

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) EVIDENTIARY
Operations and Practices of Southern) HEARING
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) Investigation
from its Aliso Canyon Storage) 19-06-016
Facility. (U904G))

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May 18, 2021
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VIRTUAL PROCEEDING

MAY 18, 2021 - 10:00 A.M.

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

This is Jessica Hecht, and I am co-presiding today with ALJ Marcelo Poirier. This is, I believe, day 19 of the evidentiary hearings in Investigation 19-06-016. We are going to be dealing with one witness today, but before we get to Mr. Schwecke, we will have a discussion of some housekeeping issues.

Specifically, I have a couple of questions about things that came in yesterday. One relates to some exhibits that were served yesterday as confidential, and I believe that they were re-served this morning as not confidential, and I want to confirm whether those are the same exhibits, give or take some redacted personal information.

Mr. Gruen or Ms. Purchia?

MR. GRUEN: Yes, your Honor, I'm prepared to address that, and we also have a number of other housekeeping items we'd like -- we'd request to raise.

But, to address your Honor's questions, the confidentiality exhibits that

1 were served we have re-served with certain
2 redactions, out of an abundance of caution,
3 but we do understand from SoCalGas that the
4 exhibits that were marked confidential and
5 have been re-served as not confidential that
6 SoCalGas doesn't have any confidentiality
7 concerns; but, we'd ask that SoCalGas confirm
8 that for the record, that our understanding
9 is accurate. So that's to -- to address your
10 point.

11 And I believe your Honor also noted
12 a question just about the -- the cross
13 estimates, as well, which we are prepared to
14 address, as well as -- and we ask to raise a
15 few other items.

16 ALJ HECHT: Okay. Then, I think we
17 have resolved the issue of confidential
18 exhibits, which is helpful, because we do not
19 then need to discuss whether and -- to have a
20 closed hearing. So that saves us, I hope,
21 some trouble.

22 With that, I guess we should move on
23 to the next housekeeping items.

24 Mr. Gruen, would you like to begin?

25 MR. GRUEN: Sure, your Honor. If -- if
26 I may, may we request, just to be sure that
27 we're tracking, that SoCalGas confirm for the
28 record that our understanding about the

1 confidentiality is correct?

2 MR. STODDARD: Your Honor --

3 ALJ HECHT: Yes.

4 MR. STODDARD: -- I kind of missed
5 that. That's correct.

6 MR. GRUEN: Okay.

7 ALJ HECHT: Great.

8 MR. GRUEN: Thank you. Your Honor, we
9 can address your other point.

10 The -- the cross estimates -- SED is
11 indeed requesting a two-hour and 15-minute
12 increase in our cross estimate of
13 Mr. Schwecke from what we had initially --
14 initially proposed. We have adjusted our
15 cross estimates to get documents and points
16 in the record through Mr. Schwecke based on
17 the -- the possibility that SoCalGas will not
18 produce its own witnesses in the form of
19 Boots & Coots. In short, this may be the
20 last witness that SoCalGas offers, and our
21 cross is now planned as if that will be the
22 case, but we still have questions for
23 SoCalGas witnesses, Drs. -- Dr. Haghshenas
24 and Mr. Walzel, and concerns that SoCalGas
25 anticipated that its Boots & Coots witnesses
26 would not appear long before the witnesses
27 decided not to comply with the subpoena, and
28 argue it in Texas.

1 Your Honors, Boots & Coots'
2 testimony relates to Violations 79
3 through 83. SED has withdrawn Violations 80
4 through 82, the -- the first three
5 violations, and SoCalGas has moved to strike
6 Violations 79 and 83 from SED's testimony,
7 the last two violations that are the focus of
8 Boots & Coots's testimony. So it is apparent
9 that SoCalGas' goal was to get all of the
10 violations relating to its own witnesses'
11 testimony in the form of Boots & Coots
12 stricken from the record so that it would not
13 have to produce Boots & Coots in hearings,
14 and when SoCalGas failed to do that, it is
15 finally revealed that there's uncertainty
16 about whether it can produce these witnesses,
17 even though Boots & Coots's testimony was
18 prepared on behalf of SoCalGas on March 20th,
19 2020, more than a year ago, as shown right on
20 the cover page of that testimony.

21 In the context of all these concerns
22 and the prejudice that may be caused by them,
23 adding two hours and 15 minutes to our cross
24 estimate will not prejudice SoCalGas.
25 Indeed, we have the time allotted to do that,
26 and are noticing that now. We're providing
27 notice for that now to help address SED's due
28 process concerns that it will not get to

1 complete its cross-examination.

2 I will say, just on the housekeeping
3 estimate -- I noted your -- your Honor asked
4 about that -- the housekeeping time in this
5 case that -- that could well be an
6 overestimate. It's possible, indeed, that
7 likely we will not need to round out the day
8 on Friday with housekeeping, but we -- we
9 thought we'd flag it, in case it was needed.
10 But, our -- our anticipation is likely we
11 won't go that long, that that's conservative.
12 So that's -- that's our answer to your
13 Honor's question.

14 ALJ HECHT: Okay. That's helpful. I
15 am -- I am assuming that SoCalGas would like
16 to respond to that?

17 MR. STODDARD: Thank you, your Honor.

18 I'm not entirely clear on the -- I
19 mean I'm not entirely clear on what SED's
20 argument is with SoCalGas's intent with
21 regards to the motion to strike on the
22 violations, so I'm going to put that aside
23 for the moment, other than to base -- to
24 briefly state that there is no relationship.
25 The motion to strike that we raised was based
26 on SED's own testimony. There's no
27 relationship between that and our attempts to
28 get Boots & Coots to appear. As previously

1 explained, at the time that Boots & Coots
2 provided the prepared testimony, it was our
3 understanding and expectation that they would
4 appear. In the interim, there's been a
5 change -- what we've been told is there's
6 been a change of general counsel at
7 Halliburton, and that the new general counsel
8 does not wish to have -- you know, to appear
9 voluntarily in a out-of-state regulatory
10 proceeding, which is why they moved for a
11 protective order relative to our subpoena,
12 and we are filing a response in the form of
13 basically a motion to compel in Texas today.
14 Their motion for protective order was filed
15 on Friday. We're filing our response today.
16 We have a June 1 hearing date in Texas. All
17 of that is just to say we are continuing to
18 attempt to enforce the subpoena.

19 The relationship between Boots &
20 Coots's testimony and Mr. Schwecke's
21 testimony isn't entirely clear to me in terms
22 of the cross-examination estimates from SED.
23 And I would only note that, you know, again,
24 they're -- you know, they're entitled to ask
25 Mr. Schwecke questions related to the scope
26 of his testimony, which includes the leak
27 response, and so it's not to say there's no
28 connection. But again, if they try to

1 cross-examine him about a lot of what's in
2 Boots & Coots' testimony as to their
3 firsthand knowledge, he may simply not be
4 able to respond to it. If they're planning
5 to ask him questions about his time on the
6 hill, his experience with regard to leak
7 response, or his -- you know, his testimony,
8 then I expect that he will be able to respond
9 to it.

10 ALJ HECHT: Okay. I am looking for a
11 little bit more explanation about why there
12 would be more cross for Witness Schwecke
13 based on the possibility that the Boots &
14 Coots witnesses will not appear. I think, at
15 this point, we do not know whether they will
16 appear. We only know that they will not be
17 here this week. And if somehow a motion to
18 compel, or the functional equivalent,
19 succeeds, I would expect that we would
20 schedule another day to bring them in. If it
21 doesn't, then that will raise questions about
22 the Boots & Coots testimony and due process,
23 whether anybody can be cross-examined about
24 that testimony, and if they can't, what are
25 the implications of that. But, in the
26 meantime, we don't know whether or not
27 they're going to appear, and I am not sure
28 how their non-appearance increases the time

1 needed for Witness Schwecke.

2 Can you please describe that
3 relationship?

4 MR. GRUEN: Well, your -- your Honor,
5 we -- without tipping our hand to SoCalGas as
6 part of cross-examination, I can say
7 generally that since Mr. Schwecke -- his
8 testimony provides that he is -- was the
9 incident commander. It should be apparent
10 that he was making certain decisions, and can
11 offer, from SoCalGas' perspective, certain
12 perspectives, certain testimony related to
13 leak response, and should be able to answer
14 questions about the interrelationships with
15 Boots & Coots. So to the extent that he does
16 know -- understand questions and can answer
17 questions related to the leak response that
18 he should be able to answer some questions,
19 we believe, although we'll find out -- he
20 should be able to answer some questions that
21 were directed to Boots & Coots. So this is
22 a -- this is a concern that, since we don't
23 know -- part of the relationship to Boots &
24 Coots was supposed to have a date certain
25 today, and now our concern is that we're not
26 even sure if they're going to appear at all,
27 and because we're not sure, our concern is we
28 finish with Mr. Schwecke, learn later that

1 Boots & Coots can't be produced, and we're
2 out of luck. Our -- our -- it's our burden
3 to make the case, and then we don't have
4 anyone left to cross to get points into the
5 record, is -- is our concern, that
6 Mr. Schwecke, as an incident commander, is
7 our last chance.

