 Q To the best of your knowledge, is
5 it SoCalGas practice to not know who has
6 added handwritten notes to its types of
7 records like this one?

8 A I wouldn't call it a practice. I
9 have no idea where this handwritten diagram
10 came from. So it's hard to speculate how it
11 got to the point of being produced. And I'm
12 sorry. Could you repeat the question?

13 Q Is it SoCalGas practice to not know
14 who has added handwritten notes to its types
15 of records like the one you see here?

16 MR. LOTTERMAN: I'm sorry. To his
17 knowledge, Mr. Gruen?

18 MR. GRUEN: Yes. I appreciate the
19 clarification. Why don't I restate. Thank
20 you, Mr. Lotterman.

21 BY MR. GRUEN:

22 Q To the best of your knowledge and
23 understanding, Mr. Neville, is it SoCalGas
24 practice to not know who adds handwritten
25 notes to its types of records like the one
26 you see here on the screen share?

27 A To the best of my knowledge, no,
28 not added to -- not added to the record.

1 Q So to the best your knowledge and
2 belief, are the handwritten notes on this
3 document written by personnel from SoCalGas?

4 A I don't know.

5 Q Okay. Let's go to the top of the
6 document. And it says there Estimated Well
7 Conditions as of 11/10/15. Do you see that?

8 A Yes.

9 Q And since you don't know about the
10 handwritten documents, I have to ask you,
11 since that's in handwriting, do you have any
12 reason to doubt the veracity of that written
13 -- handwritten portion on the document?

14 A What do you mean by "veracity" if
15 you can maybe be --

16 Q Sure. Do you have any reason to
17 doubt the accuracy of that handwritten
18 portion of the document?

19 A I guess I don't have -- I don't
20 think I'm able to make a good judgment as to
21 its accuracy because I don't know who wrote
22 it, you know, what data they were looking at.
23 It would be really difficult for me to even
24 have an opinion on its accuracy.]

25 MR. GRUEN: Your Honor, I think what we
26 may ask here is if SoCalGas can produce
27 someone who can speak to the accuracy of
28 these handwritten notes --

1 MR. LOTTERMAN: Your Honor?

2 MR. GRUEN: -- we can -- I'm sorry. Go
3 ahead.

4 MR. LOTTERMAN: Your Honor, let me take
5 up that request on a break and see what we
6 come up with.

7 ALJ POIRIER: Thank you.

8 Mr. Gruen, would that be okay if
9 we -- can you go to another line or do you
10 have more questions on this?

11 MR. GRUEN: No objections, your Honor.
12 Maybe just to finish the portion of this line
13 that I think is doable without the
14 handwritten notes, if that would work, and
15 then we can revisit once we hear back from
16 Mr. Lotterman.

17 Would that work, your Honor?

18 ALJ POIRIER: That does. Please
19 continue.

20 MR. GRUEN: Thank you.

21 Q Okay. So maybe just with regards
22 to the nonhandwritten information on this
23 document, do you recognize the information on
24 this document, the rest of the information is
25 accurate?

26 A Yes.

27 Q Okay. Thank you. Let's say
28 hypothetically -- I know you don't recognize

1 it -- but let's say that the -- you see where
2 it says toward the middle the suspected hole
3 at approximately 500 feet in 7-inch?

4 Do you see that?

5 MR. LOTTERMAN: Your Honor, I hate to
6 interrupt here, but I'm not sure Mr. Gruen
7 should be doing this. He's asking a witness
8 who has no firsthand knowledge about the
9 handwritten notes to hypothetically interpret
10 them. I think that also calls for
11 speculation, and I would request that any
12 questions about the handwritten notes be
13 prevented at this time.

14 ALJ POIRIER: Are you saying that we
15 wait until we have an answer on who can talk
16 about these handwritten notes?

17 MR. LOTTERMAN: All I'm saying, your
18 Honor, is it's not Mr. Neville.

19 MR. GRUEN: Your Honor, may I briefly
20 respond? I think there's a way out of this.
21 Maybe what we can do is, once we hear back
22 from Mr. Lotterman, we can do that. We can
23 move forward. I think what might be helpful
24 is if SoCalGas can produce a person who knows
25 about the handwriting and we can ask
26 questions of both Mr. Neville and that
27 individual as a panel in case there are
28 questions to go to either aspect of the

1 document.

2 ALJ POIRIER: Mr. Stoddard?

3 MR. STODDARD: Thank you, your Honor.
4 I'm reluctant to jump in since we're trying
5 to have one attorney at a time here. I'm
6 only doing so because I was involved in the
7 meet and confer with Mr. Gruen on this issue.
8 I think it would be -- before any decision is
9 made here, yeah, I think a little bit more
10 discussion related to this issue of witnesses
11 on documents that haven't, frankly, been
12 addressed in testimony should be discussed
13 further.

14 You know, SED has presented
15 testimony. SoCalGas has presented testimony.
16 Our witnesses are available for
17 cross-examination on their testimony. They
18 also may be able to speak to any number of
19 documents, data requests, to the degree that
20 they relate to their knowledge or testimony.

21 However, to the degree that SED
22 didn't raise a specific issue in their
23 testimony, it's very likely that we haven't
24 addressed it in our testimony and that we
25 don't have a witness who can speak to it.

26 The purpose of hearings is to test
27 and examine the testimony that's been
28 presented and the evidence that's been

1 presented. It's not for an opportunity for
2 SED to conduct further discovery as to every
3 data request and document that's been
4 produced in this case to date.

5 So we can talk about it further
6 after a break, but I do think that we need to
7 think about this a little bit further before
8 we potentially create a need for producing
9 witnesses on issues that are neither relevant
10 nor have been addressed in testimony.

11 ALJ POIRIER: Mr. Gruen, do you have
12 any response?

13 MR. GRUEN: I wasn't expecting a
14 lengthy discussion here, nor do I want to
15 spend time on this foregoing cross time.
16 We've got a lot of extra questions that we
17 want to ask of Mr. Neville. I'm prepared to
18 move on. I think this should be discussed
19 later.

20 We don't stipulate to
21 Mr. Stoddard's -- to SoCalGas' views on this
22 though. We think this is fair game. It's
23 directly within Mr. Neville's bailiwick.
24 He's identified himself as familiar with
25 leaks and leak-related documents, as well as
26 the history of Well SS-25. It's on point.

27 ALJ POIRIER: Okay. I think what we'll
28 do is we'll move on, like you said, but I

1 will say, Mr. Stoddard, I mean I think it's
2 within the bailiwick, as Mr. Gruen said, and
3 I think there's some latitude on
4 cross-examination. So, you know, I think
5 we're going to move on at this time. I'd
6 like to see what happens after the break and
7 see if we can address it, but I'd like to
8 move on for now.

9 MR. GRUEN: Understood, your Honor.
10 I'm sorry, I thought I heard someone else
11 speaking.

12 ALJ POIRIER: Go ahead, Mr. Gruen.

13 MR. GRUEN: Thank you. Okay. We'll
14 move to another line.

15 Q So if we could turn to Exhibit 275
16 now. And while we're doing that, my
17 understanding is you're the person who has
18 testified about the records regarding
19 Well SS-25. So as that person, I want to ask
20 you questions about an apparent history
21 report from 2006 and whether that report was
22 filed with DOGGR.

23 Mr. Stoddard, I think, raised a
24 question on the record about the accuracy of
25 the date. I think through the cross, it's my
26 intent that the explanation, the basis for
27 the date that we identified at the beginning
28 of this morning, will become clear.

1 So with that, I'll read the title
2 page of this, the beginning of the title
3 page, for the record. The exhibit is
4 SED-275, History of Oil or Gas Well SS-25,
5 dated 2-26-2016. If we scroll down to the
6 next page, and if I could identify the Bates
7 number at the bottom, it's AC_CPUC_0008807,
8 and scrolling back.

9 Your Honor, it's my understanding
10 from SoCalGas that this is the document that
11 was produced to SED and DOGGR, but I'll ask
12 Mr. Neville for the record.

13 First of all, Mr. Neville, do you
14 recognize this document?

15 A Yes, I do.

16 Q And to your knowledge, was this
17 document provided to DOGGR?

18 A This document would typically not
19 be provided to DOGGR. My reasons for saying
20 that are to, one, in the heading of the work,
21 there's a part that says "NOT DOGGR Report."
22 So the company had a way in WellView to
23 record what was DOGGR report and what was not
24 required to be reported to DOGGR.

25 MR. GRUEN: Your Honor, can we go off
26 the record for a moment?

27 ALJ POIRIER: Off the record.

28 (Off the record.)

1 ALJ POIRIER: We'll be back on the
2 record. While we were off the record, we had
3 a discussion clarifying Exhibit SED-275.
4 Mr. Stoddard is going to provide some details
5 on that.

6 Go ahead, Mr. Stoddard.

7 MR. STODDARD: Thank you, your Honor.
8 In the course of meet-and-confer discussions
9 in advance of today's hearings, SoCalGas
10 stipulated that this exhibit numbered SED-275
11 was produced by SoCalGas to DOGGR and SED
12 following the incident. However, for
13 clarity, it is not our understanding that
14 this form was produced to DOGGR at the
15 time -- that it was necessarily produced to
16 DOGGR at the time that it was generated.

17 ALJ POIRIER: Thank you.

18 MR. GRUEN: Thank you. That's helpful.
19 Thank you, Mr. Stoddard. I appreciate that.
20 Go ahead, I'm sorry.

21 MR. STODDARD: Thank you.

22 And also just for clarity on the
23 record, again, this is something that counsel
24 for SoCalGas has stipulated to outside of the
25 hearing room. It does not necessarily mean
26 that that knowledge has been imparted to our
27 witness. So to the degree that counsel has
28 questions related to that issue, the witness

1 may not be able to answer them.

2 ALJ POIRIER: Understood.

3 Go ahead, Mr. Gruen.

4 MR. GRUEN: Thank you.

5 Q Let me just ask again because I may
6 have lost track if we had asked. Do you
7 recognize this document, Mr. Neville?

8 A Yes.

9 Q And you see the date 2-26-2016?

10 A Yes.

11 Q In the upper left corner?

12 A Yes.

13 Q Okay. That date is, in fact, after
14 the incident; is that correct?

15 A Yes, after the work activity.

16 Q And indeed after the incident
17 completed. Is that your understanding?

18 A Oh, the incident. Yes, it was.
19 Yes.

20 Q Okay. So with regards to the
21 "Start Date" column and the dates under
22 there, this is with regards to activities
23 that occurred on Well SS-25 in October 2007;
24 is that accurate?

25 A Yes.

26 Q Can you confirm that this document
27 was not, in fact, in the SoCalGas SS-25 well
28 file at the time of the incident?

1 A I can't confirm that it was in the
2 hard copy well file. This appears to me to
3 be a WellView electronic printout.

4 Q Okay.

5 A I can't confirm it was in the hard
6 copy file.

7 Q Okay. But those dates are accurate
8 with regards to the activity on the SS-25
9 well, correct, from 2007, October of 2007?

10 A Yes, I have no reason to believe
11 they're not accurate.

12 Q Mr. Neville, do you know why
13 SoCalGas waited approximately nine years
14 before providing a document about the state
15 of Well SS-25 to DOGGR?]

16 A Well, in the -- so as -- as we
17 discussed, the -- the work was done in -- in
18 2007, the dates 10-15 to 10-22. This type of
19 work was not required to be provided to
20 DOGGR. This particular activity on the well
21 wasn't a requirement that DOGGR had. So
22 that's the reason.

23 Q But, it's -- it -- could you scroll
24 up slightly, Mr. Zarchy?

25 But, it's a filled out form that
26 appears to be a DOGGR form showing history of
27 oil or gas well. Isn't that correct,
28 Mr. Neville?

1 A Yes, that is correct. That's a
2 WellView -- it's -- it's the utilization of
3 the same form that we -- that is used to
4 report, with one difference being in the
5 heading that -- that's greyed. There's a
6 notation there that says, "Not DOGGR report."
7 But, you're right; otherwise, the report --
8 the form of the report is the same for both
9 work that is reported and work that is not
10 required to be reported.

11 Q To your knowledge, as the records
12 witness in this proceeding, is it a -- as a
13 matter of practice, does SoCalGas fill out
14 history of oil or gas well forms with a DOGGR
15 imprimatur on them like this to identify work
16 that's been done, and then not report it to
17 DOGGR, as a matter of practice?

18 A I think it's a matter of -- of
19 making use of the same form. And not being
20 the -- the administrator for this WellView
21 software, I -- I'm -- I'm not sure why they
22 used the same form, but I do know that the
23 same form is used. I've seen this before,
24 and --

25 Q Okay. Go ahead. I didn't mean to
26 interrupt.

27 A Yeah. And -- and so, just to
28 summarize, it's the same form, with one

1 exception, and that's one that I noted that
2 does say a non-DOGGR report.

3 Q Okay. Let me ask you about the
4 substance of the form, if I can.

5 So the entry from 10-5, 2007, if we
6 read on there, it says, "Cal Coast Acidizing
7 pumped three percent KCl with biocide, killed
8 casing and tubing above wireline plug." Do
9 you see where I'm reading?

10 A Yes.

11 Q Okay. So does that tell you that
12 there was a wireline plug installed in the
13 tubing of well SS-25?

14 A Yes.

15 Q And just maybe, at a high level,
16 could you explain what a wireline plug is?

17 A So I -- I did describe that in --
18 in the opening testimony. The -- there's a
19 profile at the bottom of the tubing that
20 allows a wireline plug -- plug to be set,
21 which will isolate the tubing and casing from
22 the reservoir.

23 Q Okay. And so just to clarify, was
24 a wireline plug also installed in the casing?

25 A No. It would only be set in the
26 tubing.

27 Q Why is that?

28 A The -- there -- there isn't -- it's

1 not necessary, nor possible, to set a
2 wireline plug in the casing. The casing, in
3 fact, has the packer, which provides the seal
4 between the tubing and the casing. The
5 wireline plug then plugs the tubing. So the
6 combination of the two is what isolates the
7 pressure from the gas storage reservoir.

8 Q I'm envisioning almost like put --
9 trying to put a plug into an inner drain of a
10 bathtub that it could fit into the outer
11 drain, if you will. Does that sound like
12 a -- a fair understanding, a fair analogy?

13 A Yeah, to the -- to the extent --
14 there's two -- two pieces of pipe. There's
15 a -- you know, one inside drain pipe and one
16 outside drain pipe. You can run a plug in
17 the inside one, but you can't on the out --
18 the -- the outside one, the annulus area.

19 Q Okay. And was the wireline plug
20 that was installed in the tubing below the
21 subsurface safety valve?

22 A It would be below the subsurface
23 safety valve. It doesn't say that here, but
24 it -- that profile for which wireline plugs
25 are set in this well is below the subsurface
26 safety valve.

27 Q Thank you.

28 Your Honor, I may be experiencing

1 technical difficulties. I saw a camera --
2 let me see if I can restart my video.

3 ALJ HECHT: Yes, we have lost your
4 video.

5 ALJ POIRIER: I was going to mention
6 that when discussion stopped. Let's see if
7 you can restore that, and then we'll --

8 MR. GRUEN: Are we off the record?

9 ALJ POIRIER: Yes, we are.

10 (Off the record.)

11 ALJ POIRIER: Back on the record.

12 We're going to take a short break
13 until 10:47. Off the record.

14 (Off the record.)

15 ALJ POIRIER: We will be back on the
16 record.

17 We just took a short break to
18 resolve some technical difficulties that look
19 like they have been resolved, so let's
20 continue with the cross-examination by
21 Mr. Gruen.

22 MR. GRUEN: Thank you. And just to
23 refresh ourselves, the Exhibit SED-275, the
24 entry next to October 5th, 2007 identifies
25 killing casing and tubing above wireline
26 plug, and that's the part I -- I really want
27 to focus here -- with here.

28 Q Do you recall us talking about

1 that, Mr. Neville?

2 A Yes.

3 Q Okay. And just -- the wireline
4 plug it -- that they're talking about there,
5 is that below or above the subsurface safety
6 valve that we've discussed?

7 A It would be below.

8 Q Below the -- the subsurface safety
9 valve. And how do you --

10 A Yes.

11 Q -- know that?

12 A Well, in -- it's below the --
13 the safe -- the subsurface safety valve
14 itself was not in the well. You know, it had
15 been removed in 1980 or so. So it's below
16 the housing.

17 Q But, how is it possible to insert a
18 plug, because the plug is -- basically takes
19 up the entire inside diameter of the tubing,
20 does it not?

