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 the Commission's Own Motion into the Operations and Practices of Southern California Gas Company with Respect to the Aliso Canyon storage facility and the release of natural gas, and Order to Show Cause Why Southern California Gas Company Should Not Be Sanctioned for Allowing the Uncontrolled Release of Natural Gas from its Aliso Canyon Storage Facility. (U904G)	)	EVIDENTIARY HEARING Investigation 19-06-016

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I N D E X

VIRTUAL PROCEEDING

MAY 6, 2021 - 10:02 A.M.

* * * * *

DAN NEVILLE,

resumed the stand and testified further as follows:

ADMINISTRATIVE LAW JUDGE HECHT: We'll be on the record.

The Commission will please come to order. I am going to say these things for the second time because I said them off the record. This is May 6th, and these are the evidentiary hearings for Investigation 19-06-016. We are continuing with the cross-examination of Witness Neville. We got a late cross-examination exhibit from the Public Advocates Office, and we are not going to worry about the lateness of that. And I think I've already confirmed that everybody is ready.

So now, Mr. Gruen, you may begin.

MR. GRUEN: Thank you, your Honor.

CROSS-EXAMINATION (resumed)

BY MR. GRUEN:

Q Good morning, Mr. Neville.

A Good morning, Mr. Gruen.

Q If we could move to your opening

testimony, Exhibit SoCalGas-1, and go to page 1.0009, which is also marked as page 8 at the bottom. And I'll wait for a moment for both of you in the screen share to go there. And the screen share is now showing the Bates number -- the page with Bates No. SoCalGas 1.0009, and if you could let us know when you're there as well on your hardcopy?

A Yes, I have it.

Q Okay. And if we turn to page 8, lines -- I'm sorry. Excuse me -- lines 4 to 18. So here you discuss -- if I could caption it from line 6 where you say, "The surface safety system" -- excuse me -- lines 5 and 6, "The surface safety system consisted of fail-close pneumatic operated valves located on the wellhead and designed to close by any of the following methods."

Do you see where I'm looking?

A Yes.

Q So when you talk about fail-close pneumatic operated valves, those would close the well at the top in the event that gas was leaking at the wellhead of the well. Would that be an accurate way to describe them?

A Right. It would -- the closing is done at the top of the well if these conditions are met, one of them including a

leak in -- in the flow laterals and part of a section of a wellhead.

Q Okay. So if there's a -- I just want to clarify. So you're saying that -- I think I need to unpack that a little bit -- a leak in the flow laterals, are these designed to open and close if there's a leak in the well like what happened in Well SS-25?

A No.

Q Okay. Let me see if -- so let me follow-up with that. So the methods -- maybe just to run through the testimony a little bit, the methods that you talk about for the wellhead being designed to close and open, those are shown on lines 8 through 16; is that correct?

A Yes.

Q And then lines 17 through 18, you say -- you conclude:

> The foregoing practices allowed SoCalGas to effectively mitigate leaks in the wellhead and surface piping of UGS wells.
>
> Do you see that?

A Yes.

Q Okay. Let's look at the -- the next exhibit. It's Exhibit 283.

A Can I offer a clarification?

Q Of course.

A The valve -- the valve may close on a subsurface leak, but the -- they are designed to close if -- if a threshold pressure is reached on the flow lateral itself. So it's a minor clarification. But they are designed to shut-in the well if a certain threshold pressure is breached on the flow lateral, and that would normally be due to a leak in the flow lateral itself.

Q Okay. And maybe just for the record, could you clarify what you mean by a flow lateral?

A That's the piping that's connected to the wellhead and runs to the processing part in the Aliso Canyon facility before it goes into the -- before it's metered in these -- the facility. So the lateral piping is piping on the well site.

Q Okay. So it's above-surface horizontal piping, if you will? Is that an accurate way to characterize it?

A Yes. That's a good way to characterize it.

Q Okay. So your clarification is that the -- these pneumatic valves may still close if you've got a subsurface leak like what happened in SS-25. And -- but they are

designed to close or will close if you've got a leak on these flow laterals. Am I tracking that right?

A Yeah.

Q Okay. And why may they close if you've got a subsurface leak like what happened in SS-25?

A Well, it just all depends on the pressure in the line. If the pressure drops to a threshold value, which I don't know offhand, due to a leak, then they could potentially close.

Q Do you know if the pressure of the flow laterals dropped below that threshold when SS-25 experienced the incident?

A I don't know.

Q Okay. Let's look at Exhibit SED 283. And if we could discuss -- look at the -- the SS-25 well pressures here. Do you recognize this document, by the way?

A Would you mind scrolling to the top.

Q Sure.

A I don't recognize the document, no. I note that the data is post-October 23rd.

Q Okay. Are you familiar with the data that's shown on this document?

A I am familiar with what the data

represents.

Q Okay. Let's see if we can go through this then with that understanding. So if we could go to -- if we could scroll to the bottom of this document, Mr. Zarchy, and here, if we could go to -- ah, it's the next one that has Bates -- I'm sorry. There was a line. So it's Bates No. AC_CPUC_0000100. And if we scroll back up.

So would you agree that the second line here included a date -- a time of 4:00 p.m. on October 23rd, 2015?

A Yes.

Q And then row 3 we're at 4:10 p.m. on October 23rd, 2015. Do you see where I am?

A Yes. On the blue -- the part highlighted in blue?

Q As well as the row just below it, correct. Do you see where I am?

A Yes.

Q Okay. And in row 3 just below the blue highlighted row, the note there says:

> We initially suspected an up/down wellhead seal leak between a 7 inch casing and the 11-3/4 inch casing called Cameron.
>
> Do you see that?

A Yes.

Q Do you know who Cameron is?

A Yes. Cameron is the supplier for the wellhead itself, the wellhead and the valves on the wellhead.

Q Okay. And the 4th row has -- the one that has a blank reference number just below row 3, that references Saturday, October 23rd, at 6:00 a.m. Do you see that row?

A That's Saturday, October 24th at 6:00 a.m.?

Q Yes. Pardon me if I misstated it. I think your powers of observation may be better than mine at this point in the cross, but yes, October 24th, 2015 at 6:00 a.m.

A Yes. I see that.

Q Thank you. And there, the events, Cameron began repairing wellhead seals of SS-25 on that date at that time; isn't that correct?

A Yes.

Q Okay. So is this the type of leak that could be mitigated, as you describe, on page 9 of your opening testimony? I'm sorry. Is this the type of leak that could be mitigated, as you describe in your opening testimony page that we just described -- the

page that we just examined? Excuse me.

A No. This -- the wellhead seal leak would not cause -- the shutting-in of the valves would not mitigate a wellhead seal leak.

Q Okay.

A If I stated that correctly. But the safety system, if it were to activate, would not mitigate a wellhead seal leak.

Q Because a wellhead seal leak is a subsurface leak?

A It's between -- it's not exactly subsurface. It's basically, really, at the surface, but it's -- it's on the reservoir pressure side of the safety valve. So if it were to shut, the wellhead seals are still exposed to the reservoir pressure. There's -- that safety valve will not isolate and shut-in a wellhead seal leak.]

Q Okay. And if there's a wellhead seal leak, could that impact the pressure in the flow lateral that you discussed earlier?

A It could. Yes, it could.

Q I just want to be sure you are finished with your answer before I continue. I don't want to talk over you.

A Yeah. I'm trying to think of the configuration now. Give me a second to think

about -- think this through.

Q Take your time.

A So a wellhead seal leak could, under some circumstances, cause the shut-in, but it would be highly -- in my opinion, it would be highly unlikely.

Q All right. Let's go to Exhibit 284. This is Email from Todd Van de Putte to Phil Baker, et al, RE: SS-25 Updates, 10-24-15. That's what the title page shows. If we go to the bottom of the page in the exhibit, we see Bates Number AC_CPUC_SED_DR_17_0001471.

If we go to the top of this document with that Bates page, here's an e-mail dated October 24, 2015, from Todd Van de Putte to Phil Baker, Amy Kitson, and Glenn La Fevers.

Do you see that?

A Yes.

Q Okay. If we can look at the body of the e-mail, middle of the first line, it starts approximately in the middle:

> Cameron did identify the wellhead seals aren't holding (like what happened at SS-44A). We tried pumping up the seals with packing and they won't hold full pressure.

The well-kill process should start in about an hour and, if all goes well, the well should be secured by this afternoon.

Do you see where I'm reading?

A Yes.

Q Is this e-mail referring to the wellhead leak during the SS-25 incident that was identified in the last exhibit we discussed?

MR. LOTTERMAN: Objection, calls for speculation.

BY MR. GRUEN:

Q To your knowledge.

A Yeah, I'm sort of getting out of my comfort zone having not been there. Could you repeat the question.

Q I'll try to do it in a way that is an accounting of counsel's objection. Let me just ask you about your knowledge about the identification of wellhead seals and whether they were holding at the time of this e-mail, 10-24-2015.

Are you familiar with the wellhead seals on SS-25 and whether they were functioning on October 24, 2015?

A Yeah, I don't have any knowledge other than what is shown in these two

documents. I'm familiar with the process of testing wellhead seals but, you know, I can't say based on this e-mail whether or not they were holding. I'd really have to defer to the e-mail itself from Mr. Van de Putte.

Q Okay. And would you also -- I mean I recognize that this is talking about a time period that may relate to the kill attempt, the kill attempts during the incident. So to the extent that we have further questions, are you deferring to Mr. Schwecke?

A Yes. I realize this is very -- this is the second day and even prior to the first kill attempt, so I'm not sure if he's able to address this or not. I just don't know.

Q Okay. But you can't?

A Yeah, I can't say, looking at just what's shown here, whether or not the wellhead seals were leaking. I would have to just rely on Mr. Van de Putte's statement here that they aren't holding.

Q Do you have any reason to doubt the accuracy of Mr. Van de Putte's statement that the seals weren't holding?

A I don't have any reason to doubt it.

Q Okay. Fair enough. Let me just

ask you just based on your experience and what this e-mail says. The likening of this wellhead, what happened in Well SS-44A, suggests that wellhead seals leaking is not an isolated incident -- is not an isolated incident; is that correct?

A That's correct. Wellhead seals have leaked in the past.

Q I recognize we're talking about this leak and we're looking at an e-mail dated -- that talks -- that happens to specify the leak during the time of the failure or the incident, I should say, but do you know how long the wellhead seal leak on Well SS-25 identified in this e-mail existed?

A I wouldn't be able to estimate a time for how long that may have existed.

Q Okay. And your testimony talked about things like daily inspections and other means of checking the wells; isn't that right?

A Yes.

Q So wouldn't the methods that you've identified for checking the wells that you've discussed in your testimony have detected this wellhead seal leak?

A I would expect that those monitoring methods would have detected --

would detect a wellhead seal leak. The weekly pressures would pick up -- are designed to pick up a wellhead seal leak because what happens is that the gas moves from the production casing into the surface casing, and so a weekly pressure is a check of the pressure in the surface casing. So that would be the primary way to pick up a wellhead seal leak.

Q Understood. Mr. Neville, if we could go to the next exhibit, Exhibit SED-298, you see there the title of the document on the cover page is 1979 SS-25 Well Sketch?

A Yes.

Q If we go to the next page. And for identification purposes, we can look at the Bates number. We see it's AC_CPUC_SED_DR_27_0004226. If we could scroll up on that page.

Do you recognize this document, Mr. Neville?

A Yes.

Q Okay. Indeed, that answer is consistent, I believe, with the first day of your testimony. If I'm not mistaken on your first day of cross-examination, you mentioned that there should be information about the

crossover ports that we talked about on the 1979 well sketch or the tubing details.

Do you recall talking about that on your first day?

A Yes.

Q And is Exhibit SED-298, the document we're looking at here, that 1979 well sketch that you were testifying about on Monday?

A Well, there is a document that has more detailed information of the tubing. It's called a tubing detail and it would be located in the workover history record of 1979, and it would have the location of the ports.

Q Okay. But -- oh, go ahead. I'm sorry. I didn't mean to crosstalk. Go ahead.

A This particular schematic is more general in nature. It shows the top of the Camco SSSV, but it doesn't show the individual components of that Camco SSSV.

Q And it doesn't show the crossover ports or did -- let me be more specific. It doesn't identify the crossover ports on Well SS-25 that are stated in your testimony; is that correct?

A That's correct.

Q Okay. Let me ask you just -- let's look at the notes at the upper right corner right where we are here under Standard Sesnon 25 if we could.

Thank you, Mr. Zarchy, for enlarging.

You see the dates where it says 6-25-76 to 7-9-76? It says, "Cleaned out to 8,748 feet, ran tubing with SSSV."

Do you see that?

A Yes.

Q What does that statement mean?

A So what it means is that -- this is a workover. It involves bringing in a workover rig, killing the well. The words "clean out to 8,748" is typical. There's a clean-out run to the bottom of the well. I presume 8,748 is the bottom of the well. And then tubing is run in the well. In this case, it's shown that the tubing contains an SSSV.]

Q Okay. And below that 2-16-79 to 2-20-79, it says "Replaced safety system." Do you see where I am?

A Yes.

Q Is that the Camco subsurface safety valve? Is that referring to the Camco subsurface safety valve?

A Yes. It -- it replaced the set -- subsurface safety valve that was run in 1976. The --

Q Okay.

A -- "Replaced safety system" is -- refers to replacing the one that was run in 1976.

Q Okay. So that's not when it was removed, then? It was just -- it was just a replacement at that point?

A Right. So when we -- we -- the way this -- the safety system works is that it -- it replaced the safety system, the housing part of the safety system, with a new housing. The actual valve is run in at a separate point on wireline, and it's set in the safety system.

Q Okay. Also on the sketch, if we could zoom out again, we see at 8451 feet -- you see the Camco SC-1 2 1/2-inch subsurface safety valve. Is that right?

A Yes.

Q Okay. So that's marking approximately where the crossover ports that you're describing in your testimony, but that aren't identified in writing on this exhibit are, right --

A That's correct.

Q -- where you -- where you say they're -- they should be. Is that right?

A Yes. That -- sorry for talking over.

The -- the 8451 marks -- typically, that's -- marks the top of this particular Camco safety system, which has a certain length associated with it and has different components, one of which includes the slots, or -- or ports, and that is not represented here in this schematic.

Q Okay. Before we leave this -- this exhibit, if we go to -- if we look at the WSO there, we see the water shutoff purse -- perforations at 8474 feet deep. Is that right?