8 Your Honor, related to cross, I
9 might also add there's a -- there's a point
10 that SoCalGas has also served a video graphic
11 of the flow of gas on SoCalGas' system as of
12 yesterday, and SoCalGas informed SED and Cal
13 Advocates Friday afternoon that it wanted to
14 use this as part of the direct examination of
15 Mr. Schwecke. SED and Cal Advocates both
16 objected to the use of -- use demonstrative
17 exhibits, that we understand SoCalGas has
18 called them, as part of that direct
19 examination of Mr. Schwecke, because
20 Mr. Schwecke should not be providing direct
21 testimony from the witness stand. SED noted
22 that Mr. Schwecke's direct is limited to what
23 he provided in written testimony, and nothing
24 in the status conference transcript allows
25 for direct or the demonst- -- use of
26 demonstrative exhibits to supplement the
27 direct testimony. The service is
28 prejudicial. No other witness introduced

1 surprise exhibits on redirect, much less let
2 their witnesses talk about them, or in this
3 case, on direct.

4 This case started in June of 2019.
5 SoCalGas served three rounds of -- of written
6 testimony already, but -- and I mention this
7 relating to the cross time now, if that is
8 going to be allowed. We don't know what he's
9 going to say, and it may affect our cross
10 time, as well. We may have cross-examination
11 of Mr. Schwecke that we can't possibly know
12 about until we understand what his direct is
13 going to be.

14 ALJ HECHT: All right. So we --
15 Ms. Patel, I will get to you.

16 I want to actually move back,
17 though, because I feel like we have not yet
18 resolved the issue of the cross estimates.
19 I'm still not understanding why these
20 questions -- if they are within the scope of
21 Mr. Schwecke's testimony why these require
22 additional time compared to what you
23 estimated before, and I think fundamentally
24 that's what I want to know. If they're
25 related to Mr. Schwecke's testimony, then
26 there -- they are things you can ask. But,
27 increasing the cross estimate by more than
28 two hours just strikes me as odd. I

1 understand the point you're making about this
2 possibly being the last witness, but again,
3 I'm really not understanding why these are
4 additional for Mr. Schwecke. And maybe --
5 maybe that's dense of me, but I am not
6 getting it.

7 MR. GRUEN: I appreciate the question,
8 your Honor, and I'll do my best to answer.

9 Your Honor, we had a lot of
10 questions planned for Boots & Coots, but
11 simply put, we don't know if they're going to
12 be here. And since we don't know if we'll be
13 able to ask questions of Boots & Coots, we've
14 moved some of the questions that were
15 directed towards Boots & Coots to
16 Mr. Schwecke, with the idea that he may be
17 able to answer them. However, there are some
18 that we -- we anticipate he simply wouldn't
19 be able to answer, because Boots & Coots is
20 unique. They're -- they -- they are the well
21 kill contractor. So we've done our best to
22 move some of the questions that were directed
23 to Boots & Coots over to Mr. Schwecke.]

24 ALJ HECHT: Okay. I know that Ms.
25 Patel wanted to respond. My suspicion is
26 that it was on another issue and that Mr.
27 Stoddard should respond first to this issue
28 specifically.

1 Mr. Stoddard?

2 MR. STODDARD: Thank you, your Honor.

3 I would -- you know, I mean, earlier
4 Mr. Gruen mentioned that Mr. Schwecke is the
5 incident commander, amongst some other
6 reasons here. They have known that for quite
7 a while. They have had his testimony for
8 quite a while. The scope of his
9 cross-examination, again, should be dependent
10 upon his testimony.

11 You know, I understand SED doesn't
12 want to tip their hand as to their
13 cross-examination, but, again, to me, and
14 based on the arguments that SED has been
15 presenting this morning in terms of the need
16 to ask questions, it again sounds like what
17 they are arguing for is further discovery on
18 the stand, as opposed to cross-examination.
19 The cross-examination of Mr. Schwecke would
20 be related to the testimony he's provided.
21 The cross-examination of Boots and Coots
22 would be related to the testimony they have
23 provided.

24 And in this instance, again, it's
25 not clear why they would shift from Boots and
26 Coots' testimony over to Mr. Schwecke, at
27 least based on what we've heard this morning.

28 ALJ HECHT: Ms. Bone and then Mr.

1 Gruen.

2 MS. BONE: I'll just say that, you
3 know, I disagree with what Mr. Stoddard has
4 stated. And the fact is that a little more
5 than two hours extension of a what is a cross
6 estimate is -- it seems really not an issue
7 to me. It seems more than appropriate, given
8 the likelihood that Boots and Coots will
9 never appear before this tribunal.

10 So Cal Advocates absolutely supports
11 SED's request to ex -- you know, and not just
12 its request, but its advice that it may go
13 over, it may not. But it's certainly
14 appropriate.

15 ALJ HECHT: And, Mr. Gruen?

16 MR. GRUEN: Thank you, your Honor. I
17 think Cal Advocates said it well. The one
18 thing I would add is, if the cross is cut
19 off, given the uncertainty that Boots and
20 Coots will ever show up, you know, whatever
21 the reason, it's SoCalGas's witnesses, if the
22 cross is cut off, we have concerns about a
23 due process violation. We're just concerned
24 that we're never going to get the chance to
25 ask our questions. And that's a fundamental
26 point. And we're raising it for the record.

27 ALJ HECHT: All right. I have two
28 comments here that may or may not help.

1 But the first is, it sounds like SED
2 and Public Advocates Office are anticipating
3 that the Boots and Coots testimony would be
4 admitted into the record if Boots and Coots
5 cannot be cross-examined.

6 Is that part of the basis of your
7 concern?

8 MR. GRUEN: Your Honor, we would like a
9 chance to evaluate that once we understand
10 from SoCalGas whether or not they are going
11 to produce. But to ask us what we would
12 anticipate before SoCalGas actually answers
13 whether it's going produce its own witnesses
14 is premature, we would argue.

15 ALJ HECHT: Fair enough. I didn't
16 expect to get an answer to that. I think
17 I'll try to but it another way.

18 If the Boots and Coots witnesses do
19 not appear, then there is an open question
20 that we all will have to address in some form
21 about whether parties stipulate to entering
22 their exhibits into the record.

23 And I wouldn't prejudge what is
24 appropriate in that instance. But with that
25 in mind, what I'm still concerned about is
26 not having an opportunity to ask questions.

27 MR. GRUEN: Absolutely, your Honor, we
28 are. There's questions that relates to Boots

1 and Coots' testimony that we have concerns
2 about.

3 And the fundamental point is,
4 whether SoCalGas thinks it's related or not,
5 they have moved to strike violations that
6 Boots and Coots' testimony goes to correctly.
7 And we wouldn't get a chance to even ask
8 questions about Boots and Coots -- of Boots
9 and Coots that relate to those violations.
10 That is a concern.

11 Meaning, SoCalGas' move to strike
12 violations related to the well kill modeling,
13 that SoCalGas did not model -- that SoCalGas
14 did not model -- do any transient
15 modeling for certain of its well kill
16 attempts. Boots and Coots' testimony says
17 they did. We're not getting information
18 about the actual documents that show the
19 models. And now we're not getting a chance
20 to even cross Boots and Coots to understand
21 the voracity of that testimony, for example.
22 That's a fundamental concern to us, your
23 Honor.

24 ALJ HECHT: All right.

25 Mr. Stoddard?

26 MR. STODDARD: Thank you, your Honor.
27 With respect to the prior motion to strike,
28 which I believe is the one -- the one Mr.

1 Gruen is referencing is the one that was
2 raised during the first week of hearings
3 orally, and which was denied without
4 prejudice by your Honors at that time.

5 And just to explain, again, in this
6 case SED, as Mr. Gruen acknowledged, bears
7 the burden. They have alleged violations for
8 SoCalGas' failure to perform well kill
9 modeling on the theory that had they done so,
10 they could have killed this on the second
11 attempt; which was based on "Well, that's
12 what their opening testimony says."

13 On cross-examination of Ms. Felts,
14 we confirmed that their theory is now that
15 the well could not have been killed by top
16 kill. Those two theories are in conflict
17 with each other. Our motion to strike isn't
18 based on testimony of Boots and Coots. Our
19 motion to strike is based on the fact that
20 they are arguing two different theories that
21 are in conflict with one another and
22 effectively arguing facts in the alternative
23 which is neither permitted, nor does it
24 really hold any logical -- nor does it (audio
25 interruption) largely based on facts in the
26 alternative. It either is or isn't.

27 That's the basis for our motion to
28 strike. It doesn't relate to Boots and

1 Coots' testimony.

2 ALJ HECHT: Yes. Just before I get to
3 Mr. Gruen, we're going to go another couple
4 minutes. I would like to hear from Mr.
5 Gruen, and then Judge Poirier and I will take
6 this under advisement. And we can discuss it
7 more probably later today.

8 Mr. Gruen.

9 MR. GRUEN: Your Honor, SoCalGas has
10 made this argument several times now that we
11 are arguing facts in the alternative. But
12 your Honors had good foresight on this that
13 the briefs will show whether, in fact, that's
14 actually the case. And, indeed, whether the
15 facts in the record support SoCalGas's
16 conclusive assertion. There's not the basis
17 in the record to show that yet. And, indeed,
18 the record is not complete.

19 And SoCalGas is saying, before we
20 even had a chance to cross-examine Boots and
21 Coots, that it has nothing to do with their
22 motion. How could they know? How could they
23 know unless we get a chance to cross-examine
24 Boots and Coots and what the record shows and
25 we have a chance to brief it fully.