21 A It's a -- it uses what's called
22 packing. It's an expandable packing that is
23 just slightly smaller than the inside
24 diameter. And so when it's run into the
25 well, it runs down to the bottom of the well
26 to a -- to a profile, and when it hits this
27 profile, the wireline operator has the
28 ability to expand that packing out, and make

1 a seal inside the tubing. So --

2 Q Mr. Neville, is -- go ahead. I'm
3 sorry to interrupt. I wasn't sure if you
4 were done.

5 A Yeah. So it's -- it is -- it is a
6 plug, and -- and you're right, it -- it's --
7 it's slight -- it's smaller -- slightly
8 smaller than the inside diameter of the
9 tubing when it's run, because it has to be
10 run through the tubing; but, when it hits
11 this shoulder profile, which I've called,
12 it -- it latches into this shoulder, and then
13 the elastomer part is expanded out, and that
14 makes the seal.

15 Q All right. Without getting too
16 technical, let me just see if I'm tracking
17 this, because we -- your testimony is that
18 there was the housing left from the
19 subsurface safety valve. So even though the
20 subsurface safety valve was no longer
21 working, was pulled, there was still the
22 housing in the tubing where the subsurface
23 safety valve was. Do I understand that part
24 right?

25 A Yes.

26 Q And so, how is it, then, that
27 the -- this wireline plug can be -- get past
28 that housing, which is inside the tubing, and

1 get below it to then seal the tubing?

2 A The housing itself has an inside
3 diameter that is equal to or -- or slightly
4 larger than the tubing. So the plug -- it --
5 the well was designed for this very purpose.
6 It's designed such that a plug can be run all
7 the way to the bottom, and --

8 Q You're -- go ahead. I'm sorry to
9 interrupt.

10 A So it -- the -- the short answer is
11 the housing without the subsurface safety
12 valve is sufficiently sized in diameter to
13 allow the passing of this plug through it.

14 Q You -- you're saying that the
15 housing inside the tubing has an inside
16 diameter, that is, the space inside of it,
17 that's bigger than the tubing --

18 A That --

19 Q -- given the diameter of the
20 tubing?

21 A That's equal to or slightly larger.

22 Q But, it fits inside the tubing?

23 A Well, it's screwed to the tubing,
24 so it's -- it's -- it's -- it doesn't fit
25 inside of tubing. It's -- it's screwed to
26 the -- to the bottom of a joint or tubing.
27 So it actually is kind of -- it's integral to
28 the tubing itself. It becomes part of the

1 tubing in that it's screwed together to the
2 tubing.

3 Q Okay. And though it's your
4 testimony that this is inserted (inaudible)
5 the wireline plug, there's no indication here
6 about the depths as to where the wireline
7 plug was put, that I'm seeing. Is that
8 right?

9 A Right. On this activity report,
10 the depth is not noted; but, one would go to
11 the wellbore schematic to find the depth of
12 the profile that would accommodate the plug.

13 Q That was inserted in 2007?

14 A Yeah. So if -- I could show you
15 on -- on the schematic where that plug was
16 set.

17 Q Well, I -- I understand you could
18 show me where it was set.

19 What I'm asking is: Does the
20 schematic itself show where the plug was set
21 in 2007, to document the depth of it?

22 A Well, we would --

23 Q Does it show that, to your
24 understanding, Mr. Neville?

25 A It doesn't show it, but the plug
26 would -- would have been removed after this
27 particular work.

28 Q Okay.

1 A But --

2 ALJ POIRIER: Hi. This is ALJ Poirier.
3 We're having a lot of crosstalk; so if people
4 could slow down, make sure each other has
5 completed their statements, and then ask --
6 then continue, that would be helpful. Thank
7 you.]

8 MR. GRUEN: Understood. I will try to
9 be better and we will be sure we have a
10 crystal record. Thank you, your Honor. I
11 appreciate the instructions. Okay.

12 Q If we could go to Exhibit 287 again
13 that we did yesterday. So this is entitled
14 SoCalGas Interoffice Memo re Forms Used at
15 Aliso 9-4-1981.

16 If we scroll down to the next page
17 and if we go just to the bottom. Thank you.
18 So, this is Bates number
19 I1906016-SCG-SED-DR-88-000124, and that's
20 just for orientation. If we could go to the
21 document here that -- the page number that
22 end in the Bates number 149. I believe
23 that's this one. Yeah.

24 So do you remember us looking at
25 this page yesterday, Mr. Neville?

26 A Yes.

27 Q So I understand that you're not
28 familiar with the document itself, but what

1 I'd like to ask is whether you're familiar
2 with the actual leaks that are shown on the
3 document.

4 So I believe you stated yesterday
5 that you're familiar with leaks and the
6 history at Aliso Canyon wells in general;
7 isn't that right?

8 A Yes.

9 Q Okay. So with regards to this
10 document and the leaks that are shown on
11 there, does this list appear to you to
12 include casing leaks and shoe leaks on Aliso
13 Canyon wells?

14 A Yes.

15 Q And does it appear that these leaks
16 are accurately shown?

17 A It does appear that they're
18 accurately shown, yes.

19 Q Okay. So with that understanding,
20 I want to go through these leaks in more
21 detail with you to understand if you're
22 familiar with certain of them, with certain
23 ones.

24 So the "Problem" descriptions here,
25 that column, the first line that corresponds
26 with Well No. IW-63, do you see where I am?

27 A Yes.

28 Q Okay. And that's from 12/74 to

1 12/77 (sic) is the approximate date on one --
2 on that one.

3 A Yeah.

4 Q Okay. Thank you. And it says
5 there:

6 Hole in casing. Temperature
7 anomaly was 15 degrees. Noise log
8 confirmed leak.

9 Do you see that?

10 A Yes.

11 Q Okay. And then the second entry
12 from 4/76 to 4/77 for Well IW-78, it says:

13 Casing leak. Temperature anomaly
14 was three degrees.

15 Do you see where I am?

16 A Yes.

17 Q So with the temperature change of
18 three degrees --

19 MR. LOTTERMAN: Mr. Gruen, I apologize
20 for interrupting, but are you reading those
21 dates right? You said, "4/76 to 4/77."

22 MR. GRUEN: Did I? I may have
23 misspoken. Pardon me. I appreciate the
24 clarification and I will restate for the
25 record. Thank you, Mr. Lotterman.

26 Q 4/76 to 7/77. Do you see where we
27 are in the second line for Well IW-78,
28 Mr. Neville?

1 A Yes, I do.

2 Q Okay. And that's the one that --
3 that entry shows temperature anomaly for
4 three degrees that corresponds with the
5 casing leak in the problem description. Do
6 you see that?

7 A Yes.

8 Q Okay. So with the temperature
9 change of three degrees in this case, that
10 was enough to conclude that there was a
11 casing leak here; isn't that correct?

12 A Yes. It doesn't indicate the
13 depth, but it does indicate a casing leak. I
14 can tell you that I was able to do a
15 site-by-site comparison at the end of the day
16 yesterday with the data request. I can't
17 remember the number of it, but it was a
18 summary of casing leaks.

19 Q Yes. I believe -- would you
20 accept, subject to check, that that was the
21 response to Data Request 11?

22 A Yes.

23 Q Okay. Go ahead, please.

24 A So I was able to do a site-by-site
25 comparison noting that the well mains, such
26 as IW-63 and IW-78 were changed since this
27 report, and after noting the new name change
28 was able to do a site-by-site comparison and

1 did find that the first two that we spoke of
2 are on that list as well.

3 Q Okay. I understand. And what is
4 the new name? What's the name of IW-63 and
5 IW-68 wells as we know them today?

6 A If you'll oblige me to look at my
7 data sheet.

8 ALJ POIRIER: Let's go off the record.

9 (Off the record.)

10 ALJ POIRIER: We'll be back on the
11 record.

12 Before Mr. Neville goes, Mr. Gruen,
13 do you have a correction?

14 MR. GRUEN: Yes, thank you, your Honor.

15 Q Mr. Neville, I was -- I believe I
16 may have misstated the Well No. IW-63 in the
17 first entry. I believe before the break I
18 misstated it as IW-68, and if I am reading it
19 correctly and if you can confirm, that shows
20 as IW-63, the first entry. Does that look
21 right to you?

22 A Yes.

23 ALJ HECHT: I think you may have also
24 misspoken on IW-78 and called it IW-68.
25 Correct me if I'm wrong, just to clarify.

26 MR. GRUEN: Thank you, your Honor.
27 Apologies. So, I see that.

28 Q Just to clarify, the first entry I

1 see is IW-63. The second entry I see is
2 IW-78. Mr. Neville, does that look accurate
3 to you?

4 A Yes. 63 and 78.

5 Q Thank you. With that, go ahead.

6 A Okay. So IW-63 corresponds to
7 FF-35E.

8 Q You said "FF" meaning for "Fernando
9 Fee?"

10 A Yes.

11 Q Okay.

12 A And IW-78 corresponds to Porter
13 32C.

14 Q Okay. Understood. Let's go to the
15 Loss Estimate column, if we could. And for
16 -- I will use the terms that are on this
17 sheet, if I may. And you'll understand if I
18 refer to Well IW-63, you will understand it's
19 referring to the Fernando Fee well you just
20 identified, correct?

21 A Yes.

22 Q So in same, if I refer to IW-68,
23 you will understand it to refer to the Porter
24 well that you just identified as well?

25 A Yes, Porter 32C.

26 Q Porter 32C. I understood IW-63, if
27 we go to the Loss Estimate column there, it
28 shows there I believe that it lost 20 million

1 cubic feet per day over the 960-day period of
2 the leak, for a total of 19 billion 200
3 million cubic feet loss in total. Does that
4 look right to you?

5 A No. The number is 20 MCF, which is
6 20,000 cubic feet per day.

7 Q 20,000 cubic feet. Pardon me. It
8 takes an engineer to correct an attorney.
9 Thank you.

10 So the 20,000 cubic feet per day,
11 and then the total is nineteen thousand two
12 hundred thousand cubic feet. Or what's the
13 math on that in total? Can you state that in
14 right terms? I'll defer to your math on
15 this.

16 A Yes. It's nineteen thousand two
17 hundred thousand cubic feet per day or
18 19.2 million cubic feet.

19 Q 19.2 million cubic feet. How did
20 SoCalGas come up with this estimate?

21 A Again, this is 1974. The protocol
22 is to estimate the daily leak rate. And you
23 can see in this case, the daily leak rate was
24 20,000 cubic feet per day. There's some
25 estimate of the 960 days. And so this was
26 done using a temperature anomaly, and the
27 temperature based this anomaly -- again, this
28 is really hard to try to look back at

1 someone's work, but it appears that based on
2 this anomaly, that started on 12/74 and went
3 to 7/77 that was the number of days that this
4 well was leaking.

5 Q Okay. And how did SoCalGas come up
6 with the estimate of the amount of gas lost?

7 A In the daily amount lost?

8 Q The total amount lost.

9 A Well, an estimate was made of the
10 daily.

11 Q Okay. Then the daily. Go with the
12 daily, please.

13 A In this case, I don't know how that
14 was done. We have a --

15 Q Sorry for interrupting. Go ahead.

16 A We have a gas standard that says
17 that if you're not able to calculate it, that
18 the number 30 should be used today -- 30,000
19 cubic feet per day should be used. So it's
20 an engineering judgment or it could have been
21 a measurement. I just don't know.

22 Q Okay. Let's look at the third
23 entry, which I believe says 9/77 approximate
24 to and end from dates in this case. And I
25 believe that's an "F" for -- or maybe it's a
26 "P." It's hard for me to read. Can you
27 tell? Is that P4 that's shown under the well
28 number there in the third entry, Mr. Neville?

1 A I believe it's an F4.

2 Q Okay. F4, understood. And for
3 that well it says:

4 WSO holes leaked during pressure
5 test. Temperature anomaly at shoe
6 was same as current 1979 anomaly,
7 which was noise log with no noise
8 results.

9 Do you see where I'm looking?

10 A Yes.

11 Q Okay. So in that case, even though
12 there were no noise log results, because they
13 had a temperature anomaly at the shoe twice,
14 that was enough for them -- for SoCalGas to
15 go ahead and perform a pressure test on Well
16 F4; is that right?

17 A It's hard to positively conclude
18 that it was the temperature anomaly that
19 caused this workover. There could have been
20 other factors involved. But what I am saying
21 is these WSO holes leaked during a pressure
22 test. And I know from experience that the
23 pressure test would have been done with a
24 workover rig on the well. I don't know just
25 on this one sentence, you know, why the
26 workover rig was on the well.

27 Q Isn't it standard practice, to your
28 knowledge, for SoCalGas to include in a

1 problem description like this the factors
2 that went into the workover and the pressure
3 test, the thinking that one was necessary?

4 A Well, it would be -- this is just a
5 listing of well leaks, and I've seen many,
6 many cases where that -- the entire reasoning
7 is not necessarily listed.

8 Q Okay.

9 A So I just -- it's -- I just can't
10 say with positivity that the temperature
11 anomaly was the factor that caused this
12 workover.

13 Q Okay.

14 A It's likely, but I just don't know.

15 Q Pardon me for interrupting.

16 Understood. Give me just a moment.

17 So with the pressure test here,
18 that was the tool that enabled SoCalGas to
19 record here that the -- that the water
20 shutoff holes were leaking on Well F4 in
21 September 1977; is that right?

22 A Yes.

23 Q And then the case of Well S4 -- F4,
24 excuse me, the action taken was squeezing the
25 WSO holes?

26 A Yes.

27 Q And what does that mean?

28 A So once a workover is put on a well

1 and in the case of -- and WSO holes are
2 pressure tested, if the holes don't hold
3 pressure, then a decision is made to pump
4 into the holes, with -- first with workover
5 fluid and then with cement to try to stop the
6 holes from leaking.

7 Q Okay. And so is the estimated zero
8 loss in the Loss Estimate column because the
9 WSO holes were squeezed the same approximate
10 date as the leak was discovered?

11 A Well, again, you know, based on
12 just my best assessment here of what's going
13 on is that there wasn't a leak confirmed of
14 this particular well prior to the workover
15 rig on the well. So there was no loss. It
16 wasn't an operational leak for gas was
17 confirmed to be leaking.

18 Q Okay. And just as a matter of
19 clarification, does the well have to be
20 killed? Does a well have to be killed in
21 order to first -- first in order to perform a
22 pressure test?

23 A Yes, it does. It does need to be
24 killed because the pressure test is done with
25 workover fluid.

26 Q Okay. And as you mentioned at the
27 beginning, if I tracked you right, the loss
28 estimate, if you don't know otherwise, is

1 presumed to be 30,000 cubic feet per day.

2 Did I track you right on that?

3 A Right. That's a -- and that's a
4 proposed leak rate. If there's no actual way
5 to measure, but the end when a leak rate is
6 established, it's an engineering judgment.
7 It could be higher than 30. It could be
8 lower than 30.

9 Q Okay. If we could scroll down
10 slightly toward the bottom of this page,
11 Mr. Zarchy, and if we get to the last entry
12 there.

13 Now there, that last entry is
14 200,000 cubic feet per day over 420 days on
15 Well FF-35 from August 1977 to October 1978.
16 Did I read that right?

17 A So from August '77 to October '78,
18 yes.

19 Q October '78. Apologies if I
20 misstated the dates. That is my
21 understanding as well from reading this.

22 So, your total there is 84
23 thousand, thousand cubic feet per day.
24 Correct?

25 A No. The estimate per day is
26 200,000 cubic feet.

27 Q I'm sorry. I misstated. Maybe you
28 can -- I'm getting tripped up by the units.

1 Could you state the total amount of cubic
2 feet per day? Not per day. The total amount
3 of cubic feet estimated to be lost?

4 A 84 million cubic feet.

5 Q 84 million cubic feet. Thank you.

6 On average, how many millions -- or how many
7 cubic feet per day would you estimate a
8 casing leak on an Aliso Canyon natural gas
9 well loses?

10 A I don't think I would be
11 comfortable coming up with an average.

12 Q This leak loss is all below
13 SoCalGas' devices that are used to track how
14 much gas comes into and out of Aliso Canyon;
15 is that right?

16 A So the devices that track the gas
17 coming into and out of the Aliso Canyon
18 field, I assume you're referring to the main
19 meter going into and out of the field?

20 Q I believe so.

21 A Yes. So they would be -- these
22 losses would be unmetered. The gas would
23 have been metered in, but these were losses
24 in the storage fields.