A Yes, 800 -- 8475 feet.

Q 8475 feet. Excuse me. Thanks. I was off by one.

And the depth of the packer is at 8438 feet. Is that approximately right?

A I'm reading 8486 feet.

Q Yes. I'm sorry. Pardon me; where we're seeing the word -- the letters PKR. Okay. Is that right?

A Yes.

Q Okay. And if we look below the packer, what does 4 1/2 -- I believe it says,

"JSPF" mean at 8400 -- excuse me, 8542 feet? Do you see where I'm looking?

A Yes.

Q What does that mean, the 4 1/2-inch JSPF?

A So that would be the -- that -- that defines the perforations that are shown at -- at that depth as being 4 1/2-inch diameter holes, jets shots per foot. So there would be -- to summarize, there's four half-inch holes that were shot by jet perforating per foot.

Q And where -- at what depth are those holes? They go from 8542 feet to 8559 feet, then?

A Yeah. The way it's -- it's depicted on the schematic, it would be the perf -- that all of the perfs that are shown, 8510 and -- that -- that appears to be two sections of perfs. There's a section that goes from 8510 to 8538, and then there's the section that goes from 8542 to 8559. And that's how I'm reading it from the schematic, and that can be verified with the record.

Q Okay. And turning to the -- you see the tubing that we were looking at a moment ago on this sketch. I think it's represented by -- it has running up and down

and sideways prints inside it, 2 7/8-inch 6.5/EUE.

Does that indicate the tubing? Is that marked on the tubing, then?

A Yes.

Q Okay. And do you see the four rectangles below that -- those words, or those -- that -- that marking?

A Yes.

Q What do those four tang -- rectangles represent?

A So they appear to be the -- the restrictions. They appear to be the -- the profile. The -- the term that -- it's called a profile nipple for the -- that's located inside of the Camco tool, and there's a profile nipple that's located in the Otis XN tool. There's -- if you can see, the co- -- the Camco SSSV has a -- at 8451, in that tool, there's a restriction down to 2.313 inside diameter. So that's -- that's the restriction. I -- I believe the 2 7/8 is 2.441 inside diameter. So that restriction inside the Camco would be a 2.313, and then there's another restriction in the Otis XN, which is a 2.205 ID.

Q Okay. If I'm tracking right, by restriction, does that mean that nothing

that's larger in diameter than 2.313 inches could get below the top restriction?

A Correct.

Q And same for the bottom restriction, nothing that's larger than 2.205 inches could fit below that restriction. Correct?

A Correct.

MR. GRUEN: Okay. Let's scroll down a little bit on this sketch. That's -- that's good. Thank you. That works fine. Thank you.

Q Just quickly, one other question: Are these -- when you -- you talked about the restrictions, are these referred to -- are these the same thing as what's referred to as a no-go nipple?

A Yes. The lower one is -- is -- is called a no-go nipple.

Q And what does that mean, no-go nipple?

A Well, it -- by virtue of being a restriction, it's -- there's a shoulder on there that will accommodate a -- a mechanical plug. And so, you know, for lack of a better terminology, when you run a -- a plug that's slightly smaller than -- than the tubing diameter, but slightly larger than the -- the

XN, the 2.205, that's -- it's no-go. It's not going to go through it. So that's how -- that's how the operator can know exactly where to set that plug. He'll look at the depth, and he'll see that he can't run the plug any further than that point. And --

Q Okay. Okay. And there's a no-go nipple both at the depth of the choke and at the depth of the subsurface safety valve, then?

A Yeah. It -- actually, the -- a choke is similar to a plug, and it actually sets inside of the no-go nipple. They're -- it's not run in with the tubing that the XN no-go nipple is run in. The bottom hole choke is similar to a plug. Rather than being fully plugging, like a plug, it's got a small hole in it that allows the well to be -- flow at a different rate, depending on the size of the hole. So -- so the choke can be pulled and removed.

Q Okay. I think, just to -- to clarify, the -- I think what your testimony is is that the no-go nipple is at what's shown on this sketch as 8472 feet deep. Is that right?

A Yes.

Q And is there a no-go nipple also at

the depth of 8451 feet, shown as the depth of the Camco subsurface safety valve?

A There is another profile there. It's typically not called a no-go nipple, but it -- it really does the same thing for tools that would fit through the tubing, but be larger than the 2.313, which the -- the actual valve itself would -- would fit in that nipple, the subsurface safety valve, to my -- to my knowledge, of the -- the way the system works. When running the valve, similarly to running a plug, the operator has to have some way to know where -- where it's located and where it stops, and -- and it would stop on that 2.313 profile. It's typically not called a no-go nipple, though.

Q Okay. Thank you for the clarification.

If we could look at the depth, if you see, moving over to the left-hand side, the depth of 8585 feet, do you see that marking there?

A Yes.

Q Is that the depth of the shoe of well SS-25?

A It -- I would say, "Yes," as it's drawn right at the shoe, and I recognize the shoe as being that triangle that's filled in

solid. That's -- that's what typically denotes the shoe. And the depth is opposite that, so I would expect 85 -- 85 to be the depth of the shoe.

Q Okay. On the -- okay. And I think we covered the Otis XN. Maybe just to clarify, to be sure I understood it, at 8472 feet, you see "Otis XN"?

A Yes.

Q And what is that?

A So Otis is the manufacturer of this -- what we've called the no-go nipple. It's -- the model, the type is a -- it's called an Otis XN.

Q That's the type of no -- no-go nipple. Am I tracking right?

A Yes.

Q Understood. Okay. And just below that, it says, "8472 feet BH choke," with a space next to it.

So what does -- maybe if you could explain. I think you mentioned the choke before. But, could you explain what that means?]

A Yes, the choke -- when the field is at high pressures, basically full and -- actually most of the pressure range in the field -- the flow rate of the well can be

controlled by the BH choke, which stands for bottom-hold choke. And in a bottom-hold choke, it takes a wireline operation to run this particular choke, which is -- which is basically a disk with a hole in it. And it set downhole, bottom hole as opposed to being at the surface.

Q Okay. Just below that marking you just discussed, you see S4 shown at 8487 feet alongside the tubing?

A Yes.

Q Is that the same S4 sand -- is that S4 referring to the same S4 sand that you testified to earlier?

A Yes.

Q Okay. So that's the depth of the S4 sand, correct?

A Correct.

Q Okay. And you also mentioned the tubing details, and I think we found that too. So bear with me a second. Let me just ask you one more follow-up or two perhaps. So these rectangles in the 1979 diagram that we're looking at here that you explained, and I appreciate your insight on that, inside the tubing, how are those symbols, those rectangles different than the triangles that you identified as profiles or shoulder in the

SS-25 diagram on page 2 of your opening testimony?

A They are the same. I used a different representation --

Q Okay. Okay. Understood.

A Yeah.

Q Thank you. Okay. With that, let's go to Exhibit SED-299. And the title page -- the top of the title page heading says, "1976 tubing detail." And if we go to the next page, we see the Bates No. AC_CPUC_DR_27_0004227. And if we scroll to the top -- actually, let me just ask you about that Bates number. This one -- that actually follows the Bates number on the 1979 sketch that we just looked at which ended in 4226. And this is my understanding when we looked at it. So the reason I mention those here is does it make sense that this document would accompany the well sketch in the SoCalGas records?

A No. The well sketch -- the schematic was drawn in 1979. I would expect that the well schematic would be after the '79 tubing detail, but it's hard to know without looking at the well file because the well file has different -- different folders and clasps. So it's hard to say -- I could

tell you where I would expect to see the schematic in the well file.

Q Please.

A And I would expect to see the schematic after -- that was drawn in 1979 to be after -- to be on top of the 1979 workover and the tubing detail. This is the 1976 tubing detail.

Q This is the 1976 tubing detail. Understood. So in this case, since the Bates numbers are the same or that they are in sequence -- excuse me -- do you understand why there's a sequence between the 1976 tubing detail and the 1979 sketch?

A Why they are next to each other?

Q Yes.

A I don't know.

Q Okay. So let's look at the tubing detail beginning -- if you scroll down to No. 10 slightly. Thank you. And if we read down the list, I'm going to ask you to explain what each term means here. So starting at No. 10, "D-S nipple 1/2 inch HYD. Control line, SCI safety." What does that mean?

A Starting to get a little outside my comfort zone. I mean, I haven't personally run these systems. So I'll -- I can tell you that the D-S nipple with the control line is

part of the safety system. In fact, it looks to me like line 10 is the entire safety system.

Q And the safety system meaning the subsurface safety valve?

A Yes. The valve that really is the housing, and the valve is run after the housing is run.

Q Okay. And No. 11, moving down, we see "1-20" -- I think that's a foot symbol -- "blast joint (Camco)." Did I read that correctly?

A Yes. That would be one 20-foot section of a blast joint --

Q Thank you. Pardon me for interrupting. Thank you. What does that mean?

A So blast joint is a section of tubing that is a little thicker wall than normal tubing, and it accommodates a turbulent flow at the -- in the vicinity of the crossover ports.

Q Okay. No. 12, "No-Go nipple. 1.81 inch I.D. (Camco)." Is that referencing the No-Go nipple that you described to us when we looked at the 1979 sketch?

A Well, this would be -- since it's done after the '76 workover, this would be

what was installed in 1976, you know, keeping in mind there was a 1979 workover that installed a different tubing string.

Q Okay. So is this the same No-Go nipple or a different one?

A It would be a different one.

Q So this No-Go nipple is shown at a depth of 8470.33 feet; is that correct?

A Yes.

Q And is that depicted by the triangles in your opening testimony?

A It's -- well, my opening testimony depicts the 1979 tubing detail. So -- and that was my intention, to depict what was in the well in 1979. This particular tubing was in the well from 1976 to 1979 at which time it was completely replaced.

Q I see. Okay. Moving to No. 13, I assume from your earlier reading, this is one 10-foot section of blast joint; is that right?

A Yes.

Q But as indicated by the depth, it's a different section. So is that also right?

A Yes.

Q Okay. I think we have enough. So let me just ask you do any of the details here indicate the location of the crossover

ports?

A In this particular detail, the crossover ports would be in the item No. 10 if it's the safety system. I think it's scrolled down. And I don't know if they are graphically illustrated or not. Sometimes they are not.

Q Go ahead. Sorry. I didn't mean to interrupt. Just wanted to -- follow me -- if you follow Mr. Zarchy, where do you want to go, Mr. Neville?

A Yeah. The item is No. 10, the safety system. So if you could scroll down the graphic on the left. Okay. That's good. So I just wanted to check the graphic. They are not shown in the graphic, the crossover.

Q Right. Okay. All right. I'd like to ask a different line of cross and, in particular, a series of questions about SoCalGas recordkeeping practices. And we had heard the testimony of Mr. Healy with regards to some of this, and SoCalGas counsel, I believe, who was representing Mr. Healy deferred to you, Mr. Neville, during the cross-examination of Mr. Healy. So if we could -- first of all, let me just clarify. This is a question with relation to the scanners of the certain well files in Mr.

Healy's testimony. And I believe that you discuss -- you reference to Mr. Healy's testimony as well.

So first let me just ask you, with that introduction, are you aware that Mr. Healy deferred to you -- or SoCalGas counsel deferred to you with regards to certain of the scanning practices of the SS-25 well files?

A I'm not a -- I'm not remembering, but I don't -- I won't doubt -- I won't doubt that.

MR. LOTTERMAN: Your Honor, I have a different recollection as to what the witness said. I would suggest that Mr. Gruen probe Mr. Neville's firsthand knowledge and leave it at that versus trying to link it to something that some other witness said four weeks ago.

MR. GRUEN: We'll try to work with that, your Honor. No concerns.

Q Let's go to your testimony, which is SoCalGas -- Exhibit SoCalGas-15. And if we could go to page number -- with Bates No. 15.0006. And I'll wait for the screen-sharing, Mr. Neville. If you'd also let us know when you get there on your copy.

A Okay. I'm here.

Q So lines 18 through 21, if you can go there, and there you say, in lines 18 through 21:

> As discussed in Chapter IX (Healy), it appears that these and other records were provided by SED to its witness in a manner that does not reflect the organization and accessibility of the electronic hardcopy records maintained by SoCalGas.

Do you see that?

A Yes.

Q So just clarification question with that. Since you reference Healy, are you relying on Mr. Healy to discuss the scanning of the records that were provided to SED?

A I am relying on Mr. Healy -- the scanning -- I guess we have to look at the entire process of getting the records. I would say, for the most part, I am relying on Mr. Healy. I -- having said that, I do know that a large pdf scanning process where -- could not represent the four subsections of the well files and the fact that there's different sections within each subfile. So -- and the particular -- there's no nomenclature on the pdf's, and I -- my sense

was that that doesn't really reflect the organization that you see in a hardcopy file.

Q Mr. Neville, did you observe the scanning of -- any scanning of well files that were provided to SED?

A No.

Q Did you supervise any of the scanning of well files that were provided to SED?

A No.

Q Did you talk to anyone who did the scanning of the well files that were provided to SED?

A I wasn't actually -- let me see if I can remember. I did -- I pointed the scanners to the file cabinets because I was working in that office where the well files were located, and I provided the location of where the files were located.

Q Okay. So you met the scanners; is that right?

A I did meet -- I met the scanners briefly.

Q Do you recall their names?

A No, I don't. I know they were with a company called I Scan, I believe, or I something. Sorry. I can't recall a name.

Q Okay. Is there a record of their

name somewhere?

A I don't know.

Q Okay. Do you know who supervised the scanners?

A Which -- they were brought in by legal.

Q And who, in particular, handled the supervision of the scanners? What's the name of the person?

A I don't recall the name of the individual, but it was someone -- it was an individual with the legal team at Morgan Lewis.

Q Okay. How do you know that?

A I was called in advance just to --

MR. LOTTERMAN: Mr. Neville, if your discussion is with counsel, I believe that would be a privileged discussion. So I would caution you in answering this question.

THE WITNESS: I was called by counsel.

BY MR. GRUEN:

Q Okay. You were called -- I don't want to run a foul on privilege. But I think this is fair game, and I will defer to counsel to say if it's not.

You were called by counsel in order to -- who you understood was supervising the scanners?

MR. LOTTERMAN: I will object about this question on the grounds that it would reveal privileged communications. I also question the relevance of all this, but I'm not going to press on that. But as to what discussions Mr. Neville had with my law firm or SoCalGas legal counsel in any regard on this is privileged.