26 I -- your Honor, we have a couple of
27 other points. But it's essentially that
28 SoCalGas produce it -- its own witness. And

1 we're concerned about not being able to get
2 examples, get information in the record. If
3 I may, your Honor, I -- we do have several
4 other items to raise on housekeeping that I
5 just want to flag. So it -- I don't want to
6 -- go ahead.

7 ALJ HECHT: I would like to move on and
8 take this under advisement. I am still sort
9 of perplexed. But I will discuss that with
10 Judge Poirier, and we will come back and we
11 will talk about it.

12 There were other housekeeping items.
13 And I believe that the second one you raised
14 was something that Ms. Patel wanted to
15 address if that time has not completely
16 passed or it has not fled her mind, I would
17 like the get back to her on that.

18 MS. PATEL: Your Honor, I did wish to
19 address the issue of the demonstratives. We
20 did serve two demonstratives yesterday that
21 we thought might be helpful to provide some
22 context and foundation for the
23 cross-examination. One of those
24 demonstratives was approval for its aerial
25 video of the Aliso Canyon storage facility
26 and the SS-25 well pad. We thought that
27 would be helpful because, as far as I'm
28 aware, no one participating in this

1 proceeding outside of SoCalGas has been to
2 the facility.

3 We did reach out to SED and Cal
4 Advocates on Friday to see if they'd
5 stipulate to our use of it during direct
6 testimony as demonstrative, not as exhibits.
7 And they opposed this concept. And so, at
8 this time, we are not seeking to introduce
9 them on direct. But we may use them on
10 redirected if appropriate.

11 ALJ HECHT: And, Mr. Gruen?

12 MR. GRUEN: Your Honor, we would object
13 to using them at any time for direct or
14 redirect. Whether if they introduce them on
15 redirect, it's -- it's the same as doing it
16 on direct. It's giving Mr. Schwecke an
17 opportunity to add testimony.

18 There was a clear ruling that unless
19 it is rounding out a complete exhibit,
20 completing an exhibit on redirect, it's not
21 allowed. And these are brand new exhibits,
22 your Honor. This is trying to make up new
23 rules as we go on for -- from SoCalGas. We
24 object to introducing it on direct or on
25 redirect.

26 (Crosstalk.)

27 MS. PATEL: Your Honor, we specifically
28 raised the issue of demonstratives at the

1 Status Conference before we began hearings.
2 And your Honor's procedural e-mail issued
3 before we began hearings stated that
4 demonstratives should be served along
5 with cross exhibits a day in advance by
6 1:00 p.m.

7 ALJ HECHT: Mr. Gruen?

8 MR. GRUEN: Your Honor, it's not just
9 demonstratives that we're talking about.
10 We're talking about letting Mr. Schwecke talk
11 about them. There's the -- and it's both
12 together that paint the picture that allows
13 the additional testimony. I mean, this can't
14 be looked at as a vacuum.

15 But even if it was just
16 demonstratives, they are not allowed, direct
17 or redirect. That shouldn't be -- they
18 shouldn't allowed at the last minute on the
19 last witness to change the rules that
20 everyone else understood.

21 ALJ HECHT: I will make one note. And
22 this is as I have been reminded recently,
23 there is no prohibition against getting
24 additional direct testimony from a witness on
25 the stand. That is something that happens
26 occasionally. It isn't clear to me that this
27 would necessarily be new testimony.

28 Having said that, I will allow

1 another couple of statements on this and then
2 Judge Poirier and I will take it under
3 advisement.

4 Does anybody have anything else to
5 say before we move on to whatever next
6 housekeeping issue?

7 MS. PATEL: Your Honor, I will just add
8 that, you know, it's not necessarily that
9 this is providing additional testimony. It's
10 proving context. Mr. Schwecke's opening
11 testimony discussed the well kill operation
12 that was going on at Aliso. And I think it
13 would be helpful for people to see what it
14 looks like at Aliso.

15 And it's a Google Earth video.
16 We've gotten it off the Internet. Everyone
17 has access to the same video. So I don't see
18 how this could possibly be prejudicial. And
19 we served it well in advance.

20 ALJ HECHT: And, Mr. Gruen?

21 MR. GRUEN: Your Honor, calling this
22 context instead of testimony, I'm aghast. I
23 mean, this is Mr. Schwecke testifying on the
24 record about these exhibits that were not
25 provided as any parts of testimony. That's
26 just -- that's -- I can't -- I don't know how
27 I can say it any more plainly.

28 The other concern I have is just the

1 prejudice, that none of the other witnesses
2 -- SED did not understand it could produce
3 direct testimony or allow that with its
4 witness. If it had we would -- be may well
5 have planned for this case differently. It's
6 not the ruling. We understand that direct
7 testimony can be allowed. It's just having a
8 clear understanding so that all the parties
9 can follow that at the outset. To establish
10 that as a rule now is prejudicial.

11 ALJ HECHT: Thank you. I will consider
12 that.

13 Are there any other responses for
14 this before we move on to the next item?

15 MS. PATEL: No, your Honor.

16 MR. GRUEN: No, your Honor.

17 ALJ HECHT: Thank you. Then moving on,
18 it sounded like some of the parties had more
19 housekeeping issues. I'm going to ask if
20 SoCalGas had anything they wanted to raise,
21 and then we'll go back to SED since we've
22 done two of SED's issues so far.

23 Mr. Stoddard?

24 MR. STODDARD: No, your Honor. We were
25 going to provide an update on the Boots and
26 Coots issue. But I think that's happened.

27 ALJ HECHT: Yeah. All right.

28 Then, Mr. Gruen, we are back with

1 you. But I will note that we have lost video
2 of our court reporter. So we'll be off the
3 record.

4 (Off the record.)

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

7 Mr. Gruen?

8 MR. GRUEN: Thank you, your Honor.
9 Several other housekeeping items. I believe
10 we have three.

11 The first one is regarding a motion
12 to strike that SoCalGas filed late yesterday
13 after afternoon. They filed a motion strike
14 portions of Margaret Felts' opening
15 testimony. And, your Honor, I would note
16 that as SED has been preparing for hearings
17 this week. We're not prepared to argue the
18 merits of the motion at this time. But we
19 would again request instruction that these
20 matters can be saved for final opening and
21 rely briefs after hearings. Postponing
22 arguing this until briefs is consistent with
23 your Honor's instructions on SoCalGas's other
24 motion to strike and its motion to dismiss,
25 for example.

26 As we noted with the oral motion to
27 strike that SoCalGas gas raised, there's
28 still no urgency here. And SoCalGas has

1 attempted to start the clock for us to
2 respond to this motion to strike, when it's
3 apparent that SED's attorneys are busy with
4 hearings. So we would ask that your Honors
5 find that that motion is premature, and that
6 the issue can be argued in briefs after
7 hearings.]

8 ALJ HECHT: Yes, Mr. Stoddard.

9 MR. STODDARD: Thank you, your Honor.

10 In terms of the timing of this
11 motion, first of all, under the Commission's
12 Rule 11.1(b), a motion can be brought at any
13 time in the course of the proceeding. We
14 understand that SED is preparing for
15 cross-examination; however, the time to
16 respond to this sort of motion is actually
17 15 days. It's quite long. So, there isn't a
18 substantial loss of time, when we're talking
19 about a very, very short motion. I believe
20 it was six pages when we filed it.

21 In terms of why it's appropriate to
22 address this through a motion, as opposed to
23 briefing, I believe that's explained in the
24 motion itself. We point to a precedent where
25 the same issue came up in a prior proceeding
26 with the same witness representing SED. And
27 the testimony as to the dates of a continued
28 violation were stricken because of her

1 failure to be able to speak to them and the
2 facts that were provided by counsel.

3 And in this instance, again, you
4 know, we're following kind of the precedent
5 that was established in that case in a prior
6 Commission proceeding and it was dealt with
7 in an oral motion in that instance.

8 Here we're not expecting SED to
9 respond to this orally today. We were
10 expecting that it would be responded to in
11 writing at the appropriate time consistent
12 with the Commission's rules.

13 ALJ HECHT: Any other thoughts on this?

14 MR. GRUEN: I might add, your Honor,
15 that apparently no good deed goes unpunished.
16 We asked for and received the moratorium in
17 the break between the two last rounds of
18 hearings on motions and we had an
19 understanding with SoCalGas then that motions
20 would be -- would not happen during that
21 time. And part of the reasoning for it was
22 to afford SED the same courtesy that was
23 afforded to SoCalGas when it was doing its
24 cross-examination; that is, we didn't do
25 motions then. We didn't do discovery at that
26 time and yet now when it's our turn to do
27 motions, yes it's over several rounds, but
28 now when it's our turn to do our

1 cross-examination, SoCalGas is arguing,
2 "Well, gee. It wouldn't cut down SED's time
3 too much. So let's -- let's -- that SED is
4 using its time to do hearings now."

5 Your Honor, this is something that
6 can wait. The timing of the motion, I didn't
7 frankly understand Mr. Stoddard's arguments
8 as to why this is a time-sensitive motion and
9 why it can't happen in briefs. They will
10 have their opportunity to argue why the
11 motion makes sense or why the argument makes
12 sense then.