25 Q So are ratepayers paying for gas
26 being injected into the Aliso wells but not
27 compensated for gas lost through the leaks in
28 the Aliso wells?

1 MR. LOTTERMAN: Objection. I think
2 that exceeds the scope of either
3 Mr. Neville's testimony or his expertise or
4 his experience.

5 MR. GRUEN: I can move on, your Honor.
6 Okay.

7 Q And just if we could, for
8 clarification, if we could go to SED -- where
9 -- I just am trying to get an understanding.
10 Is there a document we can refer to that's
11 the basis for converting IW to different
12 wells as they're called today? Where can one
13 refer to, to have a conversion, if you will,
14 because I believe the term "IW" is now
15 outdated, at least in many cases.

16 A Yes. I have a conversion sheet.

17 Q Okay. Do you have that in front of
18 you at your disposal?

19 A I'd have to start up my personal
20 computer. It's on there.

21 Q It's okay. I think what I -- let's
22 move on. Let's move on. I believe it may be
23 in the record already but I don't have it at
24 my fingertips. Okay.

25 I am going to ask you about
26 SoCalGas flowing gas from SS-25 into the
27 company gathering system in December 2015 and
28 the apparent stopping of the flowing of gas,

1 of that gas to the gathering system in
2 December of 2015 as well. And if you're not
3 able to answer questions about this, I
4 understand, but because this is SoCalGas
5 records that goes to Well SS-25, I'd like to
6 broach this and see if you, or perhaps
7 Mr. Schwecke is the right person to ask these
8 questions.

9 So with that, if we could introduce
10 Exhibit SED-288. And this is an e-mail from
11 Todd Van de Putte to Alan Walker, et al., re
12 SoCalGas Aliso Canyon Standard Sesnon 25
13 Daily Summary, 12/7/15; Estimated Work Plan
14 12/18/15 is the title page. And if we scroll
15 down, and the bottom of this, the Bates
16 number on the first page of the document is
17 AC_CPUC_0006876.

18 If we go to the top, so this is the
19 December 8th, 2015 date, and it said that --
20 with the heading, Standard Sesnon 25 Site, I
21 believe. Can you scroll down, Mr. Zarchy? A
22 little bit more. Yeah. Thank you. Okay.
23 Pardon me. I didn't properly lay a
24 foundation for this.

25 Let's go to the top again, if you
26 could. And this one is -- the date of the
27 e-mail is December 8th, 2015 with the subject
28 SoCalGas Aliso Canyon Standard Sesnon 25

1 Daily Summary 12/7/2015, Estimated Work Plan
2 12/8/2015. Do you see that?

3 A Yes.

4 Q I don't believe you're included on
5 this, but I wanted to understand if you have
6 -- if we scroll down again to the SS-25
7 heading.

8 ALJ POIRIER: Mr. Gruen, this is ALJ
9 Poirier, if you go back to the listing of
10 addressees, I think Mr. Neville is there, so
11 just for the clarity of the record.

12 MR. GRUEN: Oh. Thank you. Yeah.
13 Okay. So you are there. Pardon me.

14 Q So, Mr. Neville, do you recognize
15 this e-mail? You can scroll through it, if
16 you like.

17 A Yeah. I don't recognize it thus
18 far.

19 Q We'll follow you. You can tell us
20 where you want us to go.

21 A Yeah. I see the main leading
22 sentence there. I don't recall this
23 document.

24 Q So with regards to the information
25 in this document and documents like it, I
26 believe Mr. Schwecke's name is also on it.
27 Do you want us to ask questions of
28 Mr. Schwecke instead of you, about this

1 document and others like it?

2 A I think to the extent that it's
3 post-October 23rd, 2015, that's really
4 outside of my testimony. So I don't think I
5 would be the best one.]

6 Q Let me just try one question to be
7 sure. So with regards to the question "Set
8 up and began flowing" -- I'm sorry, with
9 regards to the statement "Set up and began to
10 flow the SS-25 well to the Gas Company
11 gathering system" -- do you see where I'm
12 looking?

13 A Yes.

14 Q Do you know how many days SoCalGas
15 diverted gas to the gathering system?

16 A I do not.

17 Q With that -- well, I won't press
18 this. I can see these questions are likely
19 better directed elsewhere. I appreciate your
20 indulgence, Mr. Neville and your Honors.

21 Mr. Neville, just to clarify, the
22 only other SoCalGas witness that's been
23 offered is Mr. Schwecke. Is he the right
24 person to answer these questions, the only
25 remaining witness I should say? Is he the
26 right person to answer questions about this
27 document and others like it?

28 A To be -- that's my -- I don't know

1 exactly what Mr. Schwecke knows, but he is
2 the witness that we have to -- that provided
3 the testimony for the well kills, so he would
4 be the best one at this point to ask.

5 Q Okay. Fair enough. Okay. I'll
6 move on. If we could go to your reply
7 testimony, back to SoCalGas Exhibit 15.
8 Going to the page with Bates Number 15.0010,
9 and that's page 9 at the bottom. Thank you.
10 There's the Bates number I just mentioned.

11 If we go to line 17, there it
12 states, "In response to questioning by SED,
13 Boots & Coots stated that it had all the
14 records that it required in order to plan and
15 execute its well control efforts."

16 Do you see that?

17 A Yes.

18 Q Were there any records that
19 indicated that SS-25 was not killable from
20 the top?

21 A I wouldn't -- I don't know.

22 Q You've indicated you're not the
23 witness to testify on the well-kill and
24 well-control efforts that are shown here. Is
25 it accurate to say that that statement in
26 your testimony is only based upon what you
27 read from Boots & Coots' statements in its
28 examination under oath?

1 A I -- I think it's -- it's supported
2 by their statement in their -- I think it
3 was -- deposition. But from my knowledge of
4 how wells are routinely well kills, I believe
5 I know what a company like Boots & Coots
6 would need. So it's a combination of my own
7 understanding in addition to their position
8 that they laid out in their deposition.

9 Q I just want to parse. I'm
10 listening carefully to your answer. You're
11 saying it's based on your own experience
12 about what a company like Boots & Coots would
13 need, but it's also your testimony that you
14 are not the witness testifying to the actual
15 kill attempts.

16 So would it be accurate to say that
17 you don't know whether Boots & Coots had what
18 it actually did need?

19 A Well, I would go in that case to
20 the deposition and what they said.

21 Q Okay. And that's your only basis
22 then, and I think for purposes of the record
23 we can use the deposition and examination
24 under oath transcripts interchangeably.

25 Do you understand that to mean the
26 same thing, examination under oath and
27 deposition, both referring to an interview of
28 Boots & Coots that was transcribed and you

1 were referring to those transcripts; is that
2 accurate?

3 A Yes, that's accurate. I guess I
4 didn't -- I wasn't familiar with the
5 terminology, but I think that's --

6 Q It's okay. I want to be sure we
7 have it right for the record and we're
8 talking about the same thing. Those
9 transcripts are your sole basis for the
10 statement we've just read in testimony; is
11 that right?

12 A I just don't know if I would go to
13 the sole basis. I could, but I just -- based
14 on what I believe a company like Boots &
15 Coots needs, I believe that they -- that they
16 had everything. They had our -- what I
17 mentioned in the testimony.

18 Q Mr. Neville, I just want to clarify
19 that the question isn't about what you
20 believe. It's about what you know. So with
21 that understanding, is it your -- is your
22 knowledge the basis for that statement? Is
23 the only source of your knowledge the Boots &
24 Coots transcripts?

25 MR. LOTTERMAN: Mr. Gruen, could you
26 show him the footnote again. That might help
27 refresh his recollection.

28 MR. GRUEN: Sure.

1 Q Let's go down to I think it's
2 Footnote 14. Do you see Footnote 14 down at
3 the bottom of page there referring to the
4 Danny Walzel and James Kopecky examination
5 under oath there?

6 A Yes.

7 Q Okay. So does that help refresh
8 your recollection that the examination under
9 oath transcript of Mr. Walzel and Mr. Kopecky
10 of Boots & Coots is the basis, the only
11 basis, for your providing that statement that
12 we just read?

13 A You know, as I think about it, it's
14 probably correct. They're the ones that --
15 they're the ones that would have -- that
16 would make the decision as to whether or not
17 they had what they needed.

18 Q Okay.

19 A Yes.

20 Q Okay. Thank you. Let's go back
21 to -- I think we're on reply. It's SoCalGas
22 Exhibit-15, Bates stamped 15.0006, if we go
23 up, and that's also page five. That's the
24 Bates number and page number that I just
25 noted. If we go up to line 13 there, you
26 state:

27 It is my understanding that
28 neither SED's nor Cal Advocates'

1 testimony is predicated on a
2 complete review of SoCalGas'
3 electronic databases or hard-copy
4 well fills for SS-25.

5 Do you see that?

6 A Yes.

7 Q If we could go to Exhibit SED-248,
8 which has already been marked and I believe
9 moved into the record for purposes of this
10 line of questions, the title page is SoCalGas
11 Response to SED and DOGGR, January 26, 2016,
12 Data Request.

13 On the first page, the Bates stamp
14 at the bottom is shown as SED-248.001. I'll
15 ask -- Mr. Neville, if we go to the top
16 again, do you recognize this as SoCalGas
17 Response to SED and DOGGR's Data Request
18 dated January 26, 2016?

19 A Yes.

20 Q Okay. And if we go to Question 1,
21 if we scroll down to Question 1, you can see
22 that question asked, "Were all well records
23 related to SS-25?"

24 Is that correct?

25 A Yes.

26 Q And the response identifies the
27 "enclosed electronic document production set
28 for copies of all documents comprising the

1 active SS-25 well file, documents Bates range
2 AC_CPUC_0000023" -- to the same prefix, and
3 then the ending is "759."

4 Do you see that Bates range there?

5 A Yes.

6 Q So this information that SoCalGas
7 provided to SED and DOGGR showed that
8 SoCalGas had in its SS-25 well file as of
9 January 26, 2016; is that right?

10 A Yeah, I -- that's the -- the
11 response is what is in the SS-25 well file.

12 Q Okay.

13 A Yes.

14 Q This is really just a foundational
15 line. So if we could go to Exhibit SED-294,
16 there the title page is SoCalGas Response to
17 SED Data Request 137. If we go to the bottom
18 of the first page, the Bates number is
19 SED-294.001.

20 If we scroll to the top,
21 Mr. Zarchy, of this page.

22 Do you recognize this is SoCalGas
23 Response to SED Data Request 137?

24 A Yes.

25 Q And you see at the bottom of the
26 first page, if we go to the bottom of this
27 page, "Question Set 1"?

28 A Yes.

1 Q So SED here was referencing to
2 questions from Data Request 129, Question 16,
3 and that asked about your personal
4 responsibilities related to the Aliso Canyon
5 well files before October 23, 2015; correct?

6 A Yes.

7 Q And continuing on the next page
8 after the objections, we ask --

9 Scroll up, Mr. Zarchy, I'm sorry.
10 Okay. Yes.

11 After the objections, Question 1A,
12 "State each date that Mr. Neville reviewed
13 the SS-25 well file prior to October 23,
14 2015."

15 Do you see that?

16 A Yes.

17 Q And if we look at the response to
18 Question 1A, do you see a substantive answer
19 to that question, Mr. Neville?

20 A Let's see. I'm not sure I
21 understand.

22 Q I'm wondering if you see a direct
23 answer that shows when you reviewed the SS-25
24 file prior to October 23, 2015. Is the
25 answer to that question provided there?

26 A Oh, I see. The question is "State
27 each date," and I do not see dates listed.

28 Q Okay. So just to clarify for the

1 record, can you state the dates that to your
2 recollection you reviewed the SS-25 well file
3 prior to October 23, 2015, today?

4 A Yeah, I wouldn't have -- with 116
5 wells there, I wouldn't have recorded when I
6 was in and out of each well file so I
7 wouldn't know the dates.

8 Q Do you have an approximation of the
9 last time prior to October 23, 2015, you
10 reviewed the SS-25 well file?

11 A No. I don't have -- I wouldn't
12 have an approximation. And I think even the
13 terminology "reviewed the well file" --
14 typically I don't go in and review the well
15 file. I'll go in and look at records and
16 temperature surveys. So to the extent that
17 means reviewed, that's what I did, but I
18 don't have any dates.

19 Q Okay. Give me a second.
20 Mr. Neville, let me just ask you directly.
21 With regards to the time period from
22 October 23, 2015, through February 18, 2016,
23 do you know the person or persons who was or
24 were responsible for updating the SS-25 well
25 file during that time period?

26 A Can you state the time period
27 again, please.

28 Q Yes. And I mean for the time, the

1 dates, to correspond to the beginning and
2 ending of the incident, when it was
3 discovered and finished. So the dates, as I
4 understand those, are October 23, 2015, to
5 February 18, 2016.

6 A I don't know who --

7 Q Okay.

8 A -- had that well file.

9 Q Okay. If we go back to your reply
10 testimony, SoCalGas-15, and we go to the page
11 with Bates stamp 15.0007, if we scroll up,
12 these are pictures of a file cabinet on
13 Figure 1, and, if we scroll down slightly, a
14 file drawer in Figure 2, according to their
15 captions both from Aliso as shown there.

16 Do you see where I'm describing?
17 Do you agree with that description?

18 A Yes.

19 Q Moving to the next page with the
20 Bates stamp 15.0008, there we see another
21 picture. If we scroll down just slightly, we
22 see Figure 3. If you could scroll up just a
23 little bit to include the picture and the
24 figure number. We see "Figure 3, Aliso
25 Canyon well file drawer" there; is that
26 right?

27 A Yes.

28 Q When were those pictures taken,

1 Mr. Neville?

2 A They were taken at some point just
3 prior this section of testimony -- and I
4 believe this is reply testimony -- so they
5 were taken in the days or so before -- days
6 or weeks before that testimony was due.

7 Q And just for the record, if we
8 could go to the beginning of testimony just
9 so we're clear on that date. Scroll down a
10 little bit. So your testimony is that the
11 pictures and the figures we just looked at,
12 all three pictures were taken several days
13 before March 20th of 2020; correct?

14 A Right, several days or it could
15 have been weeks but, you know, not months.

16 Q But not before the beginning of
17 2020; would that be accurate?

18 A It was definitely after opening
19 testimony.

20 Q Okay.

21 A I'm just not recalling all the
22 dates, but it was after opening testimony and
23 before reply testimony.

24 Q Fair enough. Thank you. Let's go
25 to your reply testimony, which is, again,
26 Exhibit SoCalGas-15. Are we there? Yes.
27 Okay. If we go to the Bates stamp
28 page 15.0013, that's page 12, then starting

1 at line 3 you say:

2 SED also contends that SoCalGas
3 did not create or keep groundwater
4 records or other records of
5 measurements relative to external
6 corrosion of underground pipe in
7 the SS-25, SS-25A, and SS-25B well
8 files. This allegation is
9 misguided and incorrect.

10 Do you see where I'm reading?

11 A Yes.

12 Q Turning to lines 7 through 14, you
13 add:

14 Accordingly, surface casings on
15 SS-25, SS-25A, and SS-25B were set
16 and cemented to 990 feet, 806
17 feet, and 900 feet respectively,
18 below the base of fresh water,
19 including groundwater. The
20 regulations do not require
21 creation or maintenance of
22 groundwater records and, for the
23 reasons noted above, it is not
24 necessary to do so. Accordingly,
25 no additional information related
26 to the establishment of the base
27 of fresh water was provided by
28 CalGEM. With respect to records

1 of measurement relative to
2 external corrosion of underground
3 pipe, in 2010, SoCalGas conducted
4 a re-work on SS-25(sic) and ran a
5 USIT casing inspection log.

6 Do you see that?

7 A Yes.

8 MR. LOTTERMAN: I believe it was 25A,
9 Mr. Gruen.

10 BY MR. GRUEN:

11 Q Pardon me. I may have misspoken.
12 My mistake. Is that a correction on line 14,
13 to SS-25A? Mr. Neville, if I misspoke, let's
14 just clarify for the record. Line 14 says
15 "SS-25A"; is that correct?

16 A Yes.

17 Q Just to unpack a couple of the
18 terms shown there, so USIT -- we may have
19 clarified this for the record yesterday but
20 just to refresh recollection, what does
21 "USIT" stand for?

22 A It's stands for Ultrasonic
23 Inspection Tool, I believe, but it's an
24 ultrasonic -- it's an ultrasonic casing
25 inspection tool.

26 Q Okay. And it sounds like it's for
27 the purpose of what its name suggests, for
28 inspecting casing, a tool for inspecting

1 casing in an ultrasonic way; correct?