ALJ HECHT: Objection sustained. I -- the fact that there was a call has been established. The details of that call, if it involved counsel, I expect are privileged.

MR. GRUEN: Understood. Your Honor, since counsel raised the objection of its relevance as well, may I have an opportunity to respond to that particular part of the objection.

ALJ HECHT: Yes. Go ahead. Briefly.

MR. GRUEN: I will briefly, your Honor. The relevance as this -- that this goes to is that SoCalGas has stated that the records are organized. Mr. Healy has testified at some length that the records were provided in an organized fashion, but nobody is able to tell us the scanning or the chain of custody that went from the actual hardcopy files to those provided to SED, and SoCalGas is disputing that SED has properly identified the files as

disorganized.

And so to the extent that we cannot get the names of the scanners or cannot identify the chain of custody, SoCalGas isn't providing that, we can't get to the bottom of whether SoCalGas -- SoCalGas' contention has merit. That's the relevance. With that, I appreciate the privilege of the overruling. I will -- I will move on.

ALJ HECHT: I would like to give SoCalGas an opportunity to respond to that since you gave that explanation, if they wish to respond.

MR. GRUEN: Yes. Understood.

MR. STODDARD: Thank you, your Honor. Yeah. I don't know that it's necessary if we're moving on to address this, but briefly, the point here isn't so much a representation, as Mr. Gruen characterized it. I believe the point of the testimony is that SED does not review when -- their -- they have alleged that the well records are not in an organized format in the form that they reviewed it, which, again, was an electronic production. And so you're looking at a single long document that includes, you know, logs of various kinds, which can run on for many, many pages of a pdf.

If you look at the well file in the Redwell folder in which it exists and the file components, which I believe Mr. Healy testified to and which Mr. Neville has explained as well, it has a logic to it that is three dimensional, and that's different from a single-page document.

The scanners, what they did is not relevant. What we are talking about is the three dimensional format of the document, which is the issue that we've been trying to argue.

ALJ HECHT: Thank you for that clarification.

Mr. Gruen, do you have a brief response, or do you want to move on?

MR. GRUEN: Your Honor, I think we need to depose the scanners and get to the bottom of this. I get counsel's argument, but we don't have the facts in place to know the merits. So we'll -- I'm prepared to ask Mr. Neville some questions that get to some of this, I believe, to the extent he's able to answer. But it seems to me that SoCalGas -- there's a concern here that SoCalGas is not providing a witness who can answer questions that go to the organization of the files.

ALJ HECHT: Before we get to Mr.

Stoddard, I have a more basic question. When did the scanning take place?

Yes.

MR. STODDARD: I can answer that.

MR. GRUEN: Your Honor, if I may, shouldn't the witness be answering that?

ALJ HECHT: I would be happy to hear from the witness, but I am asking counsel because it sounds like they organized (inaudible).

Please proceed, Mr. Stoddard.

MR. STODDARD: Thank you, your Honor. It's my recollection -- you know, subject to check, but it's my recollection that it was in the winter of 2016 around January.

ALJ HECHT: All right. Okay.

(Interruption by reporter.)

MR. STODDARD: I apologize. I am a fast talker on occasion. I will slow down and repeat myself.

Subject to check, my recollection and understanding, it was in the winter of 2016, I believe, in January, which is during -- you know, while the leak response was ongoing.

ALJ HECHT: Thank you. And -- all right. Continue.

Mr. Stoddard, I believe you were

going to respond.

MR. STODDARD: Yes. Thank you, your Honor. Again, this is another instance which, you know, we touched upon a few times where SED is asking for the witness on issue where they have presented testimony, we provide a response to testimony, they've had opportunities for discovery, and they are now taking the next step beyond wanting to test the issues that they've had ample opportunity to conduct discovery on. They filed a motion to compel an appearance of scanners at this hearing, which was denied. They never actually sought a deposition until, I think, two days ago when they folded it into an oral motion to quash, I believe.

And again, the time for discovery is over. We're at hearings. So you could cross-examine Mr. Neville to the degree that he -- as your Honors ruled, I believe, in denying that motion to compel, he can test the knowledge of these witnesses on issues that are within the scope of their testimony. To the degree they can't speak to it, it goes to their credibility, and that was clear in your Honor's ruling. And if they can speak to it, then their testimony is in the record, and it's available to Mr. Gruen.

If he has, you know, documents he'd like to question about, he can do so, but it's not the time for further discovery in this case. That time is over.

ALJ HECHT: And does Mr. Gruen want to respond?

MR. GRUEN: I'd like to continue cross-examining the witness. I'm mindful of our process, your Honor.

ALJ HECHT: Then let's continue from there. At some point, we will need to revisit what may or may not be a motion to -- a new motion to have a deposition or other discovery or something with the scanners, but I agree that that's not a conversation you need to have now.

Please go ahead.

MR. GRUEN: Thank you, your Honor. Understood.

Q Mr. Neville, are you familiar with the chain of custody between the hardcopy well file as it existed during the incident and the electronic version of it that was provided to SED?

A I'm not familiar with that chain of custody, no.

Q And you understand what I mean by "chain of custody," correct?

A By chain of custody, I assume you're -- well, maybe you should describe.

Q Each of the individuals who were responsible for handling or management of the well file between when it was -- it was -- it existed during the time of the incident and up until it was actually provided in electronic format to SED, are you familiar with that process?

A No.

Q Okay. Were the SS-25 well files, after they were scanned, were they put back in the same order as they were scanned into the SS-25 well file? Do you know?

A I wouldn't know. No, I don't know.

Q Okay. Do you know if any documents are missing from the SS-25 well file since scanning of it?]

MR. LOTTERMAN: Your Honor, I think this might be a speculation objection as well since if Mr. Neville isn't aware of the before, I'm not sure he can compare with the after.

ALJ HECHT: I think that what we're going to do is we're going to take a 10-minute break and then we'll come back from that break and I will rule on that objection and we can continue from there. We will

start our break now coming back at 11:25. We'll be off the record.

(Off the record.)

ALJ HECHT: We'll be back on the record. While we were off the record, we just took a short morning break. We discussed the schedule for the cross-examination of this witness. It sounds like SED will be wrapping up with this witness before lunchtime, which I encourage. I don't know when exactly we'll take our lunch break, but we typically have been taking it between about 12:15 and 12:30.

With that, there had been some questions about scanning and scanners, and there had been an objection. Rather than discussing and repeating that, I will say to witness Neville, please just answer to the best of your ability, as I have said a number of times to other witnesses earlier in these hearings. If the answer is "I don't know" and that's true, then that's a perfectly legitimate answer. So answer to the best of your ability and let's move forward.

THE WITNESS: Okay.

ALJ HECHT: It looks like everybody is ready.

Mr. Gruen.

MR. GRUEN: Thank you, your Honor.

Q Mr. Neville, similar questions to you. Do you understand what I mean when I refer to the well file for Well SS-25A and the well file for Well SS-25B?

A Yes.

Q Those are separate well files, each one from each other, as well as from Well SS-25, are they not?

A Yes, they're separate files.

Q Did you observe the scanning of the well files of Well SS-25A and/or Well SS-25B as they were provided to SED?

A No.

Q Okay. Did you talk to the supervisor of the scanners of Well SS-25A?

A No.

Q How about for SS-25B?

A No.

Q Okay. If we could go to Exhibit SED-257. This says SoCalGas Response to SED Data Request 129 at the beginning of the cover page. If we could go to Bates stamp that's marked SED-257.006 -- actually, before we do that, I want to just lay foundation for this.

Mr. Neville, do you recognize this as SoCalGas Response to SED Data Request 129?

A Data Request 129?
Q Correct.
A Yes.
Q Okay. If we go now to the page with Bates stamp 257.006, which is shown there, and we go to Question 9 that's right there, we asked, "Did SoCalGas personnel or contractors scan documents in each well file in the exact order as the documents were kept in the hard copy well file?"
Do you see that?
A Yes.
Q And we continue, "If the answer to this question is not an unqualified yes" --
No, stay there, stay there, stay where we were on that first page.
"If the answer is not an unqualified yes for each well file provided to SED in response to data requests, state exactly how each well file scan differs from the hard copy version."
Do you see that?
A Yes.
Q Continuing on to the next page, we see the response:
SoCalGas objects to this request as vague and ambiguous, particularly with respect to the

term 'exact.' Subject to and without waiving the foregoing objection, SoCalGas responds as follows. Please refer to Section 5 of SoCalGas' reply testimony, Chapter 9, (Healy).

Do you see that?

A Yes.

Q Now I'll ask you again. Are you aware that Mr. Healy deferred to you with regards to certain questions about the scanning of the well files?

MR. LOTTERMAN: Objection, assumes a fact not in evidence, but I'll let Mr. Neville answer.

Go ahead.

THE WITNESS: If it has to do -- I'm sorry, I lost train of thought. If you wouldn't mind repeating.

ALJ HECHT: I believe that the question was whether you knew that certain questions had been deferred by witness Healy to you. Mr. Gruen can correct me if that is wrong, if that is the question. If you have an answer to it, please answer and we'll move on.

THE WITNESS: Yeah, I don't recall questions about the scanning.

///

BY MR. GRUEN:

Q Okay. Understood. If we could turn to another line. And we'll do our best to wrap up so everybody can have lunch here. Let's go to, if we can, your opening testimony, SoCalGas Exhibit-01, page 7, lines 21 through 31. If you scroll up. Yeah. The Bates number is SoCalGas-1.0008, and now up to line 21.

Thank you, Mr. Zarchy.

There you describe in your opening testimony the reporting of underground storage well leaks and repairs of those leaks to DOGGR; is that correct?

A I discussed the repair and the reporting of the workovers and the repair of the leaks to DOGGR, yes.

Q Fair enough. I appreciate the correction. So this passage describes a process for -- of -- specifically at lines 21 through 25, the passage there describes a process for documenting SoCalGas' well leak remediation efforts; correct?

A Yes, as it relates to our interfacing with DOGGR.

Q Understood. And the passage describes a process for documenting SoCalGas' investigative work related to those leak

remediation efforts, would you agree?

A Pardon? Could you repeat, please.

Q The passage describes a process for documenting SoCalGas' investigative work related to those leak remediation efforts?

A As it pertains to the workover.

Q Understood. Mr. Neville, is it your position that Blade's root cause analysis and supporting exhibits identified all of the documented well leaks at Aliso Canyon?

MR. LOTTERMAN: Objection, I believe that exceeds the scope of Mr. Neville's testimony.

MR. GRUEN: Your Honor, I'll try to rephrase.

Q Mr. Neville, have you had a chance to review the Blade root cause analysis, any portion of it?

A I've reviewed portions of it, yes.

Q Have you looked at the portions that identified leaks in the Aliso Canyon field?

A I have to -- I have looked at the report, yes.

Q Okay. And in your review of the report, could you tell that Blade counted all of the leaks at Aliso, all of the well leaks

at Aliso?

MR. LOTTERMAN: Your Honor, again, I will repeat that this line of questions was not either in Mr. Neville's testimony or, frankly, in any cross-examination documents that were given to him. I would be very hesitant to let Mr. Neville opine on this issue.

MR. GRUEN: Your Honor, may I? I just want to be sure I'm tracking.

ALJ POIRIER: Judge Hecht, I think you're muted.

ALJ HECHT: All right. Objection sustained. Let's move on.

MR. GRUEN: Your Honor, SED did, in fact, provide documentation. It happened to be before the last round of hearings. We can show that. So I'll try to rephrase the question to address that. If we can, let's go to Exhibit 238, SED-238. This is the annual report entitled Annual Report, SoCalGas Response to SED Data Request 16(5).

ALJ HECHT: It says "17." I believe you said "16."

MR. GRUEN: Thank you, your Honor. Apologies. I'm getting tired. Thank you for the correction.

Q SED Data Request 17(5). If we

could go down to the first page, this is entitled Southern California Gas, Aliso Canyon Field Annual Review Meeting with the Division of Oil and Gas. If we go to the bottom of that page, the Bates number is AC_CPUC_SED_DR_17_0001027.

Mr. Neville, are you familiar with --

Could we scroll up, please, Mr. Zarchy, to the title. Yeah.

Are you familiar with this document, Mr. Neville?

A Yes. Does it have a year? Is there a year on the document?

Q I believe there is. If we could scroll down to the next page, let's see if we can find it.

MR. LOTTERMAN: I believe it's the top right-hand corner of the page you just had.

MR. GRUEN: Thank you.

Q If we scroll up to the top of the top right corner, the date shows 1990 there. With that clarification, do you recognize the document, Mr. Neville?

A Yes, I do. It was before I started with the company but I do recognize this document.

Q Let's turn to the page with Bates

Number AC_CPUC_SED_DR_17_0001051. If we could go to that page. There's the Bates number as I just read it.

Scroll up.

So there we see Table 6, Aliso Canyon Losses Detected and Corrective Measures Taken May 1989 through May 1990.

Do you see that?

A Yes.

Q Okay. If we go to the first entry under the "Well" column, we see there Well SS-7.

Do you see that?

A Yes.

Q "Shoe leak detected in 1989"; correct?

A Yes.

Q There it says, "Well was not killed because rate of leakage is low."

Do you see that?

A Yes.

Q So, Mr. Neville, I want to compare this document and just go through the exercise of comparing a few things from this document to the document that you testified earlier that showed leaks in Aliso Canyon.

With that understanding, if we could pull up Exhibit SED-286.

ALJ HECHT: We'll be off the record while we find the document.

(Off the record.)

ALJ HECHT: We'll be back on the record now that we have found the place in the documents.

Mr. Gruen, go ahead.

MR. GRUEN: Just for the record, this is SED-286, SoCalGas Response to SED Data Request 11, Documents.

Q Mr. Neville, do you recall being asked questions about this document?

A Yes.

Q Okay. Let's scroll down to the next page and rotate and enlarge. This was the document, while we're doing that, that identified the leaks that you and your team worked on to provide SED with the leaks at Aliso; is that right?

A Yes.

Q If you could, Mr. Neville, just going through this page, which is Bates stamped -- if we could find the Bates stamp and I can read it into the record. Thank you. AC_CPUC_0036138. If we could go to the next page, too, and do the same. It's AC_CPUC_0036139. I'll give you a chance, Mr. Neville.

Can you tell me whether on this document and those two pages that you provided there is reference to a leak on Well SS-7?

A You'll have to scroll to the next page.

Q Sure.