13 ALJ HECHT: Yes, Mr. Stoddard.

14 MR. STODDARD: Thank you, your Honor.

15 The moratorium that Mr. Gruen
16 referred to was a moratorium as to motions
17 during the hiatus between the first portion
18 of evidentiary hearings and when we returned.

19 Since that time, your Honors have
20 stated, I believe, that once via e-mail and
21 twice during hearings, that written and oral
22 motions can be brought again. We are
23 bringing this written motion in accordance
24 with that direction. And in terms of the
25 timing, I think it is important because a
26 motion to strike really is something that
27 needs to be dealt with in a motion and not in
28 a briefing. For it to be argued in briefing

1 suggests that it kind of goes to the wait of
2 evidence, whereas a motion to strike, the
3 remedy is to take that testimony out all
4 together, and striking it also helps parties
5 kind of narrow and clarify the issues for
6 briefing, since it takes testimony out of the
7 evidentiary record and that's the purpose of
8 a motion to strike. It doesn't really work
9 if you do it in a brief. In a brief it would
10 be kind of arguing the weight of the
11 evidence.

12 ALJ HECHT: All right. Mr. Gruen. And
13 then I think I am going to move on.

14 MR. GRUEN: Your Honor, I'd just say if
15 I can, I'd note for the record that SoCalGas'
16 -- we already have demands on SED attorney's
17 time to prepare for the deposition of
18 Mr. Holter right after hearings. So this is
19 -- SoCalGas' motion would then add to that
20 burden. And we have talked about the
21 necessity to pour through Mr. Holter's field
22 notes and assess that for privilege. There
23 is excessive demand on that.

24 And I note that with regards, this
25 seems to be, and again we can't argue the
26 merits, but because this is talking about
27 dates, we're talking about dates for multiple
28 violations, approximately 80 of them

1 researched. It's going to take some time to
2 prepare a motion on every single date that
3 SoCalGas is talking about. The demand --
4 this is an onus burden that SoCalGas is now
5 adding to the pile it would like SED's
6 limited-staff resources to work on after
7 hearings.

8 ALJ HECHT: Judge Poirier, do you have
9 any comments before I move us along?

10 ALJ POIRIER: No. I am ready to move
11 along. Thank you.

12 ALJ HECHT: All right. Just out of
13 curiosity, I looked back on our transcript
14 from Monday of last week, the last day we
15 met, and one of the final things I said was a
16 reminder that we're no longer in the quiet
17 period on motions and that I am not
18 encouraging you to file a lot of motions, but
19 that that quiet period is, in fact, over and
20 this motion was brought in writing. I do not
21 expect to discuss the specifics of the motion
22 in the hearings.

23 We will consider your arguments and
24 get back to you about whether this should be
25 deferred to briefing, but I don't see any
26 change of the rules here. SED had the
27 opportunity to bring motions and there was no
28 rule made that we shouldn't have motions

1 during hearings, with the exception of during
2 that quiet period, during the hiatus.

3 So we will consider this. I
4 understand what you're saying and we will get
5 back to you. And with that, I think I have
6 now taken three things under advisement. And
7 we will continue with Mr. Gruen.

8 MR. GRUEN: (On mute.)

9 ALJ HECHT: And now I can't hear you.

10 MR. GRUEN: Pardon me, your Honor. Can
11 I be heard?

12 ALJ HECHT: (Affirmative nod.)

13 MR. GRUEN: Thank you, your Honor.

14 Yes, thank your, your Honor.

15 The next item we have, after the
16 cross-examination of Mr. Healy, SoCalGas
17 counsel, Ms. Patel, said on the record that
18 SoCalGas would supplement its response to SED
19 Data Request 1 and enter it into the record.
20 So SED has followed up with SoCalGas three
21 times at this point to ascertain the status
22 of these exhibits but has received no
23 response. And SED would request, at this
24 time, that SoCalGas be required to supplement
25 the response by the time hearings end this
26 week, so that we can have the exhibit that we
27 stipulated to entered into the record.

28 ALJ HECHT: (On mute.)

1 ALJ POIRIER: ALJ Hecht, I think you
2 were muted. But, Ms. Patel, why don't you go
3 ahead.

4 MS. PATEL: Yes, your Honor. It is our
5 intention to do that. I thought we had
6 responded and I apologize that we did not,
7 but it's our intent to make sure that exhibit
8 makes it way into the record.

9 ALJ HECHT: Thank you. And, Mr. Gruen,
10 it sounded like you had one final thing.

11 MR. GRUEN: Yes, your Honor. Thank
12 you. Pardon me, your Honor. No. It's been
13 addressed earlier. It was the
14 confidentiality matter. Thank you.

15 ALJ HECHT: Okay. Terrific.

16 Strange as this sounds, some of
17 these questions, I think we're on the direct
18 testimony of Mr. Schwecke, and because of
19 that, I would like to take a 10 or 15-minute
20 break.

21 I may have seen Ms. Bone raise her
22 hand or not.

23 MS. BONE: (Negative nod.)

24 ALJ HECHT: No. Okay. So I will move
25 on. I would like to take then a 15-minute
26 break. We'll see if we can address any of
27 these issues before we swear in Witness
28 Schwecke.

1 I apologize to Mr. Schwecke for
2 sitting listening to this, but this is what
3 we do.

4 Any final comments before we pause?

5 (No response.)

6 ALJ HECHT: All right. We will be back
7 at 10:50 -- no, 10:55 and we'll be off the
8 record.

9 (Off the record.)

10 (Recess.)

11 ALJ HECHT: We'll be back on the
12 record. We took a short break and I
13 conferred with Judge Poirier.

14 We can rule on a couple of those
15 housekeeping issues that we discussed this
16 morning, and some of them will stay out there
17 and not be addressed today.

18 First, there is the issue of the
19 cross-estimates. We are not at this point
20 sure whether or not Boots and Coots will
21 appear and we believe that it is premature to
22 plan as though they will not be here. So we
23 are not going to increase the cross-estimate.
24 You should do what you had intended.

25 I see the expression on your face.
26 Just because we're not in a hearing room
27 doesn't mean that it's not apparent. We are
28 not convinced that that will be an issue. If

1 it turns out that that is an issue, we can
2 revisit the need for this witness or some
3 other witness at the time that we find that
4 they will, in fact, not be appearing.

5 As I think I alluded to earlier, we
6 will also at that time have to address the
7 status of the Boots & Coots' testimony and
8 who, if anyone, is sponsoring it and whether
9 it goes in the record because I certainly
10 don't feel comfortable with it going in the
11 record now, in the absence of the witnesses.

12 So, if and when we determine they
13 will not be showing up, we can address those
14 issues. The cross-estimates we have spent a
15 lot of time and much of it inefficiently over
16 the last 18 plus days of hearings and I do
17 not want there to be any question that you do
18 not know what your limit is on
19 cross-examination. So it will stay with the
20 estimate that you had before.

21 Obviously, things can slow a little
22 bit and things can go a little shorter or a
23 little longer, but we are not approving a
24 schedule that includes an additional two plus
25 hours of cross for Mr. Schwecke.

26 The next issue is the motion that
27 was filed by SoCalGas yesterday. I think the
28 best solution for that is to extend the time

1 for SED to respond to it so that you are not
2 losing time during hearings. I think that
3 the responses to that motion would have been
4 due on June first. We're going to move that
5 out to June 7th, which is a Monday, three
6 weeks from yesterday. And that will give you
7 time that does not interfere with the
8 hearings. I do recognize there is still the
9 issue of the deposition with Mr. Holter, but
10 we all have a lot going on, and we're all
11 trying to balance it.

12 With that, I think everything else
13 we're going to leave kind of out there, and I
14 will ask if there are any other housekeeping
15 issues or questions or anything before I
16 swear in this witness.

17 (No response.)

18 ALJ HECHT: All right. Everybody is
19 silent.

20 Mr. Schwecke, are you ready to
21 begin?

22 THE WITNESS: Yes, I am, your Honor.

23 ALJ HECHT: Great. Thank you. We will
24 start by swearing you in and you will make a
25 few attestations which we have added for the
26 purpose of these hearings because they are
27 taking place virtually and we cannot see one
28 another and what each other are doing. So I

1 am going to read sort of a long list of
2 things that we would like you to agree with.
3 And then you can say whether you attest to
4 agree with those.

5 So to begin, do you solemnly affirm
6 that the testimony you are about to give will
7 be the truth, the whole truth and nothing but
8 the truth?

9 Do you swear or attest to tell the
10 truth based on your personal knowledge?

11 Do you attest that you will testify
12 based on your knowledge and memory, free from
13 external influences or pressures?

14 Do you attest that you will adhere
15 to all formal requirements of testifying
16 under oath, including the prohibition against
17 being coached?

18 Do you attest that you will not make
19 any recording of the proceedings?

20 Do you attest that you will only
21 refer to materials previously shared with all
22 parties, including exhibits premarked and
23 identified by the parties?

24 Do you attest that you understand
25 that any recording of the proceeding held by
26 Webex or teleconference, including
27 screenshots or other visual copying of a
28 hearing is absolutely prohibited?

1 And do you attest that you know that
2 violation of these prohibitions may result in
3 sanctions, including removal from the
4 evidentiary hearing, restricted entry to
5 future hearings, denial of entry to future
6 hearings or any other sanctions deemed
7 necessary by the Commission?