2 A Yes.

3 Q And CalGEM is the new name for the
4 agency that was called DOGGR; right?

5 A Correct.

6 Q Okay. So with that passage in
7 mind, I'd like to ask questions relating to
8 whether SoCalGas ran a USIT inspection log on
9 Well SS-25. And so, as you suggest, the Well
10 SS-25 USIT casing inspection log could have
11 provided records of external corrosion on
12 Well SS-25 if one had been run on it;
13 correct?

14 A That's the purpose of the tool,
15 yes, is to identify wall loss features such
16 as casing corrosion.

17 Q And that would include picking up
18 or detecting the thickness of the casing on
19 Well SS-25; is that right?

20 A That would be -- that's the design
21 of the tool, yes, to pick up the thickness of
22 the casing.

23 Q And indeed USIT could have told
24 whether there were leaks on Well SS-25;
25 correct?

26 A Well, it's not a tool to pick up
27 leaks. It shows the degree of wall loss. I
28 don't think it shows areas -- I'm not sure if

1 it shows a hundred percent wall loss, if it
2 can show holes or not. But it's designed to
3 show wall loss and not necessarily leaks.

4 Q Okay. You're not clear whether it
5 can show a hundred percent wall loss, but it
6 does show wall loss. Can you find out the
7 answer to that, if USIT can detect a hundred
8 percent wall loss?

9 A Sure, I could find that out.

10 Q Okay. Maybe we could get an answer
11 after lunch.

12 A Okay.

13 MR. LOTTERMAN: Do you have a time
14 frame in mind, Mr. Gruen?

15 MR. GRUEN: Perhaps after lunch would
16 be helpful.

17 MR. LOTTERMAN: No, I'm sorry. Do you
18 have a time frame as to the capabilities of
19 the USIT?

20 MR. GRUEN: Oh, I see. Prior to the
21 incident.

22 Q So just with that, let me just
23 clarify. Mr. Neville, I believe
24 Mr. Lotterman is clarifying the time that I'm
25 asking these questions. So could USIT have
26 picked up wall loss on Well SS-25 prior to
27 the discovery of the incident; that is, prior
28 to October 23, 2015?

1 MR. LOTTERMAN: Mr. Gruen, I thought
2 your question was could USIT pick up
3 100 percent wall loss.

4 MR. GRUEN: Well, we refined it later.
5 Let's ask that just since it's on the record
6 and then I'll move on.

7 Q So could USIT have picked up
8 100 percent wall loss on Well SS-25 prior to
9 October 23, 2015? And my understanding,
10 Mr. Neville, is you don't know but you can
11 find out after lunch; is that right?

12 A That's correct. And is it okay if
13 I use the time frame of 2014/2015 time frame?

14 Q Why don't we start there.

15 A Okay.

16 Q And then the other question is same
17 question, and I think you can answer this
18 one. Was USIT able to pick up wall loss on
19 Well SS-25 prior to October 23, 2015? And I
20 believe you've testified that the answer to
21 that question is yes, but I want to be clear;
22 is that right?

23 A Yes, that's the purpose of the tool
24 is to detect wall loss, yes.

25 Q Okay. With that, let's go to the
26 page in your reply testimony with Bates stamp
27 15.0010. This is identified as page 9.

28 ALJ POIRIER: Mr. Gruen, I just want to

1 do a time check. What are you thinking on
2 this line of questioning?

3 MR. GRUEN: Thank you, your Honor.
4 Yeah, I think that we could probably finish
5 this line in the next 10 minutes or so, give
6 or take, depending on how this goes. I'm
7 anticipating 15 minutes tops and perhaps less
8 than 10.

9 ALJ POIRIER: That's fine. Please
10 continue.

11 MR. GRUEN: Okay. Thank you.

12 Q Okay. So the reply testimony with
13 Bates stamp 15.0010, which we just looked at
14 there at page 9 and from lines 7 to 11, you
15 state, "Moreover, the records reviewed by Cal
16 Advocates do not support that their summary
17 allegation that," quote -- and I'll read it
18 as you've put it with the brackets in
19 there -- quote, "these recordkeeping failures
20 by SoCalGas management resulted in one of the
21 biggest natural gas leaks in U.S. history."

22 Do you see that?]

23 A Yes.

24 Q And you continue in that passage,
25 "In fact, none of the issues raised by Cal
26 Advocates in its testimony created any unsafe
27 condition, let alone contributed to the leak
28 in SS-25." Do you see that?

1 A Yes.

2 Q Mr. Neville, was there a SoCalGas
3 investigation of the cause of the failure of
4 well SS-25?

5 A An independent investigation other
6 than the Blade investigation?

7 Q I don't want to use the term
8 "independent," but I -- I think your
9 distinction is fair.

10 The -- did -- was there any
11 SoCalGas investigation, separate from the
12 Blade investigation, of the cause of the
13 failure of well SS-25?

14 A Not to my knowledge.

15 Q Okay.

16 A I --

17 Q But, you don't know?

18 A I'm not aware of one.

19 Q Okay. Okay. To your knowledge,
20 did SoCalGas consider whether it was going to
21 do a failure analysis on well SS-25?

22 A I don't -- I don't know, and I --
23 and I'm not aware of -- of any discussions
24 about considering it.

25 MR. GRUEN: Okay. Your Honor, I
26 overestimated. That's all I have on this
27 line. And if you'd like, we can break for
28 lunch at this point.

1 ALJ POIRIER: Yeah, I guess that makes,
2 if -- if any other line you're going to go --
3 you have is going to go beyond 15,
4 20 minutes.

5 MR. GRUEN: I think I could try one
6 more, and I'm willing to gamble, your Honor,
7 if -- if we go long. I -- I think we could
8 do the hard stop at 12:15.

9 ALJ POIRIER: Okay. Let's -- let's go
10 ahead and try that.

11 MR. GRUEN: Okay. Understood.

12 Q Let's go to your reply testimony on
13 the page with Bates stamp SoCalGas-15.0012,
14 and that's page 11. And at line 1 you say,
15 "SED states that --" pardon me. I -- I spoke
16 ahead of the screen share there.

17 You say, line 1, "SED states the
18 key records, including operational data,
19 interoffice memos related to leaks, and
20 technical reports, appear to be missing from
21 June 6th, 1973 to October 23rd, 2015, i.e.,
22 the date of the incident. This ignores that
23 SoCalGas housed operational data in PI," or
24 P-I, "where it was easily accessed, and
25 intentionally did not include it in the well
26 history files. The statement also ignores
27 the fact that there were no memos related to
28 leaks in the SS-25 well file, because there

1 were no confirmed leaks in SS-25 prior to
2 October 23rd, 2015. SED does not indicate
3 what types of technical reports might be
4 missing from the well file."

5 Do you see that?

6 A Yes.

7 Q I'm going to ask you about the lack
8 of interoffice memos in the SS-25 well file.

9 Would you agree that there are
10 interoffice correspondences in the SS-25 well
11 file related to the subsurface safety valve
12 failure approximately 1979?

13 A Yes, I -- I do agree with that.

14 Q Okay. Do you agree that the 1988
15 memo that has been discussed in this
16 proceeding, and which called for the
17 inspecting of the casings of 20 wells,
18 including SS-25, was also in the SS-25 well
19 file?

20 A Yes, I believe it -- it was in the
21 well file.

22 Q Okay. Other than the interoffice
23 communications, those -- those two areas, did
24 you see any other memos in the SS-25 well
25 file?

26 A I don't recall other memos other
27 than what you -- what you just described.

28 Q Okay. And according to your

1 testimony, you would not expect to see any
2 about possible leaks -- you know what? Let
3 me -- let me strike that question. Let me
4 strike that.

5 And, your Honor, I think that some
6 of the questions that we have at this point
7 are -- are -- may take us longer than
8 15 minutes. That's -- that's one line that
9 we -- we skipped to that I'm wondering if we
10 might be able to break for lunch at this
11 point?

12 ALJ POIRIER: That's fine. We'll --
13 we'll do that. We'll -- we'll break for
14 lunch until 1:15, and then we'll continue
15 then. Thank you.

16 Off the record.

17 (Whereupon, at the hour of 12:00
18 p.m., a recess was taken until 1:20
19 p.m.)]

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AFTERNOON SESSION - 1:20 P.M.

* * * * *

DAN NEVILLE,

resumed the stand and testified further as follows:

ALJ HECHT: We'll be back on the record.

We are returning from lunch on May 5th. We are resuming with the cross-examination of Witness Neville by the SED attorney, Mr. Gruen.

I believe that there was one outstanding question from this afternoon that SoCalGas is able to answer now.

So Mr. Lotterman, can you please go ahead?

MR. LOTTERMAN: Actually, I'm going to let Mr. Neville do it, your Honor.

Mr. Neville, would you respond to Mr. Gruen's question about whether a USIT log is able to detect 100 percent wall loss in the 2014, 2015 timeframe?

THE WITNESS: Yes. In our search for that answer, the -- the -- the USIT is able to detect wall loss -- or a hole in excess of one inch in diameter.

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CROSS-EXAMINATION RESUMED

BY MR. GRUEN:

Q Okay. And so -- so it sounds like a qualified answer, then, that in certain instances, USIT can pick up a hundred percent wall loss when -- when the wall loss is more than an inch, or an inch or more. Is that --

A Yes.

Q Is that accurate?

A That -- that's correct. That's accurate that it -- the USIT is able to detect a hole of a diameter greater than one inch, but not less than one inch in diameter.

Q Okay. And when it can pick up for smaller spaces, it can pick up less than a hundred percent wall loss, then?

A Yes, it -- if some -- there is a -- it -- it -- for what is not a hole, the tool can pick up wall loss. It just has difficulty with a hole.

Q Okay. Thank you. All right. Continuing on -- I appreciate the answer. Thank you for the -- the research.

Mr. Neville, if we could go back and get familiar again with Exhibits 286 and 287. And I believe these are the -- the leaks data response and the -- the -- there was another reference. So if we could bring

1 that up, just to refresh memory, and let's
2 start with 286. I believe this is 287.
3 Yeah. This is 286. So this -- 286 with the
4 title "SoCalGas Response to SED Data Request
5 11."

6 And if we scroll down, do you
7 recall speaking to this document,
8 Mr. Neville?

9 A Yes.

10 Q And this was the leaks that you and
11 a team that you worked on had identified
12 all -- it was your best effort at identifying
13 the leaks -- the leak history on the Aliso
14 Canyon wells in response to an SED data
15 request. Is that accurate?

16 A Yes.

17 Q Okay. So if we go to Exhibit 287
18 now, and what's -- do you recall us reviewing
19 this document, Mr. Neville?

20 A Yes.

21 Q Okay. And I believe you had
22 indicated from your research last night that
23 where we had -- and I'm sorry. Mr. Zarchy,
24 can you scroll up slightly? Yeah. There we
25 go -- where we had identified IW-63 in --
26 first, actually, you had stated that
27 corresponded in today's terms to well
28 FF-35-E. Do I understand that correctly?

1 A Yes.

2 Q Okay. So with that, if we could
3 scroll down to the page number -- I believe
4 it's -- ends in the number -- the Bates
5 number 30, so DR 88 0001129 and 1130.

6 So if you could scroll up several
7 pages to find that, Mr. Neville --
8 Mr. Zarchy. Excuse me. Great. Okay.

9 So here, Mr. Neville, do you
10 recognize this as a table -- I think I'd
11 asked you before lunch if you had a -- a
12 sheet that converted well names from IW to
13 what we understand to currently be called.
14 Do you recall me asking about that?

15 A Yes.

16 Q And does this appear to be a
17 translation sheet, if you will, that compares
18 IW wells to the -- the wells that are
19 currently -- well names that are currently in
20 use?

21 A It -- it appears to be. It's not
22 the sheet that I used.

23 Q Okay. But, you see there, if we
24 look maybe ten lines down or so,
25 approximately, that IW-63, under the well
26 column, appears to correspond with -- in the
27 site column, site FF-30. Does that appear
28 accurate to you?

1 A Yes.

2 Q Okay. So is -- is it your
3 testimony that this document is not an
4 accurate translation document, then,
5 Mr. Neville?

6 A Okay. If you could give me just a
7 minute to -- to look at this --

8 Q Of course.

9 A -- document.

10 Q Okay. I have a -- an explanation
11 for why that -- why the numbering is
12 different.

13 Q Go ahead.

14 A And so this document -- if you
15 could scroll up and get the date for me,
16 please. Is that 1981? It looks like it's
17 1981. That's --

18 Q Okay.

19 A They have the site listed, and --
20 next to the well. If you look at the far
21 left corner, that's the site. So IW-63 is on
22 the FF-30 site, but it is, in fact, FF-35-E.

23 Q Uh-huh.

24 A It's --

25 Q Okay.

26 A They have -- in this particular
27 sheet that you're showing me, they don't list
28 the corresponding well name. They list the

1 site.

2 Q I see. Okay. If we could -- I
3 see. That's -- I appreciate that
4 clarification. Okay. Bear with me a second.

5 Okay. And what about -- I think we
6 have well P-43, if we could scroll down on
7 this -- no. I'm sorry. It's -- it's the
8 prior page. We were on the Table 2, and I
9 apologize. I don't have the page number;
10 but, Mr. Zarchy might be a step ahead of me.
11 I think it might be -- yeah. Keep going.
12 Keep going, scrolling the way you were.

13 ALJ HECHT: We'll be off the record.

14 (Off the record.)

15 ALJ HECHT: We'll be back on the
16 record.

17 We just went off to find the page,
18 and I think the witness and documents are
19 both ready now. Please proceed.

20 MR. GRUEN: Thank you. So this is,
21 again, SED Exhibit-286, and the Bates number
22 is still the DR 88 series, but ending in
23 1149.

24 Q And if we look at P-43 at the top
25 of this table, do you see where I am,
26 Mr. Neville?

27 A Yes.

28 Q And the dates shown there are from

1 three of '76 to nine of '77?

2 A Yes.

3 Q Okay. And about -- I see. I --
4 I -- just a clarification. I believe this is
5 Exhibit SED-287 that we're on.

6 About halfway down the page, do you
7 see reference -- can you scroll down,
8 Mr. Zarchy? Okay. Let's go back to
9 Exhibit 286 now.

10 ALJ HECHT: Okay. We'll be off the
11 record.

12 (Off the record.)

13 ALJ HECHT: We'll be back on the
14 record.

15 You may proceed, now that we have
16 the page.

17 MR. GRUEN: Thank you.

18 Q So you see reference in Exhibit
19 SED-286 to well P-69-A in that -- in the
20 table, Mr. Neville?

21 A Yes. I do, yes.

22 MR. GRUEN: Okay. Can you large --
23 enlarge it a little bit, Mr. Zarchy? It's
24 just hard to follow where exactly it is.
25 Yeah. That's great.

26 Q Is that -- can you see that,
27 Mr. Neville?

28 A I'm looking for P-69-A. There it

1 is, at the very bottom. Oh, there's -- okay.

2 Q Toward the middle. We have it
3 enlarged now.

4 A Okay. I see -- I see it.

5 Q It's toward the middle.

6 ALJ HECHT: I am -- this is Judge
7 Hecht. I am seeing P-69-A in two places on
8 the screen at the moment; one's in the
9 middle, and one's at the bottom. So let's
10 just be clear on the dates. I thought that
11 we're looking at 5-19, 1981, but please
12 correct me if that is wrong.

13 MR. GRUEN: It's my mistake. It's
14 6-18, 1982, the entry of P-69-A at 6-18,
15 1982.

16 Q Do you see that?

17 A Yes.

18 Q And also, SS-2 in 1982?

19 A Yes.

20 Q So both of those are WSO
21 perforations. Correct?

22 A Correct.

23 Q And both of those are above the
24 packer?

25 A I would have to look at the -- the
26 diagrams to make sure. It's possible they --
27 they are below the packer.

28 Q Okay.

1 A But, I -- I don't know without
2 looking at the diagrams.

3 Q Okay. How -- let me see.

4 So -- but, these were both leaks,
5 would you agree, those WSO perforations, as
6 part of the -- the leak table that you
7 provided?

8 A Yes. And I could help qualify what
9 exactly a leak is on a WSO hole, which may
10 help, if you'd like.

11 Q Please go ahead.

12 A A -- of course, a WSO is already a
13 hole. It's an intentional perforation. So
14 really, when we're talking about a WSO hole
15 leak, it's a issue with the cement integrity
16 outside of the -- the WSO hole itself. It's
17 very similar to a shoe leak, the difference
18 being a shoe leak is typically where gas
19 leaks around the bottom of the casing shoe
20 through -- through a cement column. A WSO
21 hole leak is gas that leaks through the hole
22 which is intentionally put, but through the
23 cement.