A Scroll up. I believe the time frame was 1989 so you'll have to --

Q Yes. My understanding was '89 through '90. Does that comport with your understanding as well?

A Yes. And then -- okay. I want to start checking from 1989. If you could continue then to -- I don't see any repair or identification. Okay. I don't see that well listed here.

Q Okay. Thank you. If we could go to Exhibit SED-241. The title page, the first part of the title page, SED-241, Annual Report, SoCalGas Response to SED Data Request 17(8). If we could scroll down to the first part.

Mr. Neville, do you recognize this document?

A Yes.

Q Can you briefly describe the document at a high level -- or let me ask it

this way: Would you accept -- do you agree that the depiction in the title is a fair characterization -- on the title page is a fair characterization of the document?

A Yes.

Q If we scroll down to Bates Number AC_CPUC_SED_DR_17_0000706, do you see that in the lower right corner?

A Yes.

Q Table 6 here is Aliso Canyon Losses Detected and Corrective Measures Taken, May 1988 through May 1989.

Do you see where I am?

A Yes.

Q So here you see shoe leaks identified. I'll ask about Well SS-17 and SS-30. Both of those show shoe leaks; is that right?

A Yes.

Q Do you see the detection dates for SS-17, November of 1985, and for SS-30, it's 1986?

Do you see that?

A Yes.

Q Let me just verify. These are indeed shoe leaks as shown here and the information on here is accurate.

Would you agree?

A That's the statements made here in this meeting of 1989 that those were identified as shoe leaks at that time, yes.

Q And it's a SoCalGas statement; correct?

A Yes.

Q Okay. Is it an accurate statement to your knowledge?

A To my knowledge, it's an accurate statement, yes.

Q Okay. Let's go back to Exhibit 286. Mr. Neville, it's the same question; if you could identify for us just on the same page, as we were just looking at on Exhibit SED-286, your leak table that you provided in response to Data Request 11. Could you show us where on this table it shows a leak on either Well SS-17 or Well SS-30? And we'll follow you. You can tell us where you want us to go.

A Yeah, it's just so that I can get a bit of review. You would need to scroll up to the next page.

Q Sure.

A Okay. Right there. I don't see SS-17 or SS-30.

Q Okay. Mr. Neville, just with regards to these -- the documents that we've

been reviewing, I wonder, the last two exhibits, are those SoCalGas annual reports?

A Those would be -- yeah, those are annual reports during the meeting between DOGGR and SoCalGas.

Q So SoCalGas is reporting the leak information that we just covered to DOGGR about pertaining to the wells at Aliso Canyon; is that right?

A Yes.

Q If we could bring up Exhibit 274 again. This is estimated well conditions as of 11-10-15. If we could scroll down.

Mr. Neville, do you remember discussing this document yesterday?

A Yes.

Q I wanted to clarify for the record, I believe I may have inadvertently misstated the handwriting at the top. It seems that it's referring to estimated well conditions as of 11-10-15.

Would you agree?

A Yes.

Q Okay. And if we scroll to the bottom of the document, I'll read the Bates number just for identification purposes. It's AC_CPUC_SED_DR_17_0046340. You see right above the Bates number there's a

"6-16-86," Mr. Neville?

A Yes.

Q Does that look like a date to you?

A Yes.

Q The date of when this sketch was initially produced?

A I don't know if that's the case with that date. I don't know what that date represents.

Q Do you know when this sketch was produced without the handwriting, when it was initially created, I should say, without the handwriting?

A No.

Q Okay. Can we scroll to the top.

Prior to the hearings and prior to being served, had you seen this sketch before?

A The sketch with the writing?

Q Let's start with the sketch without the writing.

A Yes, I have seen the sketch without the writing.

Q Approximately when? When was the first time that you saw it?

A I'm trying to recall if it was included with some of the early data requests that I worked on. I don't recall exactly

when I saw this particular sketch. I do know I saw it while I was preparing my testimony.

Q Okay.

Your Honor, I might just flag for this -- let me ask one more question.

Mr. Neville, I think that we're pretty close to done, but maybe it's more than one. Without the handwriting, does this sketch pre-date the Aliso Canyon incident?

A Yes.

Q Okay.

Your Honor, I think we may have the classic example of a hybrid document here; that is to say, perhaps the handwriting was created by someone at SoCalGas during the incident while the underlying document seems to pre-date it, as Mr. Neville just testified. What I might request is that we have, just for purposes of crossing on this, we might have both Mr. Neville and Mr. Schwecke available for questions at the time when it's Mr. Schwecke's turn. I think we could do a brief cross on that.

I'd ask if counsel to SoCalGas would stipulate to that.

ALJ HECHT: Mr. Lotterman.

MR. LOTTERMAN: Your Honor, my view is let's take care of Mr. Neville right now. To

the extent he knows about the document, let's ask the questions and -- in fact, I believe they were asked yesterday, but we can re-ask them and then let's let Mr. Neville go.

I don't know what value there is to keeping Mr. Neville on hold if, in fact, Mr. Gruen basically exhausts all the information or testimony that Mr. Neville has on this document. We can table the issue about Mr. Schwecke. I just don't understand this sort of hybrid, keeping-people-around-for-a-while approach.

ALJ HECHT: Mr. Gruen.

MR. GRUEN: It's certainly possible that we have exhausted our cross of Mr. Neville, your Honor. The concern I have is I don't know that we have until we get an answer about the handwriting. I guess one option would be that Mr. Neville is available in case we have additional questions that come up because of the answers on the handwriting, but my concern is we're going to need him and so I'm flagging it now. But to Mr. Lotterman's point, at this point, given what we know about the document, we've exhausted our questions of him.

ALJ HECHT: All right. I would prefer to finish with this witness now and not kind

of leave him hanging with, of course, the caveat that if something comes up that appears clearly to be in his area, he can be recalled at a later time.

Is there any objection to that by Mr. Gruen or Mr. Lotterman?

MR. GRUEN: No, your Honor, none from SED at this time.

MR. LOTTERMAN: None here, your Honor. Thank you.

ALJ HECHT: All right. So I will say that you should finish your cross -- you, Mr. Gruen -- should finish your cross with Mr. Neville now. I can't quite tell whether you've finished this line or you've finished entirely. After that, we will take our lunch break, and then we will pick up with the Public Advocates Office.

I expect that when Mr. Neville finishes with both cross and redirect, that we will let him go. If for some unlikely reason there is some reason to call him back, we can do that.

MR. GRUEN: Thank you, your Honor. I appreciate that. At this time we have no further questions for Mr. Neville. I do want to just thank Mr. Neville for his time. I appreciate that this has been several days

and we appreciate him staying with us throughout that time. I know you're required to do so, but thank you for your participation.

THE WITNESS: Sure.

ALJ HECHT: I actually would also like to thank Mr. Neville. This has been a lot of very technical testimony and I appreciate being walked through it. I think this is an example of why the Commission has traditionally tried to have administrative law judges who have engineering backgrounds, but I am not one of those. So I have found this very helpful and valuable and I just wanted to say that.

I know that we will be going back to Mr. Neville this afternoon for the Public Advocates Office's cross and hopefully then redirect.

Are there any housekeeping or other issues that people want to deal with before we take our lunch break?]

MR. GRUEN: Your Honor, at this time, SED would make a motion in which we would request that SoCalGas be required to produce for deposition both the scanners and the supervisors of the scanners of the well files to SS-25, SS-25-A and SS-25-B. This -- the

record is clear that neither Mr. Neville nor Mr. Healy, both of whom were testifying -- whose testimony went to the scanning and the merits of the well files that were provided to SED -- neither of them are able to answer questions about it. We showed a data request which showed that we asked SoCalGas questions about the scanners and -- and the documents that were provided to SED. The -- the response referred to Mr. Healy's testimony. In short, we did discovery. We did our diligence. They referred us to the testimony, to hearings, if you will, and SoCalGas witnesses were unable to answer questions. This goes to the dispute that SoCalGas has raised about whether SoCalGas provided SED with organized well files in the form of well SS-25, 25-A and 25-B, all of which are identified as violations in SED's opening testimony.

ALJ HECHT: I am assuming that Mr. Stoddard would like to respond?

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

Again, this is an issue that was briefed, probably more extensively than we're going to argue it here today. A lot of the arguments for the deposition would be the

same as the arguments that are raised in the context of the motion to compel the appearance of the scanners for purposes of hearing. Your Honors correctly denied that motion to compel in that context on the basis that the witnesses are going to be testifying and speaking to their prepared testimony, and are available for cross-examination on that basis.

However, separately, SED has had -- again, this is -- this isn't discovery, in this instance. This is very different, for example, from the deposition of -- of Mr. Holter that was addressed in the motion for reconsideration, because that was a motion to compel that was filed -- you know, that's been pending dispute since last October. We were pursuing discovery at the appropriate time. SED asked us in data requests on this issue. We actually provided them with the identity of the vendor that conducted the scanning in the course of meet and confer discussions. They had ample opportunity to pursue discovery. They're a third-party, again, and they could have been subpoenaed for a deposition or they could have been requested, they -- they could have propounded third-party discovery on them

directly. The scanning occurred -- and they didn't do so.

The other issue here is, you know, this is an unusual request to do further discovery of this sort in the middle of hearings, and it should require a higher bar than simply, you know, "We've asked this witness some questions about his knowledge, he can't answer them, and we'd like to ask somebody else who might know the answer." In this instance, you know, the likelihood that this is going to lead to discovery of admissible evidence is actually extremely low because of the fact that this was a vendor working at the direction of counsel that scanned -- you know, individuals working for them scanned these documents amongst -- and, you know, I'm going to say thousands, possibly ten -- hundreds of thousands of other documents in the course of -- of collecting documents for -- for purposes of litigation during the pendency of the leak more than five years ago, and the likelihood that there's any recollection of the SS-25 well file, which would have no particular significance to an individual involved in the scanning at that time, is extremely extremely low.

To the degree that SED is actually going to get some form of a deposition here or wants to make an argument, they should -- they should have to specify the questions that they would plan to ask those scanners, in particular, because, you know, again, this is highly unusual, and I think it would help us assess the likelihood that they would have responsive information, so that we don't spend time conducting a deposition with a third party where the answer to every question is going to simply be "I don't know" or privileged.

ALJ HECHT: Thank you. Did we have a response from any other party?

Ms. Bone, was that a "Yes"?

MS. BONE: Yes, your Honor. It just seems to me that the -- the evidence that -- that Mr. Gruen is looking for is directly relevant to violations that are asserted. So to the extent that SoCalGas has not provided answers to these requests, you know, first of all, we should be able to continue to -- to require witnesses to answer questions on these issues, and to do whatever discovery is necessary to get to these violations, to the extent that SoCalGas has been playing a shell game, and pointing to witnesses who now can't

answer the question, which is what it appears to me. So we support so -- SED's motion, and there you have it.

ALJ HECHT: Yes, Mr. Gruen, and then Mr. Stoddard.

MR. GRUEN: Your Honor, Public Advocates has it right. They've captured it correctly. These are percipient witnesses, asking them for what -- we want to know what observations they had. And I would say this is -- there's a greater need to depose these percipient witnesses than Mr. Holter, because these witnesses -- SED was not present to see what these witnesses were doing, and SoCalGas -- we have done discovery, as the record now shows. I don't understand. Counsel made a point before we did our cross that the time to do discovery is over. I disagree with that. I think this is -- this has been a form of discovery during -- during cross-examination. Counsel is not done. Counsel's not done. SoCalGas is not done with their discovery. SED has extremely broad discovery rights under statute. There's nothing that limits those discovery rights here. The time for discovery is absolutely not over. This is an ongoing investigation. The record is not closed.

Nobody has told SED at this time that SED cannot pursue discovery. The moratorium is over, as well. We have the opportunity to do it, and SoCalGas has not answered the question about the state of those well files. We asked fundamental questions about the -- how they moved from hard copy to electronic and were provided to SED, and none of their witnesses could answer the questions. Somebody should be required to, your Honor. This'll get to the bottom of that.

ALJ HECHT: Yes, Mr. Stoddard.

MR. STODDARD: Thank you, your Honor.

First, to respond to Cal Advocates, for the most part, you know, her characterization that we've been playing a shell game is simply not true. Part of the difficulty with this issue, as with all the issues in this, is that the alleged allegations by -- sorry, the alleged violations by SED are extremely vague, general, and don't lack a lot -- and lack a lot of specifics.

In this instance, the allegation is the well files are generally disorganized. Right? And that -- and our response in testimony to that was they were reviewing electronic production version of the well

file, which is not a good representation of the organization of the well file. If you look at a red well well file, which they've neither asked to look at, and when we raised the issue, they didn't follow up to ask to look at it, either. After testimony, you'll see that some of these logs, for example, not only as I've described them before, are very very long, and therefore, kind of cumbersome to review in PDF; but they look like little bricks. They're little booklets. And when you stack them, you don't put them necessarily in a particular order, because you know -- an engineer knows where to find them.

SED is focusing on the scanner issue kind of as a defense to that argument, and it is -- it's a red -- simply a red herring, and it's really not relevant to the core issue here, which is they've alleged that they're disorganized. They have the version that we produced in the scanned format. And -- and again, what we've argued is you need to see the physical document. Right? You need to see the physical file, which again, they've never asked to look at on some, you know, conspiracy theory that the document was cleaned up and reorganized after the fact,

none of this for which they have any evidence of. It's just supposition. Okay?

At the end of the day, this is discovery. And I agree with Mr. Gruen that a lot of what's been happening on the stand here throughout this proceeding is discovery. Okay? That is not what evidentiary hearings are supposed to be for. That's not to say that SED doesn't have discovery rights separately; but, for purposes of conducting cross-examination and calling witnesses at hearings, it's intended to be about the testimony that was offered. And in this case, SED has the burden. They offered their testimony. SoCalGas responded to it. They are cross-examining our witnesses about their testimony. At the end of the day, this is just further discovery. And it's not just discovery; it's on an irrelevant -- it's on a -- frankly, a fairly irrelevant issue that, again, is extremely unlikely to lead to the discovery of admissible evidence.

ALJ HECHT: And before I continue, Ms. Bone.

MS. BONE: You know, I'll just observe that my understanding is that there's a possibility that documents may have been destroyed. There is concern about that. And

so, from that perspective, and to the extent that the well files were not provided in the same order as they existed for SoCalGas, these are not irrelevant issues. This goes directly to the issue of, you know, have they been acting in good faith in response to this investigation, which is also another set of violations; so not irrelevant, very relevant, and this needs to be pursued.