8 Do you agree? Do you attest to
9 those things?]

10 THE WITNESS: Yes, I do.

11 RODGER SCHWECKE, called as a witness
12 by Southern California Gas Company,
13 having been sworn or affirmed,
14 testified as follows:

15 ALJ HECHT: All right. Thank you very
16 much.

17 With that, it looks like Ms. Patel
18 will be doing your direct.

19 MS. PATEL: Thank you, your Honor.

20 DIRECT EXAMINATION

21 BY MS. PATEL:

22 Q Good morning, Mr. Schwecke. Thank
23 you for your patience.

24 A Good morning.

25 Q Could you please state and spell
26 your name for the record?

27 A Yeah. It's Rodger -- that's
28 R-o-d-g-e-r -- Schwecke, S-c-h-w-e-c-k-e.

29 Q What is your current position with

1 SoCalGas?

2 A My current position with SoCalGas
3 is senior vice president, chief
4 infrastructure officer.

5 Q How long have you been with
6 SoCalGas?

7 A I've been with the SoCalGas and
8 family of companies for what is going on
9 38 years.

10 Q Have you held any positions at
11 SoCalGas relating to underground storage?

12 A Yes, I have.

13 Q Can you please identify those?

14 A Yes. In approximately 2011, I was
15 director of underground storage. In 2016, I
16 became vice president of transmission and
17 storage, which had the underground storage
18 operations under its umbrella, and storage
19 has been under my umbrella since that date,
20 2016.

21 Q Do you have with you the exhibits
22 that have been premarked as SoCalGas-02, the
23 Prepared Opening Testimony of Rodger Schwecke
24 dated November 22nd, 2019, SoCalGas-23, the
25 Prepared Sur-Reply Testimony of Rodger
26 Schwecke dated June 30th, 2020, and
27 SoCalGas-24, which are the exhibits to the
28 Prepared Sur-Reply Testimony of Rodger

1 Schwecke, also dated June 30th, 2020?

2 A Yes, I do.

3 Q Were these documents prepared by
4 you or at your direction?

5 A Yes, they were.

6 Q And do you adopt them as your
7 testimony in this proceeding?

8 A Yes, I do.

9 Q One last question: The parties to
10 this proceeding have attested that they will
11 not audio or video record these proceedings,
12 but that does not apply to third parties.

13 So just in case there are any third
14 parties who may seek to record the
15 proceedings, I'm stating on the record that I
16 do not consent to such a recording.

17 Do you consent to being recorded by
18 anyone separate from the transcript that is
19 being prepared by the CPUC court reporter?

20 A No, I do not.

21 MS. PATEL: Your Honor, the witness is
22 available for cross-examination.

23 ALJ HECHT: All right. I want to thank
24 you for your patience, Mr. Schwecke, and we
25 will turn to Mr. Gruen for cross-examination.

26 Please proceed.

27 MR. GRUEN: Thank -- thank you, your
28 Honor. I'm making sure I'm not on mute.

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CROSS-EXAMINATION

BY MR. GRUEN:

Q And Mr. Schwecke, I'd like to echo her Honor's sentiments, and thank you for your patience, as well. We certainly appreciate that, and good morning to you.

A Good morning.

Q Mr. Schwecke, my name is Darryl Gruen, and I'm an attorney on behalf of the Safety and Enforcement Division in this proceeding, and I have a few introductory questions to follow up on the direct that Ms. Patel did. So with that, I -- I'll just start.

Are you alone?

A Yes, I am.

Q Okay. And are you able to communicate separately or privately with anyone while you communicate through the Webex connection you have to the hearings here today?

A No, I am not.

Q Okay. Do you consent to allow anyone to record or in any way transcribe your testimony in this proceeding?

A No, I do not.

Q Okay. And let me just clarify.
Except for the court reporter that

1 has been authorized by the California Public
2 Utilities Commission, do you -- do you
3 consent to the court reporters authorized by
4 the PUC to transcribe what's said here today?

5 A Yes, I do.

6 Q Okay. If I press your memory,
7 please feel free to say that you don't
8 recall. If you don't know, please let me
9 know, and I'll take that, and move on. Do
10 you understand?

11 A Yes, I do.

12 Q Okay. And when we talk about Blade
13 today -- just a couple of term -- terms, if
14 we could establish a common understanding.

15 When we talk about Blade today, can
16 we agree we're referring to Blade Energy
17 Partners?

18 A Yes, we can.

19 Q Okay. And when we talk about the
20 Aliso Canyon facility, or Aliso, can we agree
21 we are talking about SoCalGas' Aliso Canyon
22 natural gas storage facility?

23 A I can't hear. When you said,
24 "term," we're talking about the SoCalGas
25 Aliso Canyon storage facility?

26 Q Oh, sure. I'll restate.

27 When we talk about Aliso Canyon
28 facility, or Aliso, can we agree we are

1 talking about SoCalGas Aliso Canyon natural
2 gas storage facility?

3 A Yes, we can.

4 Q Thank you. And when we use the
5 term root cause analysis, or RCA, can we
6 agree that refers to Blade's root cause
7 analysis and supplemental reports issued in
8 May 2019?

9 A Yes, we can.

10 Q Okay. And use of the term -- can
11 we agree that use of the term SS-25 refers to
12 Standard Sesnon 25 well at the Aliso Canyon
13 facility?

14 A Yes, we can.

15 Q Thank you. And can we agree that
16 the term SSSV stands for subsurface safety
17 valves?

18 A Yes, we can.

19 Q Okay. Thank you. And use of the
20 term incident -- can we agree that that
21 refers to the release of gas from the SS-25
22 facility that was discovered beginning
23 October 23rd, 2015?

24 A Can I ask a question? Are you only
25 talking about the release of gas or the
26 entire incident that occurred during that
27 period of time, and all activity?

28 Q I appreciate the clarification.

1 Let's go with your -- your understanding.

2 Would that be -- the understanding
3 you've just stated, would that be adequate --
4 an adequate understanding to define the term
5 incident as we use it moving forward?

6 A Yes, it would.

7 Q Okay. And if we use the term,
8 DOGGR, or D-O-G-G-R, or CalGEM, can we
9 understand that that refers to the Division
10 of Oil & Gas and Geothermal Resources that
11 existed prior to the name change of CalGEM?

12 A Yes, we can.

13 Q Thank you. And CPUC, you
14 understand that refers to the California
15 Public Utilities Commission?

16 A Yes.

17 Q Okay. Great. Okay. Let's turn,
18 if we could -- thank you, Mr. Schwecke -- if
19 we could, to your opening testimony, Exhibit
20 SoCalGas-02. And bear with me a moment. I'm
21 just adjusting my screen so I can see it, as
22 well. And the page -- and you see here the
23 cover page, SoCalGas-02, Prepared Opening
24 Testimony of Rodger Schwecke, November 22nd,
25 2019, and if we turn to the page that is
26 identified in your testimony as page 19,
27 which should have the Bates number
28 SoCalGas-2.0021, and do you see the Bates

1 stamp there, and page 19, and if we scroll
2 back up to lines 4 and 5 of that page, you
3 state there that you are the senior vice
4 president of gas operations and construction
5 for Southern California Gas Company and San
6 Diego Gas & Electric Company.

7 Do you see that?

8 A Yes, I see that.

9 Q Okay. So you are an officer for
10 so -- Southern California Gas Company and
11 San -- San Diego Gas & Electric Company. Is
12 that right?

13 A That is correct. And I would like
14 to mention, I -- I referenced in my
15 opening -- my title has changed, but at the
16 time this was submitted, this was my title.

17 Q Understood. Thank you.

18 Are you still currently an officer
19 for Southern California Gas Company and San
20 Diego Gas & Electric Company?

21 A Yes, I am.

22 Q Okay. And your testimony here says
23 that you're responsible for seeing over all
24 gas system operations and construction
25 projects, on lines 5 and 6 there. Is that
26 correct?

27 A That is correct.

28 Q And you served as the incident

1 operations commander leading efforts
2 surrounding the Aliso Canyon SS-25 gas leak,
3 on lines 6 and 7. Correct?

4 A Yes, I see that.

5 Q Okay. So your duties included
6 overseeing the Aliso Canyon facility's
7 compliance with all directives of DOGGR and
8 CPUC, as you state on lines 7 through 9.
9 Correct?

10 A That is correct.

11 Q And other than overseeing the Aliso
12 Canyon facility's compliance with directives
13 of DOGGR and the CPUC, what exactly was your
14 role as the incident operations commander
15 leading efforts surrounding the Aliso Canyon
16 SS-25 leak?

17 A Well, my role varied over time.
18 When I reported to the facility, I was
19 working in the communications section to
20 assist in our communications group in
21 translating the technical information that
22 was coming from the operations side.

23 Sometime around November 14th, I
24 then moved to deputy operations chief,
25 reporting to Bret Lane, and from that point
26 forward worked on the specific well site
27 issues and -- in an attempt to kill the well
28 throughout that entire period of time.

1 There were other times during the
2 period that I would flex back down to the
3 incident command. As we went to a unified
4 command, there was some roles and
5 responsibilities there.

6 But, starting at around the 14th of
7 November, I was basically -- the primary
8 function was the deputy operations chief.
9 Then, after the leak, it was to support the
10 efforts of -- of Blade Energy Partners in
11 their root cause analysis, and I was on-site
12 in supporting their efforts as they did their
13 root cause analysis.