24 Q Okay. All right. Let's turn to a
25 different line.

26 Does -- let me just ask you if --
27 with regards to leaks and causes of leaks, in
28 particular, does SoCalGas have a repository

1 where it keeps documents that show causes of
2 leaks?

3 A So a single repository, such as
4 what? Such as the spreadsheet that we're
5 seeing here?

6 Q I mean a repository that shows
7 records that -- not a list, like this, but
8 the actual records that would show the causes
9 of the leaks.

10 A Well, the -- the records would be
11 in the individual well files, and -- and the
12 causes of the leaks can be found in -- in the
13 red -- in the -- the well file. It's -- can
14 be seen on -- on well schematics where the
15 list of work on a particular well is
16 recorded. That's one -- one potential
17 source. It will say, for example, "repaired
18 stair -- stage collar leak." That would be
19 on the -- in the well file for the particular
20 well. So it depends on -- on -- yeah. I'm
21 not going to say one -- one size fits all
22 here, you know. There's the -- there --
23 it -- the first place to identify a leak
24 would be on the wellbore schematic that shows
25 a list of the work done on the well.

26 Q Okay. I think we need to maybe
27 clarify here.

28 There -- it's not your testimony,

1 is it, that every well leak in Aliso has an
2 identified cause?

3 A Well, I guess it's -- I guess the
4 definition is cause. We have certainly
5 identified various causes in the -- the
6 column there that's shown, you know, a shoe
7 leak versus a stage collar leak versus a WSO
8 versus a casing body leak itself.

9 Q I -- I appreciate your
10 clarification. And I think what I'm trying
11 to get at is when I talk about cause, maybe
12 there's a broader definition, such as
13 environmental factors, things like water
14 that's touched the well ground, water that's
15 caused corrosion, things that might be
16 related to the leak outside of the strict
17 metallurgical sense. Do you understand what
18 I mean by that?

19 A Yes, I -- I do. There -- there
20 are, in the well files, logs that would help
21 further define the location of the wall loss,
22 whether it was internal or external, where
23 there were damage. So there is, you know,
24 another level of -- of cause associated with
25 the casing leak.

26 Now, to go to the -- the next level
27 with -- my understanding, I -- I would
28 presume or believe that would take a lot more

1 than what -- what we have in the way of tools
2 to -- to help with the determination of
3 the -- of -- of the failure.

4 Q Okay. So the -- the -- the
5 additional factors that you've just
6 described, there isn't a set of records that
7 shows those kinds of causes of leaks. Is
8 that right?

9 A The records would be the -- the
10 casing inspection log itself or the workover
11 that would show a pressure test. But,
12 most -- the -- the -- the predominant data
13 would be the casing inspection log or other
14 types of casing logs run that would help
15 determine whether, you know, we're talking
16 about an inside damage or an outside
17 corrosion issue.

18 Q Okay. But, those casing inspection
19 logs that you just talked about, they're
20 focusing strictly on the corrosion or wall
21 loss inside or outside of the well casing,
22 not the factors that caused that well loss or
23 that corrosion -- that wall loss or that
24 corrosion, excuse me. Is that right?

25 A That's -- that's correct. The
26 casing inspection logs will help define
27 whether internal or external and the type of
28 wall loss; but, it won't determine the cause

1 of the wall loss.

2 Q Okay. So you -- you're not
3 testifying that there are records that are
4 showing the cause of the wall loss. Is that
5 right?

6 A To go to the -- to -- to what we --
7 to what you're defining as cause is, to the
8 cause of the wall loss, there wouldn't be
9 records, or I don't know of records that --
10 that exist for that.

11 Q Okay. Thank you. Let me continue.
12 So do you recall, before lunch, I
13 was asking you about exhibit -- I'm sorry.
14 You were touching on interoffice memos in the
15 SS-25 well file. Do you recall us talking
16 about -- about that before lunch?

17 A Yes.

18 MR. GRUEN: Okay. So if we could go to
19 Exhibit 29 -- SED-295, do you have that
20 handy, Mr. Zarchy?

21 And this is entitled -- the cover
22 page is entitled "SED-295, SS-25 Well File."
23 And if we could scroll down to the first page
24 after the title, maybe the -- zoom out.
25 So -- okay. So this is a -- a large file, I
26 recognize.

27 Q But, do you -- well, it may take a
28 little bit of time to review this.

1 A Okay.

2 ALJ HECHT: Should we go off the
3 record, then?

4 MR. GRUEN: Yes, please, your Honor.

5 ALJ HECHT: All right. We'll be off
6 the record.

7 (Off the record.)]

8 ALJ HECHT: We'll be back on the
9 record.

10 We found the page and had a brief
11 conversation about the appropriate witness.
12 So, Mr. Gruen, you may proceed.

13 MR. GRUEN: Thank you, your Honor.

14 This is Exhibit SED-295. It has the
15 name, the file name SS-25 Well File, but it
16 omits invoices that were part of the well
17 file. And this is what I understand SED
18 received from SoCalGas, except for the
19 invoices.

20 So, maybe what we -- I should also
21 say for purposes of ease of reading the file,
22 we compiled the documents in this file by
23 chronological order. So, but the Bates
24 numbers are going to be different because we
25 didn't receive Bates numbers corresponding
26 with the chronological order. So with that
27 understanding, we can go through our
28 questions about this.

1 So if we could turn to the Bates
2 stamps that have ending 134, maybe do a
3 search for that, Mr. Zarchy, and look for
4 AC_CPUC_0000134. Rotate that. I will just
5 read it at the bottom just to show everyone
6 the Bates stamps are there.

7 Q Do you see AC_CPUC_0000134 at the
8 bottom of the page we just turned to,
9 Mr. Neville?

10 A Yes.

11 Q Okay. And this is an interoffice
12 memo. Does this appear to be interoffice
13 correspondence relating to not only SS-25 but
14 SS-9 as well?

15 A Yes.

16 Q Okay. And let's go to the document
17 that ends in 71, if we could.

18 A Okay.

19 Q Okay. And the Bates number is --
20 pardon me. AC_CPUC_0000071 at the bottom
21 there. And if we scroll up on the page, do
22 you recognize this as well as interoffice
23 correspondence for other wells, but also
24 including Well SS-25?

25 A Yes.

26 Q Okay. And if we -- before we move
27 away from this one, this interoffice
28 correspondence doesn't relate to the

1 potential leak, is that right, on Well SS-25
2 or any of the other wells?

3 A Let me give that a quick read.

4 Q Sure.

5 A I'm sure it doesn't, but.

6 ALJ HECHT: We'll be off the record.

7 (Off the record.)

8 ALJ HECHT: We'll be back on the
9 record. Please proceed.

10 BY MR. GRUEN:

11 Q Okay. Off the record, I understand
12 you read this, and do you see any reference
13 to leaks in this interoffice memo?

14 A No.

15 Q Okay. Let's go back. I apologize,
16 but let's go back to the Bates number ending
17 134 and it's the same question just above it.
18 If you want to take a moment to look at it, I
19 appreciate we can go off the record. But I
20 will ask you the same thing if you see any
21 reference to leaks in this interoffice memo
22 as well.

23 A I probably should take a look at
24 and read.

25 Q Understood. Do you want to go off
26 the record, your Honor, to give Mr. Neville a
27 moment?

28 ALJ HECHT: We'll be off the record.

1 (Off the record.)

2 ALJ HECHT: We'll be back on the
3 record.

4 BY MR. GRUEN:

5 Q Mr. Neville, I understood off the
6 record you felt you had enough time to
7 review, correct me on that, but assuming
8 that's the case, I will take by your answer
9 if it is, is there any relation to leaks in
10 this interoffice memo?

11 A There isn't any relation to casing
12 leaks. There is some mention of tubing or
13 control line leaks.

14 Q Okay. And if we go to
15 AC_CPUC_0000072, and that's the Bates number
16 I just read there and if you want to take a
17 moment, do you recognize this as interoffice
18 correspondence regarding Well SS-25?

19 A Yes.

20 Q Do you want to take a moment to
21 read this?

22 Your Honor, would you like to go
23 off the record, if he does?

24 ALJ HECHT: Yes. We'll be off the
25 record.

26 (Off the record.)

27 ALJ HECHT: All right. Looks like the
28 court reporter is ready. We'll be back on

1 the record.

2 BY MR. GRUEN:

3 Q Thank you. Mr. Neville, after
4 having reviewed this document, do you see any
5 discussion of tubing or casing leaks related
6 to SS-25 in this memo?

7 A No.

8 Q Okay. And I should say just for
9 clarification, I'm using the term "memo." I
10 think you may have as well, "memo" and
11 "interoffice correspondence" interchangeably.
12 Do you understand those terms in this context
13 mean the same thing?

14 A Yes.

15 Q Okay. And if we scroll through
16 this document and the attachments with it,
17 let's go to the bottom. Let's look for the
18 page Bates number 0207145. Scrolling down a
19 little bit more. Okay. And excuse me I had
20 this misread. 0207141, several pages above.

21 So this -- and the Bates number
22 shown there was just mentioned and if you go
23 up to the top, more interoffice
24 correspondence related to Well SS-25.

25 A Yes. That's right.

26 Q Okay. Mr. Neville, I just want to
27 observe the Bates number in this particular
28 case and if you can tell from the Bates

1 number whether this piece of interoffice
2 correspondence was from the SS-25 Well File
3 that SoCalGas first provided to SED. Can you
4 tell if we scroll down to the Bates number
5 again?

6 MR. LOTTERMAN: Objection. Calls for
7 speculation.

8 ALJ HECHT: Is there a way to rephrase
9 the question?

10 MR. GRUEN: Sure. Yes, your Honor, I
11 will do that.

12 ALJ HECHT: Thank you.

13 MR. GRUEN: Pardon me, your Honor.

14 Q Mr. Neville, to the best of your
15 knowledge, was this piece of interoffice
16 correspondence included in the SS-25 Well
17 File that SoCalGas first provided to SED when
18 SED asked for it?

19 A To the best of my knowledge, I just
20 wouldn't know for sure the answer to that
21 question.

22 Q Okay. All right. Let's take
23 another look at it, look at another example
24 of a well file to get an idea of the extent
25 of interoffice correspondence as the company
26 expected leaks in another well.

27 So if we could introduce Exhibit
28 SED-296. And that's -- the title of this is

1 the SS-29 Well File.

2 And if we could ask you,
3 Mr. Neville, did you have a chance to review
4 this document when we served it?

5 A I had a chance. I don't recall
6 actually reviewing this document. I haven't
7 reviewed it. I am familiar with this type of
8 document.

9 Q Okay. Are you familiar with this
10 as this entire document as the SS-29 Well
11 File?

12 A Yes. This would be a document in
13 the SS-29 Well File.

14 Q Okay.

15 MR. LOTTERMAN: Mr. Gruen, with your
16 permission, would you mind if I gave
17 Mr. Neville a hard copy of this?

18 MR. GRUEN: Oh, of course. I think
19 that would be helpful. Thank you,
20 Mr. Lotterman.

21 MR. LOTTERMAN: And would you mind
22 giving me the exhibit number again?

23 MR. GRUEN: Sure. It's Exhibit
24 SED-296.

25 MR. LOTTERMAN: All right. Give me one
26 minute.

27 MR. GRUEN: I should say, it's okay
28 with me if it's okay with your Honors. I

1 don't have any concerns.

2 ALJ HECHT: It is fine and we'll be off
3 the record for a minute.

4 (Off the record.)

5 ALJ HECHT: We'll be back on the
6 record.

7 We have been off the record
8 discussing when to take a break. And now
9 we're going to take that break and go off the
10 record. So we're off the record.

11 (Off the record.)

12 (Break.)

13 ALJ HECHT: We'll be back on the
14 record.

15 While we were off the record,
16 Mr. Lotterman consulted with his witness, and
17 hopefully we can find out how much time he
18 needs to familiarize himself with those
19 documents that were mentioned earlier.

20 Mr. Lotterman.

21 MR. LOTTERMAN: I'm deferring to my
22 counsel, your Honor, Mr. Stoddard.

23 MR. STODDARD: Thanks, your Honor.

24 So on the first issue, I believe not
25 necessarily about time but about stipulation
26 as to the document that we were discussing
27 related to SS-25 Well File, SoCalGas cannot
28 agree to entry of that exhibit. It's been

1 altered in at least two ways described by SED
2 including removing of documents, as well as
3 reordering. However, if SED would like to
4 offer another exhibit based on the original
5 well file production, we could then proceed
6 with the line of questioning tomorrow or
7 stipulate to entry of that exhibit.

8 ALJ HECHT: And just to be sure that
9 I'm clear on what you are proposing, it
10 sounds like you are proposing a new exhibit
11 that consists of the actual well file as it
12 was transmitted to SED; is that correct, so
13 that they match?

14 MR. STODDARD: The original production
15 version. So it would just be -- if you look
16 at the version that was -- no, you probably
17 don't have it in front of you, but if you
18 look at the version that Mr. Neville was
19 looking at a few moments ago in which SED was
20 presenting, it had reordered the Bates
21 numbering of the different records into a
22 chronological format or that's how it was
23 represented by Mr. Gruen. That's altering
24 the original document as it was produced to
25 SED.

26 However, again, if SED wants to
27 replace that exhibit or provide another
28 exhibit that is based on the original

1 production with the Bates numbers in order
2 and the complete well file, we would
3 stipulate to entry of that exhibit.

4 ALJ HECHT: Mr. Gruen, do you have
5 thoughts on that?

6 ALJ POIRIER: Mr. Gruen, you're on
7 mute.

8 ALJ HECHT: Yes.

9 MR. GRUEN: Pardon me. Your Honor, can
10 I take that under advisement and we can meet
11 and confer offline with SoCalGas about
12 whether that will work?

13 ALJ HECHT: Certainly you can do that.
14 That I think -- to me that means that this
15 will not be a line of cross that you will be
16 doing today and it would be deferred until at
17 least tomorrow; is that correct?

18 MR. GRUEN: Yes. We don't have any
19 additional cross on Well SS-25, the well file
20 related to Well SS-25 at this time, your
21 Honor.

22 ALJ HECHT: Okay. Then that might
23 answer both of the questions, the one about
24 stipulating and the one about timing because
25 we will not be dealing with this until
26 tomorrow.

27 Mr. Gruen, how long will it take to
28 get that modified exhibit out, or rather

1 unmodified exhibit out?

2 MR. GRUEN: I can -- I don't know at
3 the moment, your Honor. I can bring that
4 back to staff, who is responsible for it and
5 get an answer. Assuming -- that may well
6 work for us, but we'll endeavor to get an
7 answer to you as soon as we can.

8 ALJ HECHT: Thank you. We will be
9 discussing schedule again at the end of the
10 day and maybe we can clarify some of this
11 then. I do recognize that there are actual
12 human beings who are doing actual work to
13 prepare these things and to post the
14 transcripts and to just do everything that
15 needs to be done to let us be here.

16 I will also observe that these
17 issues with the exhibits are the reason that
18 when I have in-person hearings, which I've
19 always had before, we exchange the
20 cross-exhibits when the witness comes up or
21 certainly by the end of the day and then we
22 all know we're looking at the same thing. So
23 this I think is partly a shortcoming or quirk
24 or something with the format we've got right
25 now. Okay.

26 With that, is there anything else
27 before we continue with cross-examination?

28 MR. GRUEN: Nothing from SED, your

1 Honor.

2 ALJ HECHT: All right. Then I think
3 you can resume.

4 MR. GRUEN: Okay. I apologize, your
5 Honor. I wanted to clarify whether SoCalGas,
6 that Mr. Neville can confirm, we have done
7 some reordering on the SS-29 Well File as
8 well. And I wanted to clarify if Mr. Neville
9 at this time is able to confirm he is
10 familiar with that well file or --

11 MR. LOTTERMAN: Your Honor, my thought
12 on that is let's take that on a
13 question-by-question basis. I suspect
14 Mr. Neville will recognize various forms and
15 various information. I don't think he would
16 be able to testify as to its completeness.

17 ALJ HECHT: Thank you. I will also
18 call on Mr. Stoddard. I believe he had --

19 MR. STODDARD: Again, co-counsel
20 covered it mostly. Although, again, I am
21 concerned about, you know, we can proceed
22 with questioning, but to the degree we're
23 getting this record, this document into the
24 record, I'm a little concerned about a
25 reordered well file, we will -- we can let
26 the questioning proceed and we can address
27 that later.