ALJ HECHT: Yes. Before Mr. Gruen and Mr. Stoddard, I would like to ask the question, and that is Ms. Bone stated that there is concern that documents might have been destroyed. That is a passive voice formulation, and it does not say who has those concerns or what the basis is of those concerns. And I am just noting that I have not seen either of those things. So be aware of that.

Mr. Gruen, and then Mr. Stoddard.

MR. GRUEN: Your Honor, I would echo Cal Advocates' point about this being directly relevant, and I think we've explained why. I won't belabor the point. But, I -- I have to strenuously object to counsel for SoCalGas -- SoCalGas' statement that there are conspiracy theories here. We have prepared violations that are based upon

facts. There is a legitimate violation of law here. They are -- they are articulated clearly. We have explained why the need to depose these witnesses as percipient witnesses, just as Mr. Holter is being allowed to be deposed as a percipient witness. They need to -- to -- to be produced here so that we can get to the bottom of whether the hard copy files -- which, by the way, SoCalGas has represented have been provided in the exact same way to SED in electronic format as they existed at the time of the incident; but, we're trying to get to understand if, in fact, that is the case. None of SoCalGas' witnesses can answer that question, and we think that we have a right to answer it. It -- it's directly relevant to the -- the problem that we think and the -- we think the record now shows, which is that SoCalGas' well files for SS-25, 25-A and 25-B are all disorganized. And we think this'll help pin that down. We don't have a direct answer yet to -- to that. We certainly don't have witnesses who can answer questions that go directly to that.

That's all -- that's all I'll say. I recognize -- I don't want to repeat the -- repeat the point, but I think it's critical

to drive home. I will say, if I could, I'm not really clear what counsel's stating that -- that we're doing a -- a deposition as a defense to something. We're trying to uncover facts here, because nobody's been able to answer questions. That is relevant discovery. It's necessary to do in light of the fact that the witnesses couldn't properly testify to these questions in hearings.

ALJ HECHT: Okay. Briefly from Mr. Stoddard. I think people are getting upset, and that happens. But, we are going to be taking a lunch break pretty soon, and that will give us all an opportunity to cool down after we hear from Mr. Stoddard briefly.

MR. STODDARD: Thank you, your Honor.

Briefly again, I'm not -- I'm not going to address the comment that Ms. Bone made, because I -- I agree with your Honor's comment that I -- I have heard that before, and I don't believe there's any evidence of even allegation of that.

However, separately, I think to help -- and -- and this kind of goes to my point about needing to understand exactly what they would be asking to understand whether this is even necessary. Our witnesses have testified that they thought

that the files were scanned in the -- in the -- in the manner in which they were maintained. And now please bear with me. I don't have the testimony in front of me. But, my recollection is that the general statement was they were scanned as they're maintained in the -- in the normal course of business. SED is alleging that, based on their review of the scanned PDF version that was produced to them, they think they're disorganized. All they need to do -- if we -- I mean we've already essentially said that they were scanned -- that they were in the normal course of business. To the degree they believe they were disorganized, they can make that argument based on the version that they reviewed. Right? There's no -- you know, it seems to be that there's a disconnect here, with the idea that the scanners -- you know, again, if they think that the version they're looking at is disorganized, and we've said that that's how it was in the normal course of business, they can make the argument that our files were not maintained in a well organized way in the normal course of business. Again, our argument is slightly different, and it has to do with being able to view the

three-dimensional well file, where the logic of the organization is very different, and where even a layperson can make sense of it fairly quickly.

And I would note, because I think this is important, that Cal Advocates did come and look at the physical well file in this case, and they took the opportunity to look at it. And what I meant by saying that this is a defense is that I believe, you know, in my view, this is a reaction to our argument that SED did not, and they're trying to create a way to say it doesn't matter when, again, their approach contrasts very clearly with the approach that Cal Advocates' analysts took in this case.

That's all I have to say on this. Again, I do think it's important that, to the degree that your Honors are considering this as a serious request that -- that SED should be required to add more specificity to the questions they would plan to ask those scanners so it can be assessed for likelihood to lead to admissible evidence.

ALJ HECHT: Thank you. It does -- okay.

Ms. Bone, you may speak very briefly. I really think that we've heard

enough, and we're going to be breaking for lunch very shortly; but, I will not cut you off.

MS. BONE: I understand. Thank you, your Honor. I just -- since Cal Advocates was mentioned by name, and what they did, I will just be clear that the review of the well files was not comprehensive, and I think that the testimony reflects that. It was a spot check of a number of well files, not just the one for SS-25.

ALJ HECHT: Thank you. Okay. I have heard enough. We are going to take this under submission. We will come back after lunch, and we will discuss it. And I think that I'll leave it there for now.

I hope that everybody has a good lunch break, and we will return at 1:30. Thank you very much.

(Whereupon, at the hour of 12:18 p.m., a recess was taken until 1:30 p.m.)]

* * * * *

AFTERNOON SESSION - 1:30 P.M.

* * * * *

DAN NEVILLE,
resumed the stand and testified further as follows:

ALJ HECHT: We'll be on the record.

We are returning from after lunch. It is Thursday, I believe, the 6th of May. We -- Safety and Enforcement Division has finished their cross-examination of Mr. Neville, and next, we will have cross-examination by the Public Advocates Office, and after that, presumably redirect.

There is one outstanding motion for this morning, and we'll address that first.

To summarize briefly, I think we are being asked to allow or compel unnamed employees of a third-party scanning service so that they can be asked questions about the ordering contents of one or more large file cabinets of documents that they scanned five years ago. Judge Poirier and I have conferred. We simply do not think that that appears reasonably calculated to lead to the discovery of admissible evidence. I could go

into more detail on why I think that, but I don't think that I have to, and I would rather not take the time. Everybody's time is precious, and Public Advocates and SED have both made the point that their time is precious. So I would like to just continue with the hearings now.

Are there any questions before I hand this off to Judge Poirier? Yes.

MR. GRUEN: I'm sorry, your Honor. May I -- I just wanted to clarify. Can -- I'm not sure if I -- if I'm able to be heard.

ALJ HECHT: Yes.

MR. GRUEN: I just wanted to clarify. I caught the tail end of that, and I apologize for missing it. But, I'm wondering if --

ALJ HECHT: The motion --

MR. GRUEN: -- that means -- go ahead.

ALJ HECHT: The motion is denied. I think that's what you're asking. And the motion is denied. We simply do not think that this is reasonably calculated to lead to the discovery of admissible evidence. I hope that that is clear, and I think we can move on.

And Ms. Bone.

MS. BONE: Yes, your Honor; just a

follow-up on that.

While the motion to depose or otherwise cross-examine the scanning people, third-party scanners, has been denied, is there any decision about whether it's appropriate for the parties to ask questions of the witnesses that are being currently -- that are currently testifying here about their experience as percipient witnesses regarding the scanning or the status of the records?

ALJ HECHT: As you have actually been doing that -- or not you, because you haven't done your cross yet. But, SED has, in fact, been doing that, and you can ask those questions to the extent that you might get an answer. I think this morning is indication of where that's likely to go, but -- but, feel free to ask.

MS. BONE: Thank you, your Honor.

ALJ HECHT: Thank you. I will then turn it over to Judge Poirier, and we can start the afternoon. Thank you.

ALJ POIRIER: Thank you, ALJ Hecht.

This is ALJ Poirier. I'll be taking over for the afternoon. I think our next course of business is the cross-examination of Mr. Neville by Cal Advocates.

And let's go ahead and turn to Ms. Bone. Please continue -- please go ahead, Ms. Bone.

MS. BONE: Thank you, Judge.

CROSS-EXAMINATION

BY MS. BONE:

Q Mr. Neville, good afternoon.

A Good afternoon, Ms. Bone.

Q And I am sorry that this has gone on for so long, and I don't intend to prolong it. I do have a number of questions for you, but I -- I move fairly quickly. As I say that, I'm reminding myself to talk slow enough for the reporters.

So to get straight to the point, you testified on Wednesday that, given your experience, you would know what kind of records a company like Boots & Coots would need to perform the well kill. Is -- is that a correct recollection?

A Yes.

Q And is it fair to say that you also know what kind of records are needed to properly maintain a gas storage facility?

A Yes.

MS. BONE: And if Matt Taul could put up on the screen -- is he there? Oh, goodness.

I -- your Honor, I forgot. We should go off the record, I think.

ALJ POIRIER: Let's go off the record.

(Off the record.)

ALJ POIRIER: Back on the record.

Please go ahead.

MS. BONE: So Mr. Taul, if you'd take us to page 2.

Q Mr. Neville, this is your testimony, which I'm sure you recognize, your reply testimony. It's SoCalGas Exhibit 15. And we're just looking at page 2.

And I can barely read it, but can you see it, Mr. Neville?

A Yes.

Q And you testify there, on lines 4 and 5, that SoCalGas' recordkeeping practices provide an efficient means for the operation and maintenance of the Aliso Canyon gas storage facility, and did not cause unsafe conditions. Is that correct?

A Yes.

Q And that is essentially a primary driver of this particular testimony, is it not?

A I would say that, yes, the primary driver is to -- is to explain the recordkeeping in -- in this reply testimony.

Q Okay.
A Yes.
Q And your testimony on that page, if you look further down at around line 20, the heading says, "SoCalGas' well records are organized and maintained to allow for the efficient operation and maintenance of the Aliso Canyon facility by storage personnel." Is that -- is that right?
A Yes.
ALJ POIRIER: Excuse me.
MS. BONE: So the --
ALJ POIRIER: Sorry to interrupt. This is ALJ Poirier.
Mr. Taul, could you zoom in a little bit? It's quite hard to read -- read the text.
ALJ HECHT: This is Judge Hecht. I would appreciate that. I -- even wearing the correct glasses, I cannot discern the words.
MS. BONE: It's still not big enough, Mr. Taul.
ALJ POIRIER: Let's go off the record real quick.
(Off the record.)
ALJ POIRIER: Back on the record.
BY MS. BONE:
Q Okay. So -- so, Mr. Neville, you

testified to the fact that the well records were organized and maintained to allow for efficient operation. Correct?

A Correct.

Q Did you use the well file -- files yourself?

A Yes.

Q How often did you use them, can you estimate?

A Yeah. I've probably -- would use them several times a week for various wells, routinely.

Q And what did you use them for?

A Oh, various practices regarding monitoring. I guess, for an example, would be an anomaly on a temperature survey. I would go to the well file, I would review previous temperature surveys, I would review the well history file to look at the previous work done on the well, the well schematic, and potentially, the well log file to sort out certain anomalies. That -- that's one example.

Q That -- that's fine. Thank you, Mr. Neville. That's helpful.

So is it safe to say that you have a good sense of how the well files were organized?

A I would say, "Yes."]
Q And do you believe that the records that were contained in the SS-25 well file were complete before the incident?
A I have no reason to believe that they weren't complete. I do believe -- based on -- just the fact that I've been in so many well files -- I believe they were complete.
Q You seem to be hesitating there. Is there something else you want to say?
A I think by "complete" -- and I refer to my testimony -- that I believe they contain all of the records that the company had with regard to SS-25.
Q So to your knowledge, did anyone, other than the Aliso Canyon storage personnel, access the well files after the incident occurred?
A I don't have that knowledge. Oh. I'm sorry. Could you repeat. The well files or --
Q Yes, the well files.
A Oh, yes. Others would have access to well files after the incident.
Q And why would they have had access to the well files?
A So some of those -- the well work that's done in a well, those that do that

work, the drilling and workover engineers and the well site managers would access the well files to look at the previous work done in a well in order to plan their work for their upcoming workover.

Q So let's talk specifically about the SS-25 well. Do you know if people other than the Aliso Canyon storage personnel were accessing the SS-25 well after the incident occurred?

A I don't know.

Q So Mr. Neville, you testified earlier today that you know that scanners accessed those files; is that correct?

A I do know that they accessed the well files that were located in the drawers -- in the cabinets that were near the office that I was working in, yeah. So the scanners accessed them, yes.

Q And do you know if other people accessed them other than the scanners?

A Let's see. So the scanners, as I said, drilling and workover people, myself and others that were responding to data requests.

Q And who would those people be?

A I had help with a contracting company as well as some engineers that were

working in the field at the time that -- SoCalGas engineers.

Q So you mentioned -- you seem to suggest that there are well files that are in these file cabinets. Were there other well files available as well for SS-25?

A Well, the SS-25 well file wasn't in a well file cabinet.

Q Where was it?

A I don't know for myself.

Q Was it in the well file cabinets before the incident?

A It was a file that I recall being, yes, in the well file before the incident. I can't say exactly the last time I used the file, but I was in -- into -- I would have noticed if the well file wasn't there. If a well existed in the field, didn't have a well file associated with it, I would have known about it. And so to -- with that knowledge, I know that there -- that the SS-25 well file was in the well file prior to the incident.

Q Is it reasonable to assume that every well would have a well file in the cabinet prior to the incident?

A Yes.

Q So do you have any idea when the well file was removed?

A I don't -- I have -- I would have to make a guess that I don't have an idea of when, no.

Q So you use the well files on a regular basis, more than weekly, several times a week, correct?

A Yes.

Q And you would have noticed if a well file was missing, correct?

A I don't -- you know, I'm not into the well file -- every well file every week. So I wouldn't particularly know if one were missing on any particular -- I wouldn't know when.

Q Do you know who would know when the SS-25 well file was removed from the cabinet?

A It's -- it's my suspicion that the well file was removed by those that were addressing the incident. But I don't -- I didn't have a conversation with them. That would be my suspicion. It's something that I would expect, if they were addressing the incident, that they would want access to the well information. So --

Q And --

A I assumed that they had -- I assumed that those that were addressing the incident had the well files.

Q And are you assuming that those people were SoCalGas employees?
A Yes.
Q And specifically who would that be?
A Well, those responding to the leak, they would be -- and this is -- I don't know for sure who, but those that were responding to the leak were Todd Van De Putt, Bret Lane, Rodger Schwecke, Boots & Coots.
Q And have the -- to your knowledge, have the SS-25 well files ever been put back into the cabinet?
A No. They have not been put back in the cabinet.
Q Do you have any reason to believe that any of the records from the SS-25 well file were removed or destroyed after the October 23rd, 2015 incident?
A I have no reason to believe that.
Q And what about before that date, were records ever destroyed, to your knowledge?
A To my knowledge, no.
Q Do you know what well file records were provided to Boots & Coots?
A I don't.
Q Do you know what well file records were provided to Blade?