14 Q Thank you, Mr. Schwecke.
15 Understood. Thank you.

16 Just to clarify in that
17 description, did you have a role in the
18 actual operations related to the killing of
19 well SS-25?

20 A The entire operations, yes.

21 Q Okay. And did you have a role in
22 the -- I'm sorry.

23 Let me just ask you: To your
24 understanding, which personnel from SoCalGas
25 served in the role of directly overseeing
26 field operations related to the killing of
27 well SS-25?

28 A The operations chief was Bret Lane,

1 and the well kill operations reported up
2 through him as part of the incident command
3 structure that was established in responding
4 to the incident.

5 Q Okay. And if -- if you can help me
6 understand, what was your relationship to
7 Mr. Lane related to the oversight and field
8 operations and the killing of well -- well
9 SS-25?

10 A I was Mr. Lane's -- and I'll use
11 the term right-hand man in support of the
12 efforts reporting to him. So I was basically
13 second in command of that section of the
14 incident command structure.

15 Q Okay. And as incident operations
16 commander leading efforts surrounding the
17 Aliso Canyon SS-25 gas leak, what was your
18 working definition of the term operations as
19 it related to the killing of well SS-25?

20 A Oh, that is a very broad term,
21 because when you look at operations of
22 killing the well, it goes from -- all the way
23 from planning to acquiring materials to
24 acquiring contractors to mobilizing the
25 logistics and mobilizing, ensuring the -- the
26 safety of the site, ensuring that we
27 basically maintained compliance with any
28 requirements that we had from agencies such

1 as CPUC, DOGGR, OSHA, and any other parties
2 that wanted us to maintain. So from that
3 standpoint, then, also up through and the
4 actual execution of kill jobs, but then in
5 the planning and making sure the site was
6 safe and doing all the additional things that
7 we had to do throughout the entire event.

8 Q Understood. Thank you,
9 Mr. Schwecke.

10 And so is that the same definition
11 of the term operations as you use it
12 elsewhere in -- under your witness
13 qualifications of testimony?

14 A Generally, when you talk about the
15 incident, once you transition to the RCA,
16 obviously, there were no well kill
17 opportunity that were -- operations, but it
18 really is support of the efforts. When you
19 say, "operations, incident operations," it's
20 support of anything that occurs on the site,
21 on the field, with respect to the activities
22 going on.

23 Q Okay. Thank you, Mr. Schwecke.

24 Turn -- if we look down on this
25 same page from lines 10 to 11, you indicate
26 here that you served as senior vice president
27 of gas transmission and storage from October
28 of 2017 to April of 19 -- 2019. Do you see

1 where I'm looking?

2 A Yes, I do.

3 Q Okay. In that role, you were
4 responsible for overseeing transmission and
5 storage operations. Is that correct?

6 A That is correct.

7 Q Okay. And in that role, were you
8 responsible for operations related to the
9 killing of SoCalGas wells?

10 A If you're referring to killing of
11 SoCalGas wells beyond the incident, since
12 this started in 2017, that was within storage
13 operations.

14 Q Okay. So that was part of your
15 role, then, as well?

16 A It was within the organization that
17 I oversaw.

18 Q Okay. And did that role include
19 responsibilities related to the maintenance
20 of SoCalGas wells?

21 A The maintenance of SoCalGas storage
22 wells along with the transmission pipeline
23 was within the organization that I led.

24 Q Okay. So would you briefly
25 describe your role with relation to the
26 responsibilities for the operations related
27 to the killing of SoCalGas wells and
28 responsibilities related to maintenance of

1 SoCalGas wells specifically at Aliso?

2 A Well, you know, as senior vice
3 president of gas transmission and storage, we
4 also have our vice president of transmission
5 and storage, and then down through the
6 organization you have directors and managers
7 down to field engineers, based on the
8 policies and procedures we have in place to
9 kill those wells. So mine is a -- a fairly
10 high-level oversight of those activities,
11 ensuring they're following policies and
12 procedures as it flows up through the
13 commun- -- the chain of command, through
14 their managers, through their directors,
15 through the vice president and to the senior
16 vice president and myself.

17 Q Okay. And did your role here that
18 we're talk -- still on the senior vice
19 president of gas transmission and storage
20 that we see on lines 10 to 11, did this role
21 include routine -- both routine and emergency
22 killing of wells?

23 A Well, I -- I don't know what your
24 distinction is between routine and emergency.
25 We had a well kill procedure that was used to
26 kill wells that was used in either case.

27 Q Okay. Okay. It was used for both
28 cases. Fair enough. Okay.

1 What about your role as senior vice
2 president of gas transmission, storage and
3 systems operator from March of -- to October
4 of 2017? And here, I'm just moving down to
5 line 12 of your -- on the same page of
6 testimony.

7 During that time, did you
8 participate in any way in operations related
9 to the killing of SoCalGas wells?

10 A I -- I think my response to that
11 question is the same it was with regard to
12 the prior role of senior vice president of
13 gas transmission and storage. The role did
14 not change much for that period of time.

15 Q Okay. How about in your role from
16 2012 to 2016, if we scroll down to line 15 of
17 the same page, beginning there? So your role
18 from -- I'm sorry. Line -- yeah, line 16.

19 From 2012 to 2016 as vice president
20 of customer solutions, did you have duties
21 that related in any way to SoCalGas natural
22 gas storage during your tenure in that role?

23 A No, I did not.

24 Q Okay. And scrolling down to
25 line 20, where you discuss -- beginning
26 there, where you discuss -- you say from 2010
27 to 2012, as director of storage managing
28 underground storage field operations that

1 support the daily and seasonal operational
2 flexibility for the gas transmission and
3 distribution system for SoCalGas -- is that a
4 reliability-related position, then?

5 A No. The director of storage
6 manages all the underground storage field
7 operations. So from that standpoint, the
8 support that the storage fields provide is
9 for that daily and seasonal operational
10 flexibility of gas transmission distribution
11 system. Director of storage is the next
12 level down in managing the actual operations
13 of the storage fields.

14 Q Okay. Okay. And is that role
15 related to killing -- the killing of SoCalGas
16 wells?

17 A As I mentioned before, the director
18 of storage and managing underground storage
19 is, you know, the support of the individuals,
20 whether it's the managers or field engineers,
21 that execute well kill operations in
22 accordance with our standard policy and
23 procedures around well kills.

24 Q I see. So when you mention that --
25 that director of storage, you were referring
26 to the -- the same role that you're
27 describing here in -- starting at line 20,
28 then. I think I'm tracking you now. Am I --

1 am I getting that right?

2 A Yes. The director of storage is --
3 as stated in my testimony, manages the
4 underground storage field operations, which
5 include, as you mentioned, well kill
6 operations, if needed.

7 Q Okay. Let's go from -- continue --
8 continuing on down, I believe, from --
9 starting at line 22, "Prior to that position,
10 I was director of energy markets and capacity
11 products from 2007 to 2010."

12 Do you see -- do you see that?

13 A Yes, I do.

14 Q As director of that -- of energy
15 markets and capacity products, then, did that
16 experience relate to killing SoCalGas wells?

17 A No, it did not.

18 Q During that time, did you work on
19 budgets related to Aliso?

20 A No, I did not.

21 Q Okay. And prior to 2007, then, did
22 any of your roles include duties where you
23 participated in the operations of killing
24 SoCalGas natural gas storage wells?

25 A No, I did not.

26 Q Okay. Did you -- have you worked
27 on any rate cases, general rate cases?

28 A Yes, I have.

1 Q And specifically, prior to 2007?

2 A Yes, I believe so.

3 Q Okay. If you can give an estimate,
4 in -- in your career, Mr. Schwecke, how many
5 actual operations of well kills have you
6 participated in, approximately?

7 A Well, I participated in all the
8 well kills associated with SS-25. Prior to
9 that, the well kill operations were managed
10 at the local level at each of the storage
11 fields in accordance with our policies and
12 procedures.

13 Q Okay. So how many actual
14 operations of well kills prior to the SS-25
15 one have -- approximately, have you
16 participated in?

17 A Can -- can you expand on what you
18 mean, participated in?

19 Q Have a role in in any fashion.

20 A Well, as director of underground
21 storage, you -- you have a role in looking at
22 those as far as the policies and procedures.
23 So if you use that as the definition,
24 participate in, I couldn't venture how many
25 times we killed wells from the period of 2010
26 to 2012.

27 Q Okay. And let me ask it this way:
28 Did you have -- how many times did you have a

1 role where you've had comparable duties to
2 the duties that you had as incident
3 operations commander for well SS-25,
4 approximately?

5 A Well, if you were to look at it as
6 far as on-site well kill activity, I can't
7 recall any time prior to the SS-25 incident
8 where I had that on-site activity.

9 Q Okay. And as the incident
10 operations commander leading efforts
11 surrounding the Aliso Canyon SS-25 gas leak,
12 are you here, then, today to answer SED's
13 questions related to Southern California Gas
14 Company's oversight of the kill attempts of
15 well SS-25?

16 A Not knowing which questions you're
17 going to ask, I believe I can answer the
18 questions with regard to the oversight of the
19 well site activities and kill attempts at
20 SS-25.