28 MR. GRUEN: Your Honor, may I? I think

1 perhaps there's a way forward here, if I may
2 respond.

3 ALJ HECHT: Yes, please go ahead.

4 MR. GRUEN: Thank you. Your Honor, we
5 can also take under advisement if the
6 reordering of the SS-29 file in the order
7 that it was transmitted would be doable and
8 if it's acceptable for SoCalGas, if they
9 would stipulate to that document going into
10 the record as it was initially provided in
11 the same order, if that would be acceptable.

12 ALJ HECHT: I'm going to -- is there
13 any response from SoCalGas?

14 MR. STODDARD: No. We can -- I think,
15 you know, again, in my view it makes sense to
16 let the questioning proceed. We can see how
17 the document is used and we can consider
18 which version; again, generally the
19 preference would be for the unmodified
20 version of documents onto the record, but we
21 can take this as it goes.

22 ALJ HECHT: All right. With that in
23 mind, I think we can proceed. Thank you for
24 bringing that to our attention, Mr. Gruen.
25 Please do investigate what it would take to
26 put those back in the order in which they
27 were produced.

28 MR. GRUEN: Yes, your Honor.

1 ALJ HECHT: Thank you. Go ahead.

2 BY MR. GRUEN:

3 Q Okay. Mr. Neville, we have up on
4 the screen share Exhibit SED-296. And if we
5 could, excuse me, as counsel suggested, this
6 is in revised order. But let's go to certain
7 pages and see if we can see if you recognize
8 them as, or if you have a familiarity with
9 them.

10 So first, if we go to the page with
11 Bates number AC_CPUC_0118309, if we go to the
12 bottom. And we can see the Bates number I
13 just read. And if we go to the top of that
14 document, here it -- this is a FLO-LOG dated
15 November 17, 1987 for temperature and noise
16 log, this type of survey, and it is for Well
17 SS-29; is that accurate?

18 A Yes.

19 Q Do you recognize this document,
20 this particular page of the document that
21 we're showing you, Mr. Neville?

22 A I do. I recognize it. I can't say
23 that I've actually seen it, but I recognize
24 it to be part of a document pertaining to the
25 production, pertaining to a noise and temp
26 log run by FLO-LOG in SS-29.

27 Q Okay. Thank you. The purpose of
28 the survey is to check for shoe and WSO leak;

1 is that right?

2 A Yes.

3 Q And at the bottom under Remarks, if
4 we could go there, scroll down slightly.
5 Again, here a remark says, "possible shoe
6 leak." Is that correct?

7 A Yes.

8 Q So, the pages following that header
9 show the actual logs from November 17, 1987,
10 as shown by the document on the next page if
11 we scroll there. I'll ask if you agree with
12 that. Stop there and see if you agree.

13 A Yes.

14 Q Okay. So if we go to the next page
15 AC_CPUC_0118161, and here you'll see the
16 Bates number in the lower right corner there.
17 And here, if we scroll up, this is a
18 handwritten memo that was included in the
19 SS-29 Well File and dated November 20, 1987.
20 And I could represent that as accurate.

21 Do you see the RA Tracer Survey
22 SS-29 handwritten memo from November 20,
23 1987, Mr. Neville?

24 A Yes, I do. And I have the page in
25 front of me.

26 Q Okay. And you agree that this memo
27 is about an RA Tracer Survey, as shown in the
28 heading at the top of the page?

1 A Yes.

2 Q Based on the date this RA Tracer
3 Survey was performed, November 17, 1987?

4 A Yes.

5 Q Okay. And if you want to take a
6 moment to read it, but does this handwritten
7 page, this is the summary of what happened
8 during the Tracer Survey?

9 A Yes. If I could have -- it
10 shouldn't take long, a minute or so to read
11 it.

12 MR. GRUEN: Sure. Do you want to go
13 off the record, your Honor?

14 ALJ HECHT: Yes. We'll be off the
15 record.

16 (Off the record.)]

17 ALJ HECHT: We'll be back on the
18 record.

19 I think we can pick up with the last
20 question.

21 MR. GRUEN: Thank you, your Honor. I
22 do stand corrected. I believe Mr. Lotterman
23 reminded me off the record, or had clarified
24 off the record, that this is an R/A tracer
25 survey dated November 20, 1987, not
26 November 17, 1987.

27 Q Does that appear accurate to you,
28 Mr. Neville?

1 A Yes.

2 Q And so with that, would you agree
3 the handwritten page is a summary of what
4 happened during the tracer survey?

5 A Yes.

6 Q Okay. Mr. Neville, is this your
7 handwriting?

8 A No.

9 Q Let's go to the page in the file
10 that we're looking at with the Bates stamp
11 AC_CPUC_0116859, if we could, and show that
12 at the bottom.

13 MR. LOTTERMAN: Mr. Neville, it's three
14 pages after the hard page you're looking at.

15 THE WITNESS: Okay.

16 BY MR. GRUEN:

17 Q And you see the Bates stamp at the
18 bottom? I'll wait until you tell me you're
19 there, Mr. Neville.

20 A Okay, I've got it.

21 Q Great. So if we go to the top, we
22 see an interoffice correspondence dated
23 January 8, 1988, subject "SS-29 Shoe Leak."

24 Do you see that?

25 A Yes.

26 Q And here it says in the body of the
27 interoffice correspondence:

28 Temperature surveys run on

1 September 24 and November 12,
2 1987, indicated a possible
3 migration from the storage zone up
4 to the MP. The noise log run on
5 November 17 had noise levels up to
6 500 mV, a noise log run on
7 November 18 after setting a plug
8 had noise levels of about 25 mV.
9 A tracer survey was attempted on
10 November 20 but was scrubbed
11 because of a malfunction in the
12 ejector tool. This contaminated
13 the well and it was several weeks
14 before another attempt could be
15 made. On December 8, a tracer
16 survey was successfully run and
17 indicated gas going away at the
18 MP. I estimate a 95 percent
19 probability that gas is moving up
20 outside the casing of the MP.

21 Did I read that accurately?

22 A Yes.

23 Q I'm sorry, I may have talked over
24 someone, but I just want to clarify. The
25 question I have is did I read that
26 accurately?

27 A Yes.

28 Q Okay. What does "MP" mean there?

1 A So MP is a zone marker and it
2 represents the top of the caprock in Aliso
3 Canyon.

4 Q Okay. At this point with this
5 memo, given what's in here, had SoCalGas
6 proven definitively that a leak existed?

7 A Not definitively. It looks like
8 almost definitively, a 95 percent probability
9 according to the engineer that wrote it.

10 Q Right. But still a possible leak;
11 correct?

12 A Correct. It's not a hundred
13 percent.

14 Q Interoffice correspondence on a
15 possible leak; correct?

16 A Yes.

17 Q Let's go to the bottom of the page
18 if we could. There we see at the cc, it says
19 "N.D. Stevenson" and "well file."

20 Would you agree this means a copy
21 of this document was to go to the well file?

22 A Yes.

23 Q Let's go to the top of the page
24 again. We see there that the memo or
25 interoffice correspondence is from a J.D.
26 Mansdorfer.

27 Do you see that?

28 A Yes.

1 Q Do you know Mr. Mansdorfer,
2 Mr. Neville?

3 A Yes.

4 Q Do you know if Mr. Mansdorfer
5 always cc'd the well file on his interoffice
6 correspondence related to shoe leaks?

7 A No, I don't.

8 Q Moving to the next page and the
9 Bates number at the bottom, it's the Bates
10 page marked AC_CPUC_116870. If we could go
11 to that one. There you go.

12 The Bates number is shown at the
13 bottom of that document as I just read it.
14 If we scroll to the top, this is an
15 interoffice correspondence dated January 14,
16 1988, also with the subject "Aliso Canyon
17 Shoe Leaks."

18 Do you see that?

19 A Yes.

20 Q If you want to take a look, but
21 it's at the first line, this interoffice
22 correspondence talks about four, possibly
23 five, shoe leaks as shown by the first four
24 lines of text; is that correct?

25 A Yes.

26 Q Would you agree it seems like the
27 purpose of the document is to explain why it
28 might not be economical to repair all of

1 these leaks, but rather to allow them to
2 leak? Is that your understanding as well?

3 MR. LOTTERMAN: Objection, calls for
4 speculation.

5 ALJ HECHT: Can you rephrase that
6 question in a more concrete way.

7 MR. GRUEN: Sure.

8 Q To your knowledge, is -- bear with
9 me a moment, your Honor.

10 Let me move on to the next
11 question. Do you see about halfway down the
12 first paragraph the sentence that begins,
13 "Because there is no known way of calculating
14 the leakage rate of shoe leaks"? Do you see
15 where that is in the correspondence?

16 A Yes.

17 Q Do you agree there was no known way
18 of calculating these leaks in 1988?

19 A I do agree with that. I don't know
20 of a way.

21 Q Okay. Let's go to the next page,
22 Bates Number 0117399. I believe that's the
23 Bates number as I just read it. If we go to
24 the top of the page, we see the date there,
25 April 8, 1988, and another piece of
26 interoffice correspondence with the subject
27 line filled in "Monitor SS-29 for Possible
28 Shoe Leak."

1 Do you see all of that?

2 A Yes.

3 Q And this memo appears to, in this
4 case, refer to the Mansdorfer memo or
5 interoffice correspondence that we just
6 reviewed as shown in the first passage of the
7 body of interoffice correspondence.

8 Do you agree?

9 A Yes, it appears to.

10 Q Here if we go to the heading that's
11 "Recommendation," the recommendation --

12 Right there is good. Thank you,
13 Mr. Zarchy.

14 The recommendation is to monitor,
15 but, if the leak gets worse, a workover
16 procedure is provided; is that correct?

17 A Yes.

18 Q What does the procedure include?

19 A The procedure includes the general
20 steps, which is to kill the well, pull the
21 2 7/8-tubing, pull the Baker Retrieva-D
22 packer, pull the liner and squeeze cement at
23 the shoe or use an inflatable packer,
24 consider stimulation as proposed by WelChem,
25 and 5 is to re-install the packer and the
26 tubing.

27 Q Thank you. I appreciate you
28 reading that. I don't mean this to be a rote

1 exercise, but there is some purpose to this
2 for your actual knowledge, sir. Is the
3 procedure to kill a well and pull the tubing
4 a typical next step to locating and fixing a
5 leak?

6 A After a diagnosis of a shoe leak,
7 the next step would be to attempt to confirm
8 by a workover, which would involve the steps
9 listed here.

10 Q Turning to the next page,
11 AC_CPUC_0116857, as shown in the lower right
12 corner, if we scroll to the top, this
13 correspondence is dated April 12, 1988.
14 There's a subject heading here and there is a
15 marking over it so I'll do my best to read
16 it, "Deferral and monitoring Plan for SS-29
17 Possible Shoe Leak."

18 Does that look accurate even with
19 that marking, Mr. Neville?

20 A Yes.

21 Q Okay. The interoffice
22 correspondence recommends deferral of any
23 action until a new monitor log is run in the
24 fall; is that correct?

25 A Yes.

26 Q Would you agree that all of the
27 interoffice communications that we've just
28 looked at for Well SS-29 were written about a

1 possible leak on Well SS-29?

2 A I would agree that these memos do
3 refer to a possible leak. There could be
4 differences to explain why there are more
5 memos here than in SS-25. But the answer to
6 your question is yes, they do. They are
7 memos about a possible leak, although stated
8 at 95 percent at the top of the storage
9 zone -- top of the caprock. I'm sorry,
10 correct that. 95 percent probability at the
11 top of the caprock.

12 Q Thank you. Understood,
13 Mr. Neville.

14 If we go to the Bates stamp on page
15 AC_CPUC_0118168, Mr. Zarchy, if you would. I
16 can repeat that if need be for reference.
17 It's a little bit further down.

18 MR. LOTTERMAN: Mr. Neville, that
19 appears to be about four or five pages past
20 the one we just looked at.

21 THE WITNESS: 8158.

22 BY MR. GRUEN:

23 Q If you'd let me know when you're
24 there, Mr. Neville.

25 A I'm there.

26 Q Okay. Great. You see the Bates
27 number that I mentioned at the bottom right
28 corner of the page. If we scroll to the top,

1 it's dated November 14, 1989. This is
2 another interoffice correspondence for SS-29;
3 correct?

4 A Yes.

5 Q For shoe leak repair?

6 A Yes.

7 Q And looking at this list of work,
8 if we scroll down slightly where it says
9 "Include the following in the rework," would
10 you say that the well would have to be killed
11 to repair the leak here?

12 A I know that it would need to be
13 killed, yes.

14 Q Okay. Let's go to the next
15 interoffice correspondence, which is the page
16 with Bates stamp AC_CPUC_0118149. That's the
17 Bates number there that I just read, I
18 believe. If we scroll up, this is another
19 example of interoffice correspondence dated
20 September 13, 1990, with the subject "SS-29
21 Workover, Aliso Canyon"; correct?

22 A Yes.

23 Q And the first sentence, "The
24 workover to repair the SS-29 suspected shoe
25 leak should be deferred"; is that right?

26 A Yes.

27 Q And that sentence of the paragraph
28 specifically says, again, a "suspected shoe

1 leak." I just want to highlight that.

2 Do you see that?

3 A Yes.

4 Q Okay. Let's go to Bates stamp
5 AC_CPUC_0116831. If we scroll down to the
6 next page just for purposes of identifying
7 the Bates number there, AC_CPUC_0116832. If
8 we go back to the top of the first page, do
9 those pages with those Bates numbers describe
10 interoffice correspondence from July 19,
11 1991, with the subject "Workover
12 Recommendation for SS-29 at Aliso Canyon"?

13 A Yes.

14 Q Okay. If you could look at this --
15 and I can request that we go off the record
16 if you like -- but I want to ask just if you
17 could tell me generally what work is
18 recommended there.

19 Do you want to take a moment,
20 Mr. Neville?

21 A Yes, that will be helpful.

22 ALJ HECHT: We'll be off the record.

23 (Off the record.)

24 ALJ HECHT: We'll be back on the
25 record.

26 Go ahead.

27 BY MR. GRUEN:

28 Q Mr. Neville, can you tell me

1 generally what the work is that's recommended
2 in the interoffice correspondence that we
3 just identified?

4 A Yes. The work involves killing the
5 well, pulling the tubing, cleaning out the
6 wells at the bottom. It involves cutting off
7 what's called a liner, which is the very
8 bottom of the well. This is done to expose
9 some of the 7-inch casing so that it can be
10 perforated. The idea is to perforate the
11 7-inch casing to try to locate by pumping
12 into it this channel which would be causing
13 the shoe leak.

14 It then goes on to conducting some
15 perforating of the storage zone, which is
16 additional work taken in this well in
17 addition to the shoe leak repair. And then
18 it involves rerunning the tubing.

19 Q Okay. Thank you, Mr. Neville. If
20 we could do one more record here to sum up
21 the work performed on SS-29 as I understand
22 it. And, please, if I've misstated that,
23 please do disagree. But if we could go to
24 the Bates stamp AC_CPUC_0118257, you see that
25 as I've just read it shown at the bottom of
26 the document, bottom right corner. If we can
27 go up to the top of the document for a
28 moment. Okay.

1 Here we see in the upper middle on
2 the right side of the sketch there are notes
3 with dates. Why don't we just for purposes
4 of this screen share, if we could, enlarge
5 that where the dates are, enlarge that to
6 show the dates. Thank you.

7 Mr. Neville, I realize you are
8 probably following along with your hard copy.
9 Let me know when you're there.

10 A I'm ready.

11 Q Good. Do you see where we are on
12 the page I just described?

13 A Yes.

14 Q Okay. So the date -- and we have
15 it enlarged on the screen -- but the one
16 that's marked 9-20-1991 to 11-6-91 says,
17 "Workover to repair shoe leak."

18 Do you see that?

19 A Yes.

20 Q So this is when the suspected shoe
21 leak was finally repaired; is that correct?

22 A Yes, it appears to be the case.
23 Yes.

24 Q And just under that note is one
25 dated 11-4-94 to 11-14-94. It's shown on the
26 screen. There's no need to scroll.