A I don't.

Q And do you know what well file records were provided to Cal Advocates?

A I don't.

Q So Mr. Neville, you're the reservoir engineering manager in integrity management and strategic planning for SoCalGas, that's correct, isn't it?

A Yes.

Q And you've held that position since June of 2012, correct?

A Yes.

Q I have a hard time remembering.

A Yeah. I'll have to qualify that. It was -- I was in storage engineering -- I had the same title in two or three different departments, if that helps. I could try to expand on that, if you'd like, but I'll --

Q You don't --

A I don't know. Okay.

Q Can you briefly explain what integrity management is?

A Integrity management is the management of the risks and hazards and mitigation and preventive measures taken to address the threats to the storage operation underground.

Q And your work again has primarily

been on underground storage on behalf of SoCalGas, correct?

A Yes.

Q And even before that you have a fairly extensive resume regarding underground storage; is that correct?

A Yes.

Q Can you briefly explain what strategic planning is?

MR. LOTTERMAN: Can you give him a context, Ms. Bone.

MS. BONE: Yes, it was in the context of that's his title. He's an engineering manager in integrity management and strategic planning. So from that perspective.

MR. LOTTERMAN: Thank you.

THE WITNESS: Yeah. That's the name of the department that I'm in. There's other managers and a director. I don't know if I feel that comfortable saying what strategic planning is.

BY MS. BONE:

Q So you would say that your primary responsibility is integrity management?

A I would say that's correct.

Q Okay. And if we look at page 2 of your opening testimony, SoCalGas-1.

Mr. Taul, if you could bring that

up, and we can see the diagram of SS-25 that's provided there. And I know it's hard to read on the screen.

Mr. Neville, do you have a hardcopy of it in front of you so that you can see it?

Matt, you can try and blow it up as much as possible maybe just for the title and the --

A Yes. I have a copy in front of me too.

Q Great. Thank you, Mr. Neville. So what was the purpose of including this diagram in your testimony?

A The purpose was to try to provide a depiction of what the subsurface piping existed of for the well.

Q So do you think that it was important to making the points in your testimony?

A I do. Yes.

Q So looking at the hardcopy you have, can you read for me the title of the diagram there at the top.

A Well Standard Sesnon 25, API No. 04-037-00776-01. Is that what you're asking?

Q Yeah. And I'm wondering if you could read the text that's on the right-hand side in the corner there. It looks like

"operator."

A Yeah. "Operator: Southern California Gas Company. Lease: Standard Sesnon. Field: Aliso Canyon. Status: Active gas storage." Then there's -- there's the base of fresh water with the acronym BFW, and then there's the USDW, which stands for underground stor -- underground source of drinking water, I believe, subject to check. Then there's the ground elevation, which is somewhat difficult to read.

Q So I was beginning to wonder if you had a different version than I have because I can't read this document. And I'm wondering do you know who created this diagram?

A It was created by a company called InterAct, which is noted. They are a contractor that we use to build our wellbore diagrams. The company is in blue on the diagram. I think one of the issues here is that the diagram was created on a -- at least, to me, it looks like the diagram was created on a full page, and it was shrunk to fit on a half page. And I think that perhaps may be a problem here with -- the words are so -- they are smaller -- or harder to read.

Q It kind of defeats the purpose. Would you agree?

A Well, to the extent -- obviously, if the information is hard to read, it's not helpful, yes.

Q Do you know who provided the diagram of this testimony to -- this diagram to be included in your testimony?

A No.

Q Do you know when it was created?

A It was created some -- in the some weeks prior to the due date of the testimony, and you know, I believe it was the legal department that inserted this document into the testimony.

Q So this morning it looked like -- that SED-298, an exhibit that they put in front of you, has this similar document and that this was a -- no, I don't think that's it, Matt, but don't worry about it.

So this is a current schematic, not one from like 1979, correct?

A Yes.

Q Okay. And do you believe it's accurate?

A Yes, I do.

Q So do you believe that it's complete?

A I think it was -- I believe that it -- that there -- information that is on

the schematic was sufficient to my testimony. I'm not going to say it includes all of the information on a typical wellbore schematic, but it was complete enough to help understand the written testimony, in my mind.

Q Okay. So there has been some discussion over the last few days about crossover ports, and I believe that you testified that there were crossover ports on SS-25?

A Yes.

Q Are they depicted on this schematic?

A They are not depicted.

Q And they are an important component of the well; is that correct?

A Yes, I would say.

Q It's a sub -- a subsurface component of the well?

A Yes, they are. Yes.

Q So why would they have not been included in this schematic?

A I think I provide reference in the testimony to the depth -- it's -- there wasn't an intentional reason not to include them. I think the -- I think the schematic had the major components that I did want to depict, which was the surface casing, the

production casing, the tubing, the packer and such. So it's hard to make the decision, I guess, on, you know, what I should have or should not have included. I did, I guess, what I thought best to try to give an illustration of the substructure of this well.

Q So I believe you testified this morning that those ports weren't included in this diagram but that they would have been included in a tubing detail; is that correct?

A Yes.

Q And do you know if that tubing detail was ever included in other schematics provided in this proceeding?

A I -- I don't -- so a tubing detail is different from a wellbore schematic. So what we're looking at here is a wellbore schematic, and I -- we talked about the 1979 wellbore schematic. A tubing detail is another document altogether that accompanies the -- the drilling and workover history that was -- that was done on the well. There would be a tubing detail after each workover. You know, it would be part of that workover record.

Q And would that kind of information be useful to Boots & Coots, that tubing

detail?

A I -- yes. I -- you know, that's my best assessment as to whether or not it would be or wouldn't be. Yes, I believe it would be.

Q Why do you believe it would be?

A It shows -- it just shows more details than this schematic. It shows the crossover ports. It shows the length of the different components in the tubing.

In fact, if you were trying to kill the well, wouldn't you need information of that type?

A Need -- I don't -- I don't know if I would -- I think that what's here is -- at least for a routine well kill that, you know, I'm familiar with, I think the components are there. Well, not this schematic. This was for the testimony. The schematic for the -- was -- that we've seen before in 1979, I think, it's sufficient.

Q Okay. Can you tell me if SoCalGas would have had in its well file any single diagram that shows all of the subsurface components of the operational wells at Aliso Canyon? Or you had another word for it. It's not a diagram but the tubing detail. What was the other term you used for the

tubing detail?

A I think that's the term I used was the tubing detail.

Q Okay. So would the -- let me restart that.

Would the well files all contain up-to-date tubing details that show all of the components of the subsurface components of the well?

A I would say yes. You know, that's the practice. I would say that that would be the case. They would either be in the hardcopy well files or in Wellview for some of the more recent work that was done.

Q So would that have been one diagram or -- tubing detail, or would it be several pieces of paper or screens?

A Typically it's one sheet of paper.

Q Mr. Neville, for the well file records to be useful to you in your job as an integrity management person, do you believe that such records need to be accurate?

A Yes.

Q Do you believe that those records need to be complete?

A Yes.

Q Do you believe that those records need to be organized and in a manner that you

can easily access them?

A Yes.

Q Has, to your knowledge, SoCalGas taken steps since the incident to create diagrams showing all of the subsurface components of the operational wells at Aliso Canyon?

A Are you asking me post-incident?

Q Post-incident.

A Yes, I am aware of that. Yes.

Q And prior to the incident, did such records exist?

A Yes, the records existed.

Q And where did they exist?

A So by "records," I'm talking about the workover histories that are used to generate a depiction that we're looking at. It's a wellbore diagram. So those records existed in the well file.

Q Including Wellview, correct?

A Including Wellview.

Q Right. Mr. Taul, if we could go to page 4.

In your opening testimony, you explain that as of October 22nd, 2015 -- and this would be -- yeah, at around line 6 you can see there -- active UGS wells at Aliso including SS-25 were subject to a systematic

well integrity monitoring and inspection program.

Do you see that?

A Yes.

Q I have a few clarifying questions about this testimony, and you list a number of activities that were performed on a weekly, monthly and annual basis after that; is that correct?

A Yes.

Q So I'm unclear on the language that you use "as of October 22nd, 2015." Did this program that you're describing start on October 22nd, 2015, or had it been in existence up to that date?

A It has been in -- I guess the reason that date was used was to try to demonstrate -- this was the practice as of the date prior to the incident. So it existed -- this practice existed before that date. It didn't start on October 22nd, but this was the practice that was in place on that date.

Q And that practice included all the inspections that you describe in the text that follows, A, B, C, D, E and F on pages 4 to 6. If its helpful, Mr. Taul can scroll you through it, or you can look at your

hardcopy. So this procedure or this program that you're describing would have included all of these things?

A Right. That was a program in place as of that time. At that time period, this was the practice.]

Q And what was the name for this program?

A The summation of all those, A through F, that would be the monitoring program.

Q So was this the program that's referred to as SIMP, S-I-M-P, the Storage Integrity Management Program?

A No.

Q So this was just referred to as the monitoring program?

A Yeah. It was the Aliso Canyon well monitoring program. I don't know if we had a formal name to it. There were all these activities associated with monitoring.

Q I understand that there was a pilot program called a SIMP, which stood for Storage Integrity Management Program.

When was that put in place?

A Yes. I didn't include that in my testimony. The pilot -- for one reason, I wasn't involved with the pilot program for

SIMP, but my recollection was that it was in 2014 or early 2015 subject to check. The pilot program was started before the incident.

Q But you're the integrity management person for the storage facility; correct?

A I am now. At the time I was not in 2015.

Q Oh, what were you doing in 2015?

A I was in a different group altogether. I was in a group called Storage Asset Management, which was a group outside of underground gas storage.

Q So who is the person who testifies about the TIMP -- or the SIMP? Sorry.

A I'm not sure. I think that I would -- I'm trying to think of the testimony who covered SIMP. I think it would -- yeah. I don't know.

MR. LOTTERMAN: Ms. Bone, would you like me to answer that question?

MS. BONE: Yes, Mr. Lotterman.

MR. LOTTERMAN: Amy Kitson.

MS. BONE: Thank you.

Q So I'm a bit confused, Mr. Neville, how you are in a position to testify as to what was in place in terms of integrity management at SoCalGas at the Aliso Canyon

facility prior to the incident.

A I'm testifying with regard to the O&M practices that were in place prior to the incident. I had started in storage engineering in 1991 and basically had 28 years of various positions within storage engineering, including storage engineer at Aliso Canyon. I was the storage engineer at two other fields. I was a drilling and workover engineer. So I have quite a lot of experience in O&M practices so I understand well construction and the monitoring practices that were in place prior to the incident. It just so happened that at the time of the incident I was in another group for about a year or so.

Q And as part of that other group, were you accessing the well files?

A Not at Aliso Canyon. The work I was doing at that time was in a different storage field.

Q So when we talked about accessing the well files previously, what time period was that?

A That would be 2007 to about 2014, mid-2014.

Q Okay. And this Aliso Canyon well monitoring program that you describe in your

testimony at about pages, I think 2 to 6, thereabouts, in your opening testimony, do you consider that to be an integrity management program?

A An integrity management program, I would say, would include that plus what has been referred to as API-1171.

Q Let's look at Public Advocates' Exhibit 407 at the bottom of the first page. It recites there something from SoCalGas' March 20, 2020, testimony. It was not your testimony. It was Kitson and Hower's, but I'd like your take on this. It says:

> Prior to 2007, SoCalGas did assess risk as part of ongoing operations, even if it was not documented as a formal risk assessment program. This was consistent with the standard practices of other operators. Second, starting in 2007, SoCalGas had a formal risk assessment program which focused on wellbore integrity management. SoCalGas implemented a 'Replace and Inspect' initiative.

Are you familiar with this Replace and Inspect initiative?

A Yes.

Q Can you confirm that it was started in approximately 2007?

A Yes.

Q So were you helping to implement this program?

A Yes, I started in Aliso Canyon in 2007 and so was part of the engineering group that started this type of program.

Q Would you consider this to have been an integrity management program?

A I guess when you mentioned the integrity management program, you know, I'm envisioning, you know, a comprehensive -- every well assessing hazards and risks such as laid out in API-1171.

This is an integrity management program, not that it's specific to the wells that we were working on at the time. To the extent that we were -- when we ran -- worked on a well, we were replacing every component that we could in the well and running casing inspection logs. So that is integrity management.

Q But integrity management as to an individual well, not as to all of the wells in the field?

A Right. These were integrity

management programs done on the wells that we were -- we had workover rigs on and had the ability, during the workover, to do this type of work.

Q So this was on wells that were already identified as needing work, but the program did not proactively identify other wells that perhaps also needed work?

A Not this program, right. This program was -- the 2007 Replace and Inspect was with regard to the wells that we were already working on and, as you said, not the -- all of the wells in SoCalGas' operation.

Q Do you know, was this program ended?

A No. It really -- the SIMP program picked up this type of management and applied it to all of the wells in the company's operations at all of the storage fields.

Q And when did the SIMP program do that?

A So as we discussed earlier, there was a pilot project done in 2014/2015 and SIMP started in 2016.

Q So at that point, did SIMP then pick up the work that was being done in this Replace and Inspect initiative and it was

incorporated into the SIMP as well?

A Yes, because the SIMP was on every well and so this work is a subset of every well, so the SIMP program basically took this program over.

Q This Replace and Inspect program -- were ultrasonic inspections, or USIT, part of the Replace and Inspect program?

A Yes.

Q And do you know how many ultrasonic inspections SoCalGas ran for each year of the program approximately?

A Is this for Aliso Canyon?

Q Yes.

A I'm thinking it's -- subject to check, I think it was between three and five a year.

MS. BONE: Mr. Taul, could you take us to response to Question 3 just so we can see what we've got here.

Q These are questions about the Replace and Inspect program that were implemented in 2007. Does this data request even look familiar to you or data response?

A Sometimes I -- it looks vaguely familiar.

Q Would you have been maybe one of the people who were consulted to answer

questions like this about how many Replace and Inspect, you know, programs or -- were USIT -- sorry -- were implemented pursuant to this program?

A I could have been, yes.

Q Okay.

Mr. Taul, if you could put up SoCalGas-153.

Mr. Neville, I hope that this one will be familiar to you. It looks like a memo that you wrote regarding the reliability of Vertilog inspections in November of 1991; is that correct?

A Yes.