21 Q Good -- good enough. Thank you,
22 Mr. Schwecke.

23 And let -- let me ask this, too:
24 Is it accurate to say that you're also
25 responsible for testifying on SoCalGas'
26 behalf about the oversight SoCalGas provided
27 over Boots & Coots' role for killing well
28 SS-25?

1 A Yes.

2 Q Okay. Understood. Mr. -- if I
3 could turn to a slightly different line, just
4 about Boots & Coots' role, then.

5 Mr. Schwecke, are you aware that
6 Mr. Walzel, Mr. Daniel Walzel of Boots &
7 Coots, has testified that Boots & Coots
8 performed transient kill modeling prior to
9 kill attempt number seven, but that Boots &
10 Coots does not have the transient modeling
11 records related to its SS-25 kill attempts,
12 because Mr. Walzel's laptop containing all
13 the transient modeling was stolen?

14 A I am familiar with that description
15 that you put together.

16 Q Okay. Thank you. And the only
17 evidence SoCalGas has produced that Boots &
18 Coots conducted transient modeling prior to
19 kill attempt number seven is what they say in
20 their testimony. Is that correct?

21 A Who are you referring to when you
22 say, "they say"?

23 Q Boots & Coots.

24 A Well, I believe we have testimony
25 under oath by Danny Walzel test -- testifying
26 that he did transient modeling after the --
27 what I believe is the third well kill
28 attempt.

1 Q Okay. But, SoCalGas -- and both
2 SoCalGas and Boots & Coots have not produced
3 any evidence that show -- not the words, but
4 the showing that any transient kill modeling
5 was performed prior to kill attempt number
6 seven. Is that correct?

7 A I'm not aware of any documents that
8 were produced.

9 Q And no -- and the -- the
10 modeling -- the actual models, the model
11 results, those weren't produced, either.
12 Correct?

13 A Well, I think when you look at the
14 model results, those were the kill plans that
15 were -- that were prepared and submitted. So
16 we did see the results of the modeling,
17 because what comes out of that is a kill plan
18 that has been executed upon. So when you
19 say, "results of the modeling," I think we
20 did see copies, and I believe we provided
21 copies to SED.

22 Q Okay. Were you surprised to learn
23 that Mr. Walzel's laptop files related to
24 well kill attempts and modeling were not
25 saved anywhere else, and were not given to
26 anyone else?

27 A I don't have an opinion on that.

28 MR. GRUEN: Okay. Let's open Exhibit

1 SED-215, if we can, and if we could scroll
2 down, and if we go to -- just if I could read
3 this, this is Ms. Felts' -- could you scroll
4 back up again so I can read -- the Prepared
5 Sur-Reply Testimony of Margaret Felts,
6 Supporting Attachments, Chapters 1 through 9,
7 and if we go to SED sur-reply there, the --
8 the Bates stamp -- the page with the Bates
9 stamp, excuse me, SED sur-reply 001668, and
10 there's the Bates stamp there, and if we stay
11 on that page, if we could scroll to the top
12 of that page, then, just to read into the
13 record, I'll -- I'll -- oh, that's the top.
14 There we go.

15 Q Mr. Schwecke, are you familiar with
16 this data response that is part of SoCalGas
17 data response to SED data request 57 dated
18 March 26th, 2020?

19 A Yeah, I've seen a copy of this data
20 response.

21 Q Okay. And let's go down to
22 question 11, if we can, and there, it
23 states -- the question states: Given that
24 SoCalGas must comply with the safety
25 requirements of California Public Utilities
26 Code Section 451, please answer the
27 following:

28 And "A" says, "Does SoCalGas find

1 it acceptable the assertion in Mr. Walzel's
2 testimony that Mr. Walzel's transient
3 modeling was not saved anywhere else, nor was
4 it sent anywhere else?"

5 And "B" says, "Does SoCalGas take
6 the position that it was appropriate for
7 transient modeling of the SS-25 well kill
8 attempts to not have been saved anywhere else
9 than Mr. Walzel's laptop, and not to have
10 been sent to anyone else?"

11 Do you see that?

12 A Yes, I see those questions.

13 Q Okay. And if we scroll to the
14 response on this page, in the following page,
15 as well, if we could scroll down to the next
16 page, as well, do you see that SoCalGas
17 provides objections, but not a substantive
18 answer to those questions?

19 A Well, I see where SoCalGas objects
20 to the questions.

21 Q Okay. Do you see any -- any direct
22 answer to the questions in -- in either of
23 those responses?]

24 MS. PATEL: Objection, your Honor. The
25 document speaks for itself.

26 BY MR. GRUEN:

27 Q Well, let me rephrase. I'll just
28 ask this. Let me ask directly.

1 With regards to the sentence in Mr.
2 Walzel's testimony that, quote:

3 Mr. Walzel's transient modeling
4 was not saved anywhere else, nor
5 was it sent to anyone else.

6 Let's assume for the sake of
7 discussion that Mr. Walzel's entire statement
8 is true.

9 SoCalGas does not take the position
10 that it was appropriate for Mr. Walzel's
11 alleged transient modeling to not be saved
12 anywhere else and to not be sent anywhere
13 else, does it?

14 A I don't necessarily agree with that
15 statement, if I understand you correctly.
16 Because I think you said, "not appropriate."
17 And I can't really opine on the record
18 practices and operational practices of Boots
19 and Coots, during a well kill operation, what
20 they do with their transient model. I mean,
21 you're talking about the a very fluid
22 situation that's dealing with on a day-to-day
23 basis. What comes out of the model is the
24 critical aspects with regard to the well
25 kill; and that is the kill plan.

26 Q Okay. You would agree that
27 SoCalGas contractors who are involved in
28 safety-related issues, such as the killing of

1 well SS-25, be held accountable for their
2 work, for their decisions related to that
3 work, and for the care they take related to
4 that work, would you not?

5 A I don't necessarily agree with that
6 statement. I believe that SoCalGas takes the
7 responsibility for its contractor's action.
8 And I think SED holds us accountable for our
9 contractor's actions. In addition, any
10 requirement that we have with those contracts
11 would be placed in the contractual
12 arrangement we have with them. So I don't
13 think that quite matches your statement.

14 Q Okay. So I think, Mr. Schwecke,
15 your testimony shows that you have multiple
16 experiences as a SoCalGas manager, as we
17 discussed earlier; is that correct?

18 A That is correct.

19 Q Have you signed contracts on behalf
20 of SoCalGas, hiring contractors before the
21 incident?

22 A Yes, I have.

23 Q In signing those contracts, did it
24 matter to you that a contractor would handle
25 their work safely?

26 A Absolutely. I think that's
27 foundational for SoCalGas as who we are with
28 respect to safety. Because safety is

1 paramount in any of our operations, whether
2 it's a well kill operation or construction of
3 a distribution pipeline. We hold our
4 contractors accountable. Ultimately, though,
5 the contractor -- we are accountable for the
6 contractor's actions. But they follow our
7 policies and procedures and our directions to
8 perform the work safely and at the quality
9 level that we expect.

10 Q Okay. Let's stay within the same
11 document in SED-215 and SoCalGas response to
12 SED's Data Request 57, and move to question
13 21 on the page with Bates stamp that ends in
14 -001673. I think it's a couple pages down,
15 if we could get to question 21.

16 MS. PATEL: I believe this was a
17 question that was not identified by SED in
18 advance; and so if you could just give us
19 some time to review the document and prepare,
20 that would be helpful.

21 MR. GRUEN: Under -- understood. We
22 can do that. We'll just flag it for the
23 record.

24 Q So this is Bates stamp
25 SED_surreply_001673. And do you see for the
26 record there -- I'll give you -- per the
27 request of your counsel, I'll give you a
28 moment if you want to review. We're going to

1 ask about question 21:

2 Did SoCalGas authorize the use of
3 Mr. Walzel's transient models for
4 each of the well kill attempts?

5 And take your time if you want to
6 review that, Mr. Schwecke. And let me know
7 when you're ready.

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

9 (Off the record.)

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

12 Please go ahead.

13 MR. GRUEN: Thank you.

14 Q Okay. So we read the Question 21
15 of Data Request 57. And so we just gave you
16 a moment to review the question.

17 And looking at the last three lines
18 of SoCalGas response to Question 21, it
19 states:

20 The transient modeling helped
21 inform the kill plans prepared by
22 Boots and Coots. SoCalGas
23 approved the kill plans that were
24 prepared by Boots and Coots and
25 ultimately used to implement each
26 top kill attempt.

27 Do you see that?

28 A I see that statement.

1 Q Okay. So, Mr. Schwecke, I -- the
2 data response really doesn't answer the
3 question. So I'm going to ask -- I'm going
4 to assume, for purposes of this cross, and
5 ask you to confirm that SoCalGas did not
6 explicitly authorize the use of Mr. Walzel's
7 alleged transient models for preparation for
8 well kill attempts 2 through 6.

9 Is my assumptions correct?

10 A No, your assumption is not correct.

11 Q Okay.

12 Let me ask you, did you ever see
13 Mr. Walzel's alleged transient modeling for
14 well kill attempts on well SS-25 prior to his
15 use of them?

16 A I don't really understand your
17 question when you say, "Prior to his use of
18 them." And maybe I can add, for the judges,
19 some context. Because each and every day
20 after a kill job, Danny Walzel would
21 basically perform his modeling efforts in
22 communication with Houston the Halliburton
23 office. And they would run transient models.