27 Do you see where we're looking,
28 Mr. Neville?

1 A Yes.

2 Q And that says, "Converted well from
3 casing flow to tubing flow."

4 Do you see that?

5 A Yes.

6 Q Mr. Neville, why would SoCalGas
7 convert Well SS-29 from tubing and casing
8 flow to tubing-only flow?

9 Do you know?

10 A Yes. Coincidentally, I was the one
11 that did this work in 1994. It was a while
12 ago, but my recollection at the time was that
13 this was 1994. There were several wells in
14 the field that we decided to install some
15 shallow subsurface safety valves. And in
16 order to install a shallow set safety valve,
17 the well needs to be converted to tubing
18 flow.

19 Q Why does a shallow set safety
20 valve -- I'm sorry, why did a shallow set
21 safety valve need to be installed on Well
22 SS-29?

23 A There was some work done -- this
24 was after the Northridge earthquake. There
25 was some work done that identified some
26 possible landslide risk to several wells in
27 the field. As a part of that work, the
28 company chose to install the shallow set

1 subsurface safety valves in a group of wells.

2 Q Mr. Neville -- I'm sorry, I'm
3 hearing some background noise.

4 ALJ HECHT: I do as well. We'll be off
5 the record.

6 (Off the record.)

7 ALJ HECHT: We'll be back on the
8 record.

9 We went off the record due to some
10 strange beeping which has now stopped.

11 MR. LOTTERMAN: Mr. Gruen, would you
12 mind restating the question.

13 MR. GRUEN: Yeah.

14 Q Generally we were on the topic of
15 shallow surface safety valves, a shallow
16 surface safety valve and why it was required
17 to be installed in Well SS-29.

18 Did I understand that correctly,
19 where we were going? Is that your
20 understanding as well, Mr. Neville?

21 A Yeah. I think you asked why it was
22 installed. It was -- I don't believe -- I
23 would have to look at the record, but I don't
24 know -- I know it wasn't a requirement. It
25 wasn't a regulatory requirement. It was
26 based on a study that was done in the field.
27 This study recommended that some wells have
28 subsurface safety valves set.

1 Q Okay. Was it an option for
2 SoCalGas -- let me ask it this way: Why
3 didn't SoCalGas convert Well SS-25 from
4 tubing to casing flow together to tubing flow
5 only?

6 A Why didn't the company convert
7 SS-25?

8 Q To tubing-only flow, yes.

9 A Well, it would be based on the
10 results of that study that was done. And not
11 seeing -- not seeing the study, I can't -- I
12 mean I would presume that that well wasn't --
13 wasn't of concern with the risks of landslide
14 as this SS-29. So, you know, I'm
15 speculating. I haven't seen the study. But
16 the wells that were converted to tubing flow
17 were wells that were affected by a potential
18 landslide.

19 Q Mr. Neville, prior to October 23,
20 2015, do you know how many wells at Aliso
21 were converted from casing flow and tubing
22 flow to tubing-only flow like SS-29 was?

23 A I'll say several.

24 Q More than 10 do you know?

25 A No.

26 Q I'm sorry. No, not more than 10
27 or, no, you don't know?

28 A Not more than 10.

1 Q More than 5?

2 A It was in the 4 to 7 range.

3 Q Mr. Neville, after looking over all
4 of these interoffice correspondence memos in
5 the SS-29 well file about possible and
6 suspected leaks, do you still believe the
7 reason no memos like this appear in the SS-25
8 well file is because there were no leaks in
9 Well SS-25?

10 A It's difficult, to be honest, to
11 sit here today to try to explain why there
12 were interoffice memos in one well and not
13 the other with regard to potential shoe
14 leaks. The difference could be due to the
15 potential higher likelihood of the leak
16 occurring. I did see 95 percent. It looked
17 like in SS-29 in a general sense there was
18 more concern because the leak was -- the
19 noise was found to be as high as the MP.

20 However, there's different people
21 involved. This is in 1988. SS-25, the shoe
22 leak investigations were I think in 1984. So
23 I can't positively give a -- I don't -- you
24 know, I don't know the exact reason, but
25 those could be factors.]

26 Q Okay. If we could switch to the
27 following line of questions regarding
28 possible repair of the SS-25 tubing.

1 So if we could bring up Exhibit
2 SED-297, and this is entitled, on the title
3 page, "SS-25 Tubing Issues." And this is a
4 set of documents provided to SED by SoCalGas.
5 So we combined the documents in chronological
6 order.

7 And I -- I want to ask you at this
8 time: Did you have a chance, an opportunity,
9 to review this file, Mr. Neville?

10 A I -- I have not reviewed it. I --

11 Q Okay. We'll see if we can
12 establish foundation. We'll -- we'll go
13 through and see if you recognize some of this
14 as we do this. Yeah. It's a -- it's a
15 relatively short file compared to what we've
16 done. So let's -- let's see if we can just
17 push through.

18 The -- let's go to Bates number
19 AC_CPUC_0206252.

20 MR. LOTTERMAN: Mr. Gruen, I think this
21 will go faster if I could put the hard copy
22 in front of Mr. Neville again.

23 MR. GRUEN: Understood.

24 No -- no objections, your Honor.

25 ALJ HECHT: Agreed. We'll be off the
26 record.

27 (Off the record.)

28 ALJ HECHT: We'll be back on the

1 record.

2 We are going to take a short
3 ten-minute break, coming back at 3:20, so
4 that the witness can familiarize himself with
5 this new document. When we get back, we will
6 pick up with the cross-examination. The day
7 is getting towards the end, and we do have
8 some housekeeping to do at the end of the
9 day. Everybody back at 3:20.

10 We'll be off the record.

11 (Off the record.)

12 ALJ HECHT: We'll be back on the record
13 after our short afternoon break.

14 And I do not remember the question,
15 but I'm hoping that either Mr. Gruen or
16 Mr. Neville does.

17 MR. GRUEN: Yes, your Honor. I can --
18 I can go from here.

19 Q Mr. Neville, do you recall we were
20 asking about Exhibit 297? And I believe it's
21 up here. We refer to the -- on the screen
22 share, the document that's shown on screen
23 share, Bates number -- the page with Bates
24 number AC_CPUC_0206252. Do you see that?

25 A Yes.

26 Q And have it in front of you --

27 A Yes.

28 Q -- as well for -- okay.

1 Were you able to familiarize
2 yourself with this set of documents while we
3 were on break, Mr. Neville?

4 A Yes. They appear to be documents
5 from the well invoice file.

6 Q Okay. And if we look at the page
7 that we have here, and if we go to the top of
8 the page, and this is dated 9-18, 1979 over
9 on the left of the document, do you see where
10 I am?

11 A Yes.

12 Q This is for well SS-25. Correct?

13 A Yes.

14 Q And do you see there, under the --
15 in the -- the body, toward the bottom of the
16 screen share of this page, do you see the
17 term "jarred" on the second line of the
18 description of work?

19 A Yes.

20 Q So in that context, as we're
21 reading it -- I'll just read it for the
22 record.

23 "Rigged up, ran 2:347 gauge ring to
24 tight spot at 1345 feet, jarred through and
25 ran to DS-1 nipple at 8427 feet, rigged
26 down."

27 Did I read that accurately?

28 A Yes.

1 Q And in that context, what does the
2 term "jarred" mean?

3 A So a gauge ring is just under the
4 inside diameter of tubing; so it's very close
5 in diameter. So it's actually used to make
6 sure that the -- that tools run after it
7 can -- can get through the tubing and all the
8 way to the bottom. That's the purpose of a
9 gauge ring.

10 So when this -- this gauge ring got
11 to a depth of 1345, it hit this -- what's
12 called a tight spot. And what wireline
13 operators do to get through tight spots like
14 this is they -- they have these jars on their
15 tool string that can kind of slam the tool up
16 or down and jar it through or jar it back
17 out. It's -- the jars are on there for the
18 very purpose of, you know, what if the gauge
19 ring hits a tight spot.

20 Q Okay. Would you agree, after
21 having reviewed this, that almost every page
22 of this document mentions jarring or jars?

23 A Yes. I'm into about four pages,
24 and I -- I see -- oh, five pages, jarring.
25 Yes, there's a lot of jarring.

26 Q Okay. If we look at the page that
27 is AC_CPUC_0206219, if you go to that page,
28 and that's shown in the bottom right corner

1 there, and if we scroll up to the top, the --
2 to show the date, it shows there, on the
3 right, the date is the 4th of November 1981.
4 Is that correct, Mr. Neville?

5 A Yes.

6 Q Do you see -- you -- sorry for
7 talking over you. I just wanted to show you
8 where I was looking.

9 And I believe you said you saw the
10 date of November 4th, 1981. Is that right?

11 A Yes.

12 Q Okay. And then, in the middle of
13 the page, if we go down there, we see
14 "Attempted to set B.H. Otis 2 1/2 choke,
15 couldn't get by Camco safety system." Do you
16 see that?

17 A Yes.

18 Q Okay. By 1981, hadn't the Camco
19 safety system already been removed?

20 A Yes, I believe that's the case.
21 I -- I believe it was removed in the 1980s,
22 if I recall. And I --

23 Q Okay. And just -- sorry. I didn't
24 mean to crosstalk on you. Were you done with
25 your answer?

26 A Yes, I believe you're correct.
27 By -- by November 4th, 1981, the Camco valve
28 was out of the housing.

1 Q And we're talking about the Camco
2 safety valve, the subsurface safety valve.
3 Is that right? That's one in the same?

4 When you say, "Camco safety valve,"
5 in this case, that means subsurface safety
6 valve for SS-25?

7 A Yes.

8 Q Okay. So what's -- what does this
9 mean, this sentence here?

10 A So there's -- as I -- I think
11 discussed earlier, there's a -- a profile on
12 the very bottom of the well where a
13 mechanical plug can be set to isolate the
14 well from the storage zone. The -- that
15 was -- that profile was also used for setting
16 chokes. And a choke is similar to a plug,
17 except it's got a small hole in it to -- to
18 restrict flow rate. It use -- it's used to
19 control flow. So this wireline run was an
20 attempt to get that choke through the safety
21 system down to the profile where the choke
22 would be set.

23 Q Okay. Scrolling down to the page
24 with the Bates stamp of -- I'm sorry. Okay.

25 Did SoCalGas ever remedy the
26 problem with the Camco subsurface safety
27 valve and the tubing of not being able to --
28 to get by the Camco SV nipple?

1 A I'll have to read the invoices
2 following the -- the attempted try where --
3 where -- the one that we just discussed
4 that -- to see how that was remedied. So
5 it -- it's going to take me a -- a few
6 minutes to read through the -- the next
7 several invoices to see how the --

8 Q Okay.

9 A -- (inaudible).

10 Q Can -- can -- okay. Understood.
11 Maybe what we could do, if we could ask you
12 to review that tonight, and revisit that
13 question tomorrow morning toward the end of
14 your cross, and if I could move on and --
15 okay.

16 MR. LOTTERMAN: That's fine with --
17 Mr. Gruen, I have a question for you, though.
18 Is -- is Exhibit 297 a complete list of the
19 SS-25 well file invoices?

20 MR. GRUEN: I will have to get an
21 answer to you on that, as well. And I'm
22 gleaning from that that SoCalGas would like a
23 complete set in the record?

24 MR. LOTTERMAN: No. I'm just -- I
25 suspect Mr. Neville may have to look beyond
26 Exhibit 297, if 297 doesn't include all the
27 invoices. I was just trying to figure out
28 how -- how large a homework assignment he

1 had.

2 MR. GRUEN: It is -- I'm getting that
3 it's not a complete thing. But, what we can
4 do -- actually, why don't we address this in
5 housekeeping? I think we've got a way
6 forward on this, as well --

7 MR. LOTTERMAN: Okay.

8 MR. GRUEN: -- maybe, if I could
9 continue with cross.

10 MR. LOTTERMAN: Sounds fine. Thank
11 you.

12 MR. GRUEN: Yeah.

13 ALJ HECHT: Okay. Go ahead.

14 MR. GRUEN: Thank you.

15 Q Mr. Neville, as I understand it
16 from prior discussion, just a -- to move
17 forward, SoCalGas has killed other wells and
18 removed tubing for repairs on other wells.
19 Is that right?

20 A Yes.

21 Q So here, with this problem we've
22 just discussed, why didn't SoCalGas kill
23 SS-25 and repair or replace the tubing?

24 A Well, I -- I -- I really do need to
25 finish my review to see if, in fact, they
26 were able to remedy this issue with the --

27 Q Fair enough. I -- I -- sorry for
28 crosstalk. I see now that it's related to

1 the review. Okay. We can handle that in
2 housekeeping. Understood.

3 Your Honor, I think at this time,
4 it may be a good idea, because I believe we
5 have six minutes left until a hard stop --

6 ALJ HECHT: Yes.

7 MR. GRUEN: -- I -- okay. I think it
8 may be a good idea if we -- it seems it might
9 be a good idea if we end the cross for the
10 day at this point. I don't see any lines
11 that we can do further that would fit.

12 ALJ HECHT: All right. I think that
13 that is a fine idea, and we will do the
14 housekeeping now.

15 So I think that Witness Neville
16 should be done for the day, and we could have
17 a conversation of housekeeping.

18 We'll be off the record for just a
19 minute while I get my notes in order.

20 (Off the record.)

21 ALJ HECHT: We'll be back on the
22 record.

23 While we were off the record, I got
24 my notes together, and went through a short
25 list of things that I want to discuss during
26 housekeeping today to prepare for tomorrow
27 and Friday.

28 The first issue is the schedule for

1 the hearings themselves, and particularly,
2 the cross-examination.

3 So does SED have an update on that?

4 MR. GRUEN: Yes, your Honor. I recall
5 your question, your Honor's question,
6 yesterday about if there was a -- we
7 anticipated a radical departure from the
8 schedule as of the end of the day today.
9 We -- we do not see a radical departure, in
10 light of the cadence of cross.

11 In terms of our estimate for
12 Mr. Neville, just to alert all other parties,
13 my best estimate may be we're looking at an
14 hour, perhaps two hours or so, to wrap up
15 with Mr. Neville, given the pace that we've
16 been going. That's -- that's about our best
17 estimate for tomorrow.

18 And then, in terms of the rest of
19 the schedule, it's -- our best assessment
20 is, at this time, that the other
21 cross-examination estimates for the other
22 witnesses are still our best estimates.

23 ALJ HECHT: Thank you. So that makes
24 me think that you will need tomorrow morning
25 for Witness Neville, and then there will be
26 Public Advocates Office cross of Witness
27 Neville, and then redirect. The schedule we
28 last received had Hower & Stinson starting on

1 Friday afternoon. It seems possible that
2 that will not be happening, but I guess we'll
3 see how it goes. It depends on the time for
4 redirect.

5 Does anybody else have thoughts or
6 concerns about that schedule?

7 MR. LOTTERMAN: Your Honor, Tom
8 Lotterman. On that issue, I think I suspect
9 that we will not need a full day for
10 redirect, if that's helpful.

11 ALJ HECHT: That is helpful. Thank
12 you. So that gets us back, I think, to what
13 we last received from SED, assuming that I am
14 looking at the most current set of estimates.

15 Any other comments? I feel that
16 Ms. Bone might be speaking, but --

17 MS. BONE: I just wanted to add that I
18 believe that we'll -- we'll take about an
19 hour for the witness tomorrow.

20 ALJ HECHT: Okay. Great. Thank you.
21 Okay. So that gives us, I think, a better
22 idea of what tomorrow and Friday will look
23 like, and I'm not going to go beyond that
24 right now.

25 The second thing is an update on the
26 Boots & Coots witnesses. I believe that the
27 subpoena was issued.

28 Is there any update on whether they

1 will appear, who will represent them,
2 anything along those lines, Mr. Stoddard?

3 MR. STODDARD: Yes, your Honor. Thank
4 you. Unfortunately, we don't have any firm
5 update at this time. We remain in -- just
6 to -- as kind of a reminder to bring us back
7 up to speed, we filed a petition to enforce
8 subpoenas compelling testimony in Harris
9 County, Texas on April 20th. The subpoenas
10 were served on both witnesses. We've been in
11 communications with counsel for both Boots &
12 Coots as well as counsel for Cudd, which is
13 the entity that employs Mr. Walzel. And, you
14 know, we -- we've kind of remained in contact
15 with them as frequently as we can, and asking
16 for updates from them as frequently as we
17 can. I'd hoped to have further discussions
18 tomorrow, but I also hoped to speak with them
19 today. So it's just going to have to go day
20 by day, and I will certainly provide firm
21 updates as I have them. We've continued to
22 express, obviously, in -- our interest having
23 them here, and are taking legal steps to
24 ensure that that happens.

25 ALJ HECHT: Thank you. That's helpful.
26 And I think that that's really all I have on
27 that issue.

28 Are there any concerns from other

1 parties?