Q If we go to the bottom of page 1 of this memo, you wrote:

> The Western Atlas tool may not be functioning as specified in the Atlas literature. This may be due to --

And if we roll onto the next page --

> -- the inherent characteristic of the tool itself, or to a poorly calibrated tool used on the job. In order to counter this possibility, Western Atlas has decided to have their research

group in Houston review the job. Their report will be attached when the work is completed.

Do you see that?

A Yes.

Q And do you recall that memo, Mr. Neville?

A I do recall the memo, yes -- or are you asking do I recall the report?

Q That's -- you are cutting to the chase. Were you aware that Cal Advocates asked SoCalGas to provide a copy of the follow-up Western Atlas report to it on March 26, 2021, in our Data Request 49?

A Yes, I was aware that this report was requested. Yes.

Q Okay. And did you help respond to that Data Request 49?

A Yes.

Q And were you asked if you had the report?

A Yes.

Q Did you have it?

A No.

Q Do you know where we might be able to find it?

A My recollection is the report was never done. I don't ever recall seeing a

report from Western Atlas. I have a lot of recollection of the work I did for this memo and writing the memo and the discussions I had with Western Atlas, but I don't ever recall receiving a report back from them.

Q Would you have expected them to send you a report if they had written one?

A Yes, I would have.

Q And did you ever receive any kind of a memo or any information that resolved this issue of whether the reliability of the Vertilog inspections was due to an inherent characteristic in the tool itself or a poorly calibrated tool?

A The representative there that I worked with didn't have an answer and I didn't get a report, to my recollection, so I -- I guess that's all I have to offer. I was disappointed that I never saw a report. I was disappointed in the tool and I was disappointed that I didn't have a report.

MS. BONE: Matt, if you could bring up CalPA Exhibit 411.

ALJ POIRIER: Ms. Bone, this is ALJ Poirier. I just want to check for the sake of timing the break. How much more cross do you have?

MS. BONE: I have a couple more

questions to bring this to a close, and then I probably have about another 15 minutes. So I would suggest that we finish this and then take a break and then come back.

ALJ POIRIER: Okay.

MS. BONE: How's that?

ALJ POIRIER: Okay.

MS. BONE: So, Matt, if you could go to Response 1. --

Q As you indicated --

Are we back on the record?

ALJ POIRIER: Yes. We never left.

BY MS. BONE:

Q You indicated that SoCalGas was not able to find a Western Atlas report. Do you have any sense of the kind of reviews SoCalGas would have done to locate this document other than reaching out to you?

A I have a sense, yes, that they would have done more than just reach out to me.

Q Do you have a sense of what that would have been?

A It would have involved searching the scanned records the company had in place for Montebello and the other fields, I suspect. That's my sense for what would have been done.

Q So that's your speculation, but you don't know if anything more was done?

A Right.

Q Do you think it's possible that a Western Atlas report exists in SoCalGas' records?

A I don't believe there is a report. I'm very close to being positive that I never received one. This is -- 1991 was a long time ago. As I say, I remember the work done, I just don't remember ever getting a report.

MS. BONE: So now is a good time for a break.

ALJ POIRIER: Let's make this a 10-minute break until 2:41. We'll be back then. Off the record.

(Off the record.)

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

We are just returning from a short afternoon break. When we left off, Cal Advocates was cross-examining Mr. Neville and will continue. We indicated that we will go to about 3:45 today and allow for any housekeeping.

Please continue, Ms. Bone.

///

BY MS. BONE:

Q Mr. Neville, hello. We're almost over. We're almost done.

API-1171, you referred to it as part of an integrity management program; is that correct?

A Yes.

Q But API-1171 wasn't even adopted until 2015; is that correct?

A If I recall, I think it was published in the late part of 2015, which would be September or October.

Q So it would have been adopted after publication at some point?

A Oh, I see your question. Yes, it was adopted by PHMSA even later than that. I'm not even sure when the date was.

Q Okay. But you believe that that's an important component to an integrity management program; is that correct?

A I do. I believe it's a, you know, well-thought-out, comprehensive program of integrity management.

Q You've testified that the records for Well SS-25 do not show that there were any leaks; is that correct?

A Yes.

MS. BONE: Mr. Taul, if you could pull

up a document that Mr. Neville has seen before, today and yesterday I believe, Exhibit SED-274.

Q Do you recall this document?

A Yes.

Q And it has handwritten notes on a diagram of Well SS-25 that states something to the effect of suspected hole at approximately 500 feet in 7 inches; is that correct?

A Yes, I see that.

Q Do you have any idea who wrote these notes?

A No.

Q But this isn't your handwriting; correct?

A No.

Q Do you think that the reference to 7 inches refers to the production casing?

MR. LOTTERMAN: Objection, calls for speculation.

ALJ POIRIER: Overruled. The witness can answer to the best of his knowledge.

THE WITNESS: All right. Let me take a close look at it since it wasn't my writing. "Suspected hole at approximately 500 feet in 7 inch." It appears to be the 7-inch casing.

///

BY MS. BONE:

Q Could it be referring to something else that you can think of?

MR. LOTTERMAN: Same objection.

THE WITNESS: Yes.

ALJ POIRIER: Mr. Neville, just answer to the best of your knowledge. "Yes, no, I don't know" are all acceptable answers.

THE WITNESS: Oh, I don't know.

BY MS. BONE:

Q And do you know whether there was a suspected hole in SS-25 at approximately 500 feet?

A I don't know.

Q So you never became aware of a hole actually being there?

A No.

MS. BONE: Mr. Taul, if you could put up SoCalGas Exhibit 153 again.

Q Mr. Neville, this is your famous Vertilog memo.

A Okay.

Q You expressed concerns about the use of Vertilog in this memo, didn't you?

A Yes.

Q If you had learned that the issues were related to a failure to properly set the Vertilog tool, would that have made you feel

better about this situation if it had been a calibration issue?

A It would have had to have been some report because it was so far off in its finding the wall loss. It was -- it had classified a 60 to 80 percent wall loss feature which never even existed. So it's hard for me to say that it would be a calibration issue it was so far off. But I gave the contractor the benefit of trying to determine, you know, why it was -- why we saw the results that we did and I just never remember even getting a report back from them.

Q So other than Vertilog, what other alternatives were available to testing the integrity of SS-25 in the 1990s?

A So the Vertilog was a casing inspection tool. There were other casing inspection tools that use the same type of technology. I wouldn't -- I think Mr. Carnahan would probably be best to cover that, but my understanding is that it was all the same type of Vertilog technology.

Q And did SoCalGas use any of those technologies to perform tests on SS-25 in the 1990s?

A No.

Q Did it use those tests on any of the wells at Aliso Canyon in the 1990s?

A So by tests, you're talking about a casing evaluation tool?

Q Yes, a casing evaluation tool.

A Yes. So the company did use casing evaluation tools in the 1990s at Aliso Canyon.

Q And what were those?

A I know in the 1990s they included both magnetic flux type tools and ultrasonic, but I think it would be worth checking the records to get an accurate answer as to exactly what tools were run when.

Q Did SoCalGas use other casing evaluation tools on SS-25 in 2000?

A No.

Q Did SoCalGas use a casing evaluation tool to inspect SS-25 in 2005?

A No.]

Q Do noise logs detect corrosion in a pipe?

A No.

Q Do temperature logs detect corrosion in a pipe?

A No.

Q Do RA tracer surveys detect corrosion in a pipe?

A No.

MS. BONE: Your Honor, this concludes my cross-examination of this witness.

Thank you very much, Mr. Neville.

ALJ POIRIER: Thank you, Ms. Bone.

I think now we will move to redirect by Mr. Lotterman.

And who should have the presenter ball for --

MR. LOTTERMAN: Mr. Moshfegh.

ALJ POIRIER: Go off the record.

(Off the record.)

ALJ POIRIER: Let's go back on the record.

We're going to be moving to the redirect of Mr. Neville by Mr. Lotterman of SoCalGas.

And please go ahead.

MR. LOTTERMAN: Thank you, your Honor.

REDIRECT EXAMINATION

BY MR. LOTTERMAN:

Q Mr. Neville, we're in the fourth quarter, if not the two-minute warning, so hang -- hang in here.

A Okay.

Q Let's -- let's stay with Ms. Bone's SoCalGas Exhibit 153, shall we?

A Okay.

Q I'm not sure if Mr. Moshfegh has that on his -- on his list.

But, could you -- could you tell the -- the judges the context as to -- as to what prompted your writing of this interoffice correspondence in November of 1991?

A So -- yeah. So I was asked by my supervisor to make a comparison of the Vertilog to -- on a string of casing that was being pulled from the well. It was in a string casing, so we would have a chance to check the Vertilog against a visual on-site surface inspection.

Q Was that an unusual opportunity?

A It -- it was not -- it -- it -- it's unusual in -- in the sense that most casings are production casings, and they're cemented in the well. This happened to be an inner string casing, and it could be removed.

Q So could you explain how one is able to remove an inner string casing relatively easily, and -- and not a production casing?

A So production casing is -- is cemented in place. It's nearly impossible to remove. Inner string casing is -- it's just hung with -- inside of the production casing.

It's -- and it's only landed in a packer at the bottom of the well, so it's removable.

Q Okay. And once you removed the inner string on this particular well at the Montebello facility, what did you do next?

A So I can -- you know, backing up to that, with the -- the first thing we did was to run a Vertilog through the -- the inner string, and so we got our Vertilog of the inner string while it was in the well, and -- and then it came time to pull the -- the inner string from the well, and by that time, I had had the Vertilog analysis results, and the -- the different class IIIs and IVs, you know, I was noting and looking for on -- on the inner string as it was retrieved from the well, and -- and I actually remember being there, and -- and -- and laying the pipe down on -- on the ground, and measuring out where the wall loss features should be, and I remember, on one of them, it was a -- supposed to be a class IV feature. It was a -- it was a scratch on the pipe at -- at that point. And it was that that caused the, you know, further investigation into, you know, our questioning Western Atlas.

But, then we sent the pipe into our pipe yard, and they have facilities to run

the pipe through inspections on -- on -- at surface to -- to check the condition of the pipe against the Vertilog.

Q And what is a class IV metal loss?

A It's a 60 to 80 percent wall loss feature, if -- and it was external.

Q And is it your testimony that when you laid the pipe down alongside the Verti- -- Vertilog results, the Vertilog indicated a 60 to 80 percent wall loss, and all you found was a scratch?

A Yes.

Q Okay. Were there other kind of false positives observed during this process?

A Yeah. I believe there were two class IVs and several class IIIs, and none of which existed.

Q What is a class III?

A A -- a class III is a -- a 40 to 60 percent wall loss feature, again external, in -- in this case. And I think it's in the report. But, none of those were in the range that the Vertilog had estimated; in fact, they were grossly overexaggerated.

Q Did the Vertilog tool that you used in November of 1999 miss wall loss that actually was on that pipe?

A Only very -- only within a few

percentage points. I don't think there was anything over 20 percent. It was -- it slightly underestimated wall loss in this case, but grossly overstated wall loss.

Q And who is Mr. R.A. Skultety, the recipient of this interoffice memo?

A He was my supervisor at the time.

Q Okay. And upon completion of this project in 1999, what was your personal assessment as to the accuracy of that particular Vertilog tool at Aliso Canyon -- at SoCalGas?

A I -- I was -- after seeing what I saw with the Vertilog, I -- basically, I had no confidence in the log, at least on pipe that you couldn't double-check.

Q And how often is that possible?

A It's not possible in production casings.

Q All right. I want to ask you a couple questions that Ms. Bone asked you about SoCalGas' Replace and Inspect program, and she -- I don't even think we need to put this up, but she noted that in Cal PA Exhibit 407, in response to question three, SoCalGas wrote "Between 2007 and 2013, SoCalGas ran, on average, 3.57 ultrasonic inspections per year at Aliso Canyon." So I've done that

math. Seven years times 3.57 is 26 and change, subject to check, which I -- I see you've learned that term, as have I.

So is that your recollection, that between 2007 and 2013, SoCalGas ran roughly 26 to 27 inspections as part of its Replace and Inspect program?

A Yeah, I -- I'd go with the number to be somewhere in that vicinity, in the 25 to -- 24 to 26 range, subject to check.

Q All right. And can you remind your Honors the total number of wells at Aliso Canyon during that time period, gas storage wells?

A 116.

Q Okay. So if I do that math, subject to check, Mr. Neville, I get about -- just about 25 percent. Is that consistent with your recollection?

A Yes, that would be -- between 20 and 25 percent.

Q All right. Let's -- let's -- let's continue, sir. I want to make sure that we all are on the same page with definitions here, because there's been a lot of terms being thrown around over the last couple of days, and I want to make sure that at least we understand your definition of those terms.

What do you mean by a hard copy well file?

A A hard copy well file is -- refers to the -- basically, the filing system that was set up at the very beginning of operations of the field before the computer even came into place, and it -- it refers to the -- the well files in hard copy form, the well files having four components associated with each well file, and each of the cone -- components having a certain function or use relative to how well files are used.

Q And you lay out a description of that, of those hard copy well files, in your prepared reply testimony, which has been marked as SoCalGas Exhibit 15?

A Yes.

Q Okay. And I don't want to belabor that point.

Would you -- would you tell us where those files are -- are kept, typically?

A Typically, they're kept in the same office as the storage field engineer that -- that resides at the storage field at Aliso Canyon.

Q Okay. And I believe in response to some of Ms. Bone's questions, you explained sort of how they're routinely used, and you

indicated that you, in fact, had used them yourself over the course of your years at Aliso -- at SoCalGas in underground storage. Did I hear you correctly?

A Yes.

Q All right. So tell us, then, about the electronic databases. What are they, and -- and -- and how do they relate, if at all, to the hard copy well files?

A The one electronic database was called PI. It was used for the operational data that -- the many op -- operational data coming into the -- the central plant. It included, you know, pressure data from the -- from the wells. It included the operational data that the storage field engineer would need to set the withdrawal and injection schedules for operations to use. It served as the database for operations data.

Q Okay. And what is Maximo?

A Maximo serves as a database for the maintenance data, work scheduling and tracking for the wellhead and surface equipment in the -- in Aliso Canyon.

Q And we've talked a bit about WellView, but I would -- if you wouldn't mind, would you briefly summarize what use WellView has in the operations and

maintenance at Aliso Canyon?