2 (No response.)

3 ALJ HECHT: No. Now --

4 MR. GRUEN: Not at this time, your
5 Honor, no.

6 ALJ HECHT: All right. That being the
7 case, we will revisit that briefly, at least,
8 tomorrow and/or whenever there is a firm
9 update to share. So we can move on from
10 that.

11 MR. STODDARD: Sorry, your Honor.

12 ALJ HECHT: Go on.

13 MR. STODDARD: If -- if -- if we're
14 going to revisit it tomorrow, just given how
15 the timing has gone, I would suggest we slot
16 it for the end of the day; otherwise, I can
17 let you know when I have an update. But, I
18 doubt I will have much of an update in the
19 morning.

20 ALJ HECHT: That makes perfect sense.
21 We can check in very quickly on that at the
22 end of the day. Thank you.

23 Then we have a few sort of
24 outstanding issues related to exhibits from
25 today's cross. One is the review of the well
26 file invoices, which I'm going sort of in
27 backwards order. That was the last one that
28 we discussed. It sounded like Mr. Gruen had

1 a -- a thought on that.

2 Can you please proceed?

3 MR. GRUEN: Yes, your Honor. I --
4 indeed, I may be able to wrap up both of the
5 outstanding housekeeping items that your
6 Honor raised at once. And I understood the
7 other one was the discussion that we had
8 about the stipulation of well SS-25 in the
9 order that it was received from SoCalGas.
10 And I think there's maybe an outstanding
11 question as to whether SoCalGas would also
12 stipulate to including into the record the
13 well file for well SS-29 in the same order
14 that it provided.

15 So I can clarify that well SS-25 did
16 not include the invoices the way we used it
17 in cross today. However, if SoCalGas would
18 stipulate to well SS-25 going into the
19 record, SED is willing to reorder it and
20 provide it in the order that it was received
21 from SoCalGas, including the invoices which
22 were the nature of the exhibit that we just
23 used to cross-examine Mr. Neville.

24 And it's the same offer that we
25 could do if SoCalGas would stipulate to well
26 SS-29 going into the record; we can reorder
27 it to show that it's the exact order that we
28 received it from SoCalGas.

1 And SED can provide it to those --
2 both documents to SoCalGas for review to
3 confirm that -- that they have been provided
4 accurately.

5 ALJ HECHT: I have a clarifying
6 question before we go to SoCalGas, which
7 presumably will want to respond.

8 Does that mean that the new numbers
9 that were referred to today in the
10 cross-examination will not match the ones in
11 the exhibits? Because that is a bit messy,
12 and it's something that I think my colleague
13 and I would need to consult about.

14 MR. GRUEN: Yeah, it -- it would, your
15 Honor. And to the extent it facilitates
16 things, what we could do is propose something
17 like the same number, but the -- the -- the
18 letter "R" next to it to show revised, or as
19 your Honors see fit. We could do something
20 like that, if it would facilitate clarity in
21 the record.

22 ALJ HECHT: I think that something
23 either like that or an index that matches
24 things would be helpful to me, personally.
25 However, we can't resolve this before going
26 to SoCalGas.

27 And I'm guessing Mr. Stoddard wants
28 to speak.]

1 MR. STODDARD: Yes, your Honor. Thank
2 you. It's hard to talk about it in the
3 abstract. It might be helpful to see the
4 proposed exhibits at the time, once SED has
5 them, and then we can see if there's an
6 issue.

7 And I have to go back and confirm,
8 but if we are referring to Bates numbers and
9 the reordered documents as they were
10 produced, the Bates numbers may be the same.
11 But, again, it might be easier once we can
12 see it and confirm that it's the as-produced
13 version and then we can confirm stipulating
14 to those documents.

15 ALJ HECHT: Yes, Mr. Gruen.

16 MR. GRUEN: Your Honor, I can confirm
17 the accuracy of what Mr. Stoddard is saying.
18 Our understanding is that the Bates numbers
19 would indeed be the same. Just the ordering
20 of them would change.

21 ALJ HECHT: That is helpful for me, at
22 least, Mr. Stoddard.

23 MR. STODDARD: Nothing more.

24 ALJ HECHT: Okay. I think that that's
25 how we'll proceed. We'll have to check in on
26 this again. I assume that tomorrow any cross
27 that couldn't be completed today on those
28 will be possible, since tomorrow is the last

1 day that we are scheduled to have Witness
2 Neville, except maybe some redirect on
3 Friday.

4 MR. GRUEN: Your Honor, I'll offer
5 something just to the extent it helps
6 Mr. Neville and facilitates things. We don't
7 have any more cross-examination planned
8 related to the SS-25 or SS-29 well files. So
9 rest-assured on that, and we'll move on, on
10 the cross.

11 ALJ HECHT: Okay. Anything further on
12 the invoices or the exhibits and the
13 structure and formatting and order?

14 (No response.)

15 ALJ HECHT: No. Seeing none, we will
16 continue, and that's the issue of the renewed
17 motion to quash which I received this
18 afternoon around one o'clock. It appears
19 that SED served it after lunch.

20 We'll be off the record.

21 (Off the record.)

22 ALJ HECHT: We'll be back on the
23 record.

24 While we were off the record, I said
25 a few things about reviewing the motion to
26 quash that we received from SED today around
27 one o'clock. This is the renewed motion that
28 was authorized in the ALJ ruling that went

1 out last week granting SoCalGas' motion for
2 reconsideration. My colleague and I have
3 reviewed this. Judge Poirier and I have
4 considered what is in it.

5 Most of the arguments are not new.
6 It acknowledges that there should not be a
7 privilege issue related to Mr. Holter being a
8 percipient witness. To the extent that that
9 filing expressed concerns that the intention
10 was actually to ask questions that go beyond
11 his being a percipient witness, I would note
12 two things. And one is we have approved it
13 as a percipient witness and that's what we
14 expect. And arguments that that may not be
15 what was intended are not relevant to what we
16 have approved. And we expect people to abide
17 by that instruction. So, that's one.

18 The other thing is, to the extent
19 that there may be questions that are asked
20 that do involve some potential privilege or
21 anything like that, which I would not expect
22 would be the case if he is just a percipient
23 witness, but if there are, those are things
24 that would be dealt with on a case-by-case
25 basis. So I appreciate that those points
26 have been made, but they are what they are.

27 And I would reiterate something that
28 I said off the record. The second argument

1 in the motion is that this does not, in SED's
2 view, accurately weigh the likelihood of
3 finding admissible evidence, but again the
4 burden on SED of doing this, let me assure
5 you, we weighed all of those factors and we
6 believe that this is what is required.

7 So that is not going to change. The
8 ruling stands. The renewed motion is denied
9 with one caveat, which is knowing that this
10 will be simply a percipient witness, it seems
11 reasonable to us not to allow it to go on
12 forever and to impose some sort of time limit
13 on it. And the time limit that I am thinking
14 of is six hours, which I recognize is much
15 longer than SED was asking for, but I think
16 it needs to be a long enough period of time
17 that this is a meaningful opportunity for a
18 deposition. So I am going to ask for
19 comments on that aspect of it.

20 Yes, Mr. Stoddard.

21 MR. STODDARD: Thank you, your Honor.

22 As I recall, a standard kind of
23 single-day deposition under the code is seven
24 hours. And I would simply ask for
25 consideration for a single-day deposition
26 which would be the standard practice.

27 ALJ HECHT: Is there a response from
28 Mr. Gruen?

1 MR. GRUEN: At the risk of repeating,
2 your Honor's well aware where our initial
3 request was 90 minutes, and that is
4 consistent with Commission precedent as we've
5 identified.

6 So, I understand SoCalGas' request
7 for having a standard deposition be seven
8 hours, but there's precedent on the other
9 hand for reducing it to less time as well.
10 So I would ask for consideration that it be
11 reduced slightly.

12 ALJ HECHT: All right. I am going to
13 take this aspect under advisement and
14 Judge Poirier and I will discuss the length
15 one more time and get back on that tomorrow
16 with the length. I can tell you that I do
17 not expect that it would be significantly
18 under the six hours. The arguments about 90
19 minutes had already been considered and we
20 are trying to find a period of time that is
21 reasonable for the useful deposition that
22 provides adequate due process. And this is
23 where we are right now, but we can revisit
24 that and say tomorrow whether it will be six
25 or seven.

26 Are there other comments? Yes,
27 Mr. Stoddard.

28 MR. STODDARD: Yes, your Honor. Thank

1 you.

2 And with the caveat that because we
3 have been in hearing today I haven't actually
4 had a chance to review the motion and so if I
5 say something, just please note that.

6 But there were a couple of other
7 items related to the deposition. I know one
8 of the next steps here is we need to provide
9 a date and I think we are working on that.

10 One other item, however, is the
11 subpoena for the deposition included a
12 production of documents for purposes of
13 deposition. And we just wanted to make sure
14 that -- and I believe it was five days in
15 advance of the deposition, and so we wanted
16 to make sure that when we schedule it, it
17 will allow adequate time, in our view a
18 reasonable time rather, for SED to make that
19 production five days in advance of the
20 deposition.

21 And then separately, given the high
22 likelihood of, you know, the numerous kind of
23 motions on this issue and the arguments and
24 the high likelihood of objections, SoCalGas
25 would like to request that there be -- one of
26 your Honors possibly be available at least by
27 phone to rule on disputes as they come up.

28 ALJ HECHT: Thank you. Both of those

1 issues are things that we have discussed but
2 not come to a complete conclusion on.

3 The points about the documents, I
4 would ask Mr. Gruen because they do address
5 their belief about what documents would be
6 appropriate for a percipient witness, at
7 least to some extent in their ruling. And I
8 apologize for ruling on their motion before
9 you've had a chance to read it. I am anxious
10 to get this settled.

11 Mr. Gruen.

12 MR. GRUEN: I don't have anything to
13 add to the motion, your Honor. I think it
14 does address the point that Mr. Stoddard is
15 raising now and perhaps just for purposes of
16 clarity rather than restating or being at
17 risk where there is a misunderstanding of
18 what the issue is, maybe it would be useful
19 to give Mr. Stoddard an opportunity to review
20 the motion.

21 ALJ HECHT: Yes. I have put
22 Mr. Stoddard at a disadvantage. I can
23 certainly hold off on the rest of this
24 discussion until tomorrow.

25 The scheduling and whether one of us
26 would be available, the scheduling and having
27 some time limits that accommodate having this
28 done expeditiously but allowing that five

1 days in advance, those are things that I
2 think that we could do today and no one would
3 be at a particular disadvantage, but if you
4 don't agree, I have no problem with waiting.

5 As far as having one of the ALJs
6 available, that is something that we will
7 have to discuss and get back to you about.

8 MR. STODDARD: Your Honor, I think we
9 can proceed with discussions. I don't feel
10 particularly disadvantaged at this time, but
11 I can review this evening if we can discuss
12 these logistical items, I think.

13 ALJ HECHT: All right. Thank you.
14 That is -- yes, Mr. Gruen.

15 MR. GRUEN: Your Honor, the concern I
16 have is there -- just with the timing and in
17 terms of I think we just may need some time,
18 since we're focusing on hearings at the
19 moment. I believe the ruling contemplated
20 and maybe instructed -- your Honor's ruling
21 initially from just prior to hearings
22 instructed the deposition occur after
23 hearings. And perhaps to that end and in the
24 spirit of that proceeding with preparation
25 all around for the deposition of Mr. Holter,
26 if we could commence with that and put our
27 efforts toward that after hearings begin, it
28 might facilitate a more-informed discussion

1 of logistics. But we understand the ruling.
2 We are certainly prepared to move forward
3 with preparation for that deposition.

4 ALJ HECHT: I believe that the actual
5 wording was something like "on a basis of not
6 interfere with hearings." And that did
7 indeed contemplate that it would not be
8 during hearings or within a couple of days
9 after hearings on the assumption that people
10 would want time to prepare. "Does not
11 interfere with" was not well-defined in the
12 document. So that's my clarification.

13 Do we have any thoughts from
14 Mr. Stoddard?

15 MR. STODDARD: Thank you, your Honor.
16 No. I think that, again, we are working on
17 selecting dates and we understood the ruling
18 to say what you say it said, it shouldn't
19 interfere with hearings, and so we're keeping
20 that in mind in our selection of dates.
21 However, we would like the deposition to
22 happen as quickly as possible with that
23 understanding, which may mean that, you know,
24 both on our end and on SED's, it's going to
25 be, you know, still be an expedited schedule.

26 ALJ HECHT: Thank you. The other day
27 when this was raised, I think it was Monday
28 morning during housekeeping, I think that SED

1 made a request that this happen within a few
2 weeks of the end of these hearings. Am I
3 remembering that correctly, Mr. Gruen?

4 MR. GRUEN: You are, your Honor. Part
5 of the reasoning for that, we've done -- in
6 the event that your Honors would stick to the
7 ruling, we've done some coordination with
8 Mr. Holter to check for his availability. He
9 has some limited availability.

10 So, what I might propose is, to the
11 extent we cannot interfere with hearings
12 consistent with what your Honor just
13 explained now and fit within Mr. Holter's
14 schedule, we can coordinate with SoCalGas
15 shortly after hearings finish, in order to
16 see if there's a suitable but expeditious
17 time that would fit the schedule.

18 ALJ HECHT: Yes. Any response to that?

19 MR. STODDARD: None, your Honor.

20 ALJ HECHT: All right. I agree that it
21 should be done pretty expeditiously. We are
22 also looking at having to reset our briefing
23 schedule and at the possibility that if
24 something comes up in the deposition that
25 SoCalGas believes requires additional
26 evidentiary hearings, reminder they would
27 have to make a motion for that and explain
28 why they believe that those are needed and we

1 would have to rule on that and schedule that
2 additional day or whatever of hearings. And
3 those things would take some time and they
4 would also affect when we have the briefing.

5 So I would like this to be done
6 within a few weeks of the end of hearing,
7 ideally three weeks or so, and as I said, not
8 after -- not in the immediate, you know,
9 three or four days right after the hearing.
10 Is that clear?

11 MR. GRUEN: Yes, your Honor.

12 MR. STODDARD: (Affirmative nod.)

13 ALJ HECHT: It appears that that is
14 clear. So I think that that is how we will
15 proceed. That does remind me that we have
16 not yet set those briefing dates, and my
17 expectation is that we will set them soon. I
18 would love to know when the deposition is or
19 if we feel this is going to go longer, but my
20 guess is we are probably going to set
21 briefing dates on the assumption that there
22 will not be more hearings and we can always
23 of course adjust it, if that changes.

24 I think we said before the end of
25 the last set of hearings that we would make
26 sure that people got at least the amount of
27 time that they would have gotten under the
28 original briefing schedule and that remains

1 the same.

2 Are there any questions?

3 MR. GRUEN: Your Honor, just if I
4 understand right, that contemplation was
5 approximately one month for opening briefs
6 and one month for reply. I may not have it
7 down to the day, but am I tracking the
8 approximate dates?

9 ALJ HECHT: I honestly do not recall.
10 I thought it was slightly longer than that,
11 but I will check.

12 MR. GRUEN: Okay.

13 ALJ HECHT: Yes, Judge Poirier.

14 ALJ POIRIER: I want to raise a matter
15 once we're done with this one issue.

16 ALJ HECHT: Yeah. I think that was
17 kind of all I wanted to discuss on this, with
18 the caveat that we will revisit tomorrow the
19 length of the deposition, knowing that it
20 will be within approximately the range of six
21 hours.

22 All right. If there is nothing else
23 on that, then Judge Poirier, please.

24 ALJ POIRIER: Just one minor
25 housekeeping matter, too, is just for the
26 parties to start organizing the exhibit
27 numbers identified in advance of them being
28 moved. We've got quite a few. So I want to

1 see if we can start that process, since we'll
2 be doing it this week. Okay.

3 MR. GRUEN: Understood, your Honor.

4 ALJ POIRIER: That's all I have.

5 ALJ HECHT: Great. Agreed. Thank you.

6 Are there any other issues or concerns that
7 we should address under housekeeping today
8 before we adjourn for the day?

9 MR. GRUEN: No.

10 ALJ HECHT: We have already gone past
11 4:00 p.m., so I am going to let everybody go.
12 We'll see you tomorrow at 10:00 a.m. We are
13 adjourned.

14 (Whereupon, at the hour of 4:06
15 p.m., this matter having been continued
16 to 10:00 a.m., May 6, 2021, virtually,
the Commission then adjourned.)]

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