A Well, WellView was a -- or is a computer software database that -- that is designed to collect and maintain the subsurface data of a well. It was ultimately designed to -- to replace the hard copy well files, the -- the hard copy well history file.

Q Okay. And have you, during the course of your career at SoCalGas, used the elec- -- these electronic databases in performing your functions?

A Yes; not so much Maximo, but definitely PI and WellView.

Q Okay. And -- and -- and how are they accessed, via computer?

A Yes, at my desk.

Q Okay. All right. And there's been a number of questions about the location of various slots in the tubing in SS-25.

Where would you look in the SS-25 well file to find that data?

A I'd go to the last workover, the 1979 workover, and look at the tubing detail associated with that workover.

Q And have you seen that information in that well file?

A Yes.

Q All right.

Mr. Moshfegh, let's turn to SED Exhibit 298, please.

I just want to walk through, Mr. Neville, very quickly, some -- some diagrams that have been questioned you on, and I want to make sure I understand chronologically what's going on here.

Let's start with SED-298, and if we would turn to page Bates stamped ending 4226. Mr. Moshfegh, can you enlarge that, perhaps?

All right. So there's the Bates number. Do you see the date on that, Mr. Neville?

A Yes, 4-26, 1979.

Q Yeah.

And then, Mr. Moshfegh, if you would just back out a minute so Mr. Neville could look at the document in its totality.

And I'm sorry. I should have a hard copy in front of you, sir. But, so, there have been a number of questions asked about this document. I just want to make sure everyone understands what it is.

Is this a depiction -- well, let me ask you this: What is this document?

A This is what we call a wellbore schematic.

Q Where would you find this document?
A It would be in the well file.
Q Okay. Under which --
A In the --
Q Under which of your sub files?
A The well history file.
Q Okay. And is the date, 4-26, 1979 -- does that tell you something about this particular schematic?
A Yes, it -- it's a date that follows the workover done in -- in February 1979. So it would be -- in my opinion, it would be the schematic that -- the most updated schematic for this well.
Q Okay. And let's --
A And let me clarify that. I mean it would be the schematic that was built based on the workover at the time.
Q Okay. Thank you for that clarification.
Mr. Moshfegh, let's -- let's bring up SED-279, please.
All right. Mr. Neville, you've also been asked about this document. And for information purposes, we're turning to page 2, with the Bates stamp numbers ending 0067.
Do you see the date on the bottom

of that document?

A Yes.

MR. LOTTERMAN: Okay. And let's -- let's zoom out a little bit so Mr. Neville can see the entire document.

Q Is this also a schematic from the SS-25 hard copy well file?

A Yes.

Q Okay. And do you know why a new schematic was created what looks like seven years after the workover in 1979?

A Yes. There's a -- a note on this schematic that wasn't there on the schematic drawn in 1979, and that note reads: "Unable to use lower nipple, used M-lock for subsurface safety valve nipple, see wire-line tickets."

Q Okay. And to be clear, would you expect and do you believe that both of these schematics that I've shown you, SED-298 and SED-279, are in the SS-25 hard copy well file?

A Yes.

Q All right.

Let's go, Mr. Moshfegh, to SED-274, please.

Now, at the risk of -- of talking this one to death, I want to go through it

very quickly, so we're all on the same page.

I believe you testified earlier both to questions by Mr. Gruen and Ms. Bone that although you recognize the underlying document, which apparently is -- looks to be the same as SED Exhibit 279, you do not recognize the handwriting. Correct?

A Correct.

Q Okay. And can you tell the judges what was going on as of November 10, 2015?

A It's a -- after the incident of October 23rd. The well was being killed, in the process of being killed.

Q Right. So as of November 10, 2015 that leak was still uncontrolled. Is that right?

A Yes.

Q All right. I'd like to show you a -- a document that we were able to pull out of a database; in fact, I believe it was produced pursuant to a data response. This one has been marked as SoCalGas-167.

Mr. Moshfegh, if you would -- actually, let me give the Bates numbers for the record. It's SoCalGas-167.0001 through 0003. And if you would go to the -- let's work backward on this one. Thank you. So --

MR. GRUEN: Your Honor, if I may, may I

insert an objection and be heard on that?

ALJ POIRIER: Go ahead.

MR. GRUEN: Your Honor, it is our understanding this appears to be a redirect exhibit, and it was our understanding during the redirect of Ms. Felts that redirect exhibits were not going to be allowed. So we would assert an objection to SoCalGas using a redirect exhibit at this time.

ALJ POIRIER: Mr. Lotterman?

MR. LOTTERMAN: Your Honor, I believe this should be the exception to that rule, and I'll tell you why, is -- because I think I will establish in a minute. This is actually a full version of what Mr. Gruen and Ms. Bone were using as SED-274. So I don't view it as a new exhibit. I view it as a complete exhibit.

ALJ POIRIER: Okay. We're going to allow this to move forward.

Mr. Gruen, you can raise an objection when the exhibit's moved at that point.

MR. LOTTERMAN: And -- and -- and to be clear, your Honor, I do not plan to move this exhibit into evidence. I just want to make sure that Mr. Neville understands the circumstances surrounding this -- this

schematic.

ALJ POIRIER: Okay.

MR. LOTTERMAN: Mr. Moshfegh, if you look --

ALJ POIRIER: It looks like it's the same document, so let's -- let's go ahead and move forward.

MR. LOTTERMAN: Thank you.

Q So -- so getting back to this document, Mr. Neville --

MR. GRUEN: Your Honor, may -- may I just be clear, just for the record, I believe the second page of the document is -- is the same. The first one is the addition, if -- just to be clear, for the record.

ALJ POIRIER: Okay. It sounds like the earlier exhibit was an excerpt of this. So I think that's the -- so let's go ahead and continue.

MR. LOTTERMAN: All right. So -- and -- and I'll try to be as clear as possible, Mr. Gruen. I appreciate that.

Q Mr. Neville, turning to the third page of SEG (sic) 167, do you see the schematic with the same handwriting that we looked at earlier on Exhibit 274?

A Yes.

Q All right. And if you work

backward from that, I see very little of -- information on page 0002 besides sort of a footer.

So let's go to page 0001, and Mr. Moshfegh, if you would just go up to the message to, from, et cetera, and get that as large as you can.

Can you read that, Mr. Neville?

A Yes.

Q So I have a -- it's a very simple question, but I need to -- I need to lay a little predicate here.

This appears to be an email from Todd Van De Putte to Bret Lane sent on November 10, 2015, and you see the subject date. And do you see the attachment description?

A Yes.

Q Okay. Do you recognize this document?

A No.

Q Okay. So -- so although you recognize the -- the schematic attached, you don't recognize the handwriting, and you cannot identify the -- the email that attached the schematic and handwriting. Is that correct?

A Yes. I -- no, I cannot -- I cannot

recognize that.

Q All right. So here's my question for you: Is it possible, in your experience, for a SoCalGas employee to a copy -- to copy a schematic from the well file, make notations on it, and then send it as an attachment to another SoCalGas employee?

A Yes.

Q Okay. Would you consider that attachment part of the well record?

A No.

Q Was it SoCalGas' practice, Mr. Neville, to, from time to time, combine all the sub files in its hard copy well file, and put them in chronological order?

A No.

Q Why not?

A It would defeat the efficiency and the effectiveness, I think, for using the -- the well files. They're --

Q Are -- excuse me. I'm sorry.

A -- organized the way they are for a certain reason, and I think it would make them a lot more unusable.

Q So, as far as your understanding goes, and -- and your experience, does SoCalGas have any well files, hard copy well files, that are put completely in

chronological order, notwithstanding the type of document involved?

A No.

MR. LOTTERMAN: All right. Let's turn to Exhibit 275, Mr. Moshfegh, SED-275.

Q And Mr. Neville, just to orientate you on this one, I believe Mr. Gruen asked you a series of questions about this. Do you remember that?

A Yes.

Q So do you have any personal knowledge as to why this particular document was generated in February of 2016?

A No.

Q Okay. Does it appear to be signed?

A No.

Q But, if I understood your earlier testimony, do you recognize the format of the document?

A Yes.

Q How is this format used by SoCalGas?

A It's -- it's used to -- to -- to capture the -- the -- the daily work history associated with workovers that are -- that are required by DOGGR, and it's also used to capture daily activities that are not required by DOGGR.

Q So let's -- let's take the first example. Explain what -- what sort of information would be on a document that would, in fact, be submitted to DOGGR using this format.

A So workovers that are done pursuant to a permit would be -- the form would be used to that, and then basically that involves work that is done to the well that -- that makes a modification of the casing.

Q And if information is gathered that does not entail a modification -- when you say, "casing," you're talking about the production casing?

A Yes, the production casing.

Q Okay. All right. So if information is gathered that does not involve a modification to the production casing, is that information that DOGGR requires to be submitted to it?

A No.

Q And is this the -- is this the type of format that SoCalGas uses internally to generate and circulate and socialize information?

A Yes.

Q And is it your understanding -- is

it possible to generate in February of 2016 activities that occurred in, say, 2007?

A Yes.

Q Have you done that yourself?

A Yes.

Q All right. There was a -- there was some -- let's move on to a different topic.

There was a discussion earlier about well kills, and -- and you used the phrase, routine well kill.

Would you explain what a routine well kill is, and when it's needed?

A By routine well kill, we -- we refer to the well kills that are done prior to moving in a workover rig so that the well can be put into a safe condition to work on.

Q And what type of information do you need in order to conduct that safe operation?

A Information in the well file, which would include such items as the wellbore schematic, tubing detail, workover histories, items that are in -- in the well file or in WellView.

Q And why is that type of information important for a workover?

A Well, it -- it really sets the program. One needs to know the depths of

the -- the packer, how much tubing to pull out of the well, what to expect to receive when pulling the tubing out of the well, and -- and it -- and at the same time, it need -- one needs to decide what's going to go back in and replace it.]

Q And when you reviewed the SS-25 hardcopy well file in preparation of your testimony in this proceeding, did you see that information in that file?

A Yes.

Q Okay. Now, do you need to review that type of information if you are conducting a tempered noise log on a well?

A No.

Q Why not?

A I'll say not necessarily. It's -- one does need to have a wellbore schematic to give to the operator which will let the operator of the wireline unit that's running the temperature survey know such things as, you know, where the bottom of the tubing is and how deep the well is, and things like that. So wellbore schematic is important there to.

Q Back in your drilling and workover days, did you conduct routine well kills?

A I did. We're talking early 1990s.

Q Okay. And as part of that effort, would you go into a well file and pull the necessary data?

A Yes.

Q All right. I'd like to talk a little bit about jarring because I'm not quite sure I understand what it is. So I'd like to just have a couple of questions to flesh that out a little bit. You said that it was common to run jars when working on a well. What did you mean by that?

A Well, in a wireline operation, you're running a wireline tool down 8000 feet of tubing, and you're running a tool and many times that's just slightly undersized with regard to the tubing. There's not much clearance. So it's not unusual to have the tool get hung up on something in the pipe, but peat, you know, bridget (phonetic) sand or piece of scale or something. So in wireline operations, it's common practice to include a set of jars on the wireline tool just in case that happens.

Q And are there other ways to address instances where the tool can't get down the pipe besides running the jar?

A Yeah. If the jar -- typically, if you can't jar it through and run it cleanly

through, you'd come back out of the well with the wireline tool, and you would then try to run something like scratchers or brushes or something across that section to clean it up. It might even involve putting some -- spotting some solvent or (inaudible) or something to try to clean up anything that might be hanging up that -- the wireline tool. So, yes, there's different practices that are done, and eventually the hope is that you'll get the obstruction cleared and you'll be able to run the wireline tool free -- freely.

Q And were those practices that SoCalGas performed, whether jarring or otherwise, were those, in your experience, common practices in the petroleum engineering world?

A Yes.

Q All right. There was a discussion with Mr. Gruen earlier about a particular kill system, and I believe you talked about it being at the surface of the well and not downhole. Do you remember that line of questions?

A Yes.

Q Okay. And I just want a quick explanation. Would you explain how that kill

system is different from, say, a deep-set subsurface safety valve like some of the housings that we saw in SS-25?

A Let's see. Are you talking about maybe the surface safety system?

Q Yes.

A Instead of the kill system?

Q Yes. I'm sorry.

A Yeah. So that -- yeah. The surface safety system is really designed to protect -- to shut the well off at the surface in the event something happens in the piping downstream of the well. It's an -- it won't shut off the casing. It only shuts off flow to the surface, the horizontal piping at the surface.

Q And how does that differ from a deep-set subsurface safety valve in the bottom of a wellbore?

A A deep-set subsurface safety valve that -- would be set at the top or close to the top of a storage zone. That -- the concept there would be that it would shut off low into the well itself, the tubing and the casing, and shut the well off at a closer point to the reservoir -- in fact, right above the reservoir.

Q And how do those two safety systems

differ from a shallow set subsurface safety valve as you talked about with Mr. Gruen yesterday vis-à-vis landslide hazards?

A So a shallow set safety valve is -- goes a little further than a surface safety valve in that it will shut off flow in case the wellhead were completely damaged. It protects any issue or leak at the wellhead itself. And these things are typically set between 100 and 500 feet deep.

MR. LOTTERMAN: Your Honors, I have one more line of questions, but it's going to take more than 15 minutes. Would it be prudent perhaps to stop here, and then I can gather my notes and we can -- I know Mr. Neville is not going to want to hear this -- but to start with him for just, you know, 15, 20, 30 minutes in the morning and then we can move on to the MHA witnesses, Mr. Hower and Mr. Stinson?

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

(Off the record.)

ALJ POIRIER: So back on the record.

We're going to pause for the day. When we reconvene tomorrow, there will be some additional redirect and then some additional re-cross from SED and Cal

Advocates. I've asked the parties to organize their exhibits and try to smooth that process so we can save some time. After that, we will move to Mr. Hower and Stinson and what we can get there.

And I think that's all for housekeeping and -- matters. So we'll reconvene tomorrow at 10:00 a.m.

And we will be off the record.

(Whereupon, at the hour of 3:31 p.m., this matter having been continued to 10:00 a.m., May 7, 2021, the Commission then adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA

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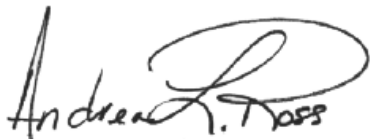

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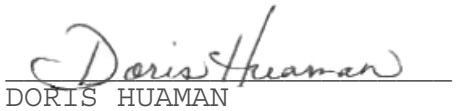

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