24 And the transient model they use is
25 why you bring in an expert like Boots and
26 Coots; because they have that capability to
27 run that transient model. When you have
28 that, and you get the output of what the

1 potential kill opportunity is and the kill
2 plan, that then is presented to SoCalGas.
3 SoCalGas will talk with Boots and Coots and
4 others within SoCalGas on that kill plan, and
5 ultimately approve the kill plan that was to
6 be executed on the day it was intended to be
7 executed.

8 Q Mr. Schwecke, I appreciate that
9 answer; but that wasn't the question. The
10 question was -- and let me shorten it. I
11 appreciate the confusion. I'll shorten it
12 for you.

13 Did you ever see Mr. Walzel's
14 alleged transient modeling for well kills on
15 SS-25?

16 A As I mentioned before, I saw the
17 output of those transient models, which is
18 the results.

19 Q But not the models themselves?

20 A Well, the model itself is a
21 computer software program. So whether you
22 see -- whether you can see that modeling
23 software, I don't necessarily know whether
24 you can actually see it. You see the outputs
25 that come from it. You go based on the
26 assumptions that were put into it, which is
27 the results of the prior kill job, and what
28 are the current circumstances. That's the

1 assumptions that are put into the model. So
2 seeing the model, it's hard for me to
3 understand your question, Mr. Gruen.

4 Q Okay. Did you see the model
5 results then prior to the execution of the
6 well kill attempts that the models were used
7 for?

8 A Yes, I did.

9 Q Okay. I would assume that SoCalGas
10 provided data to Boots and Coots related to
11 the well kill attempts.

12 Is this assumption correct?

13 A Yes. SoCalGas would provide all
14 the data that Boots and Coots needed to run
15 their transient models in preparation of kill
16 jobs.

17 Q Okay. Let me back up on the model.
18 Did you see the inputs to the model
19 -- each transient model each day?

20 A Well, I think the inputs are part
21 of the discussion that occurs on -- if you
22 take an example going from well kill 2 to 3
23 or 3 to 4, you would look at the
24 circumstances of what happened on the prior
25 kill job, which included where the well is
26 today, which assumes the -- the condition of
27 the well, the reservoir pressures, what
28 happened in the last kill job as far as

1 observations; so all that information was
2 discussed with Boots and Coots, discussed
3 with our operations team, with Mr. Lane,
4 myself, and others, as to what was going to
5 be used for the transient model.

6 Q Okay. Let's just ask, if you could
7 state -- do you recall the dates when Boots
8 and Coots attempted to top kill well SS-25?

9 A For those that I was onsite, yes.

10 Q Which dates were those that you --
11 which you were onsite?

12 A I believe there would have been a
13 well kill attempt on November 15th and
14 beyond. Those would be where I was actually
15 in the operations section. I was at the
16 Aliso Canyon facility during well kill
17 attempt on November 13th and observed some of
18 the results from a distance below the well.

19 Q Okay. Do you know which Boots and
20 Coots employee prepared modeling in
21 connection with the seventh top kill attempt
22 that was attempted on SS-25?

23 A My understanding, it was -- and,
24 jeez, I'll butcher his name. It was Arash
25 from Halliburton. I won't even attempt to
26 pronounce his last name. I'm sorry.

27 Q And I'll do my best for the record,
28 Mr. Schwecke, my efforts might not be much

1 better than yours. But I'll attempt to spell
2 his name for the record and see if you could
3 confirm it.

4 It was Dr. Arash, and his last name
5 was Haghshenas, H-a-g-h-s-h-e-n-a-s. Am I
6 spelling it correctly?

7 A I don't have it in front of me; but
8 I'll take your word for it, Mr. Gruen.

9 Q That's my best effort to spell his
10 name from memory. So, I could be mistaken;
11 but if you'll accept that spelling subject to
12 check, then we can move on.

13 ALJ HECHT: It looks like Mr. Stoddard
14 wants to interject, perhaps with the
15 spelling?

16 MR. STODDARD: Sorry, your Honor, no.
17 There's a technical issue I just want to
18 confirm.

19 Ms. Patel was getting bounced in and
20 out. So she wasn't able to be heard. I
21 don't know whether she is right now; but I
22 want to make sure -- it sounded like there
23 might have been some back and forth with the
24 Commission's IT folks.

25 ALJ HECHT: All right.

26 MS. PATEL: Can you hear me now?

27 ALJ HECHT: Yes, I can --

28 MS. PATEL: I cut out. I got dropped

1 from the audio. And then I came back and
2 then apparently was not actually admitted
3 into the conference as a speaker. And then I
4 was cut out again after I should be a
5 speaker. So I've missed a sizeable chunk.

6 ALJ HECHT: All right. I apologize. I
7 did see your mouth moving. And I did not
8 assume that you were trying get our attention
9 here. So we'll be off the record.

10 (Off the record.)

11 ALJ HECHT: We'll be back on the
12 record. While we were off the record, we
13 established, unfortunately, that Ms. Patel
14 lost audio connectivity on and off for, we're
15 estimating, something like 10 questions
16 there. What we have decide to do, with all
17 parties' approval, is to move forward with
18 the end of this line of questioning, and Ms.
19 Patel and her witness can catch up over
20 lunch. And after lunch, we can the determine
21 whether there's anything that we need to do
22 that Ms. Patel would have addressed or would
23 have needed, had she been able the
24 participate there.

25 I apologize for the technical
26 issues. And I think we should pick back up
27 now.

28 Mr. Gruen -- you are muted, Mr.

1 Gruen. Please unmute and proceed.

2 MR. GRUEN: Pardon me, your Honor.

3 Thank you. Out of an abundance of caution, I
4 appreciate that.

5 I just want to be sure that -- I may
6 have slightly lost my place with this, so if
7 I'm repeating questions, bear with me. But
8 I'll try to move on.

9 Q So, as I understood, Mr. Schwecke,
10 just to pick up, it was Dr. Arash Haghshenas,
11 subject to check, is the spelling of his last
12 name, who prepared modeling with the seventh
13 top kill attempt attempted on well SS-25.

14 Did I understand your answer
15 correctly?

16 A That's my understanding.

17 Q Okay. Thank you.

18 And when did SoCalGas become aware
19 of -- I'll do my best to pronounce his name,
20 and pardon me if I'm mispronouncing it.

21 When did SoCalGas first become
22 aware of Dr. Haghshenas allegedly doing
23 transient modeling for top kill attempt
24 number seven on well SS-25?

25 A Well, I don't know if it was
26 allegedly. I think we were in communication
27 with Boots and Coots, who was in
28 communication with Halliburton. And the

1 information in discussion with Dr. Arash --
2 Dr. K, as -- Dr. H, or whatever you want to
3 use the term --

4 Q Okay.

5 A But he was participating in the
6 transient models that were being done for
7 well kill number seven.

8 Q Okay. So -- do you know when
9 SoCalGas first became aware of Boots and
10 Coots allegedly doing that transient
11 modeling?

12 A Which transient modeling are you
13 referring to that --

14 Q Yeah.

15 A The one that -- I think it was
16 obviously sometime after the sixth well kill
17 attempt on November 25th. I can't say when
18 the specific date was.

19 Q Okay. And you don't know for
20 certain when it was; is that right?

21 A I can't -- I do not know when that
22 specific date was.

23 Q Okay. So when you say you think it
24 was after the sixth well kill attempt, you're
25 not sure if it was before the seventh as
26 well; is that right?

27 A Well, I'm absolutely sure it was
28 before the seventh. The conversations with

1 others from Halliburton that were onsite,
2 like Jim LaGrone, was in discussions -- we
3 were talking about the capabilities of this
4 individual and him participating in the
5 development of the will kill for number
6 seven.

7 Q Bear with me a moment.

8 Your Honor, can we go off the
9 record for a moment?

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

12 (Off the record.)

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

15 Please proceed, Mr. Gruen.

16 BY MR. GRUEN:

17 Q Okay. If we could turn to Question
18 2 of Data Response 57 in Exhibit SED-215.
19 And there the Bates number -- yeah. Go
20 ahead. Thank you, Ms. Purchia.

21 And if we scroll down, the Bates
22 number, just for reference, is
23 SED_surreply_001665. And if we scroll up to
24 Question 2 on the same -- the Bates
25 number page ending -001664 is the Bates
26 number. Question 2 starts there and
27 continues on to the next page.

28 And we see there it starts, "Please

1 refer to," -- it starts by quoting, if we
2 scroll up a little bit further, right before
3 it -- if we could scroll up just slightly?

4 MS. PATEL: And I'll make the same
5 request that I did previously since it was
6 not identified specifically yesterday, if you
7 would give us some time to review it.

8 ALJ HECHT: All right. We'll be off
9 the record.

10 (Off the record.)

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

13 Please proceed, Mr. Gruen.

14 MR. GRUEN: Thank you.

15 Q So if we go to Question 2, it says:

16 Please refer to the following
17 passages --

18 Starting at the beginning of the
19 question:

20 Please refer to the following
21 passages in the Chapter 4 reply
22 testimony, page 3 to answer the
23 rest of the questions in this data
24 request, except for Question 32
25 and 33.

26 The first question -- and this is
27 quoting from Chapter 4 of the reply testimony
28 now.

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Question:

Did Boots and Coots perform transient kill meddling prior to kill attempt number seven?

And if we scroll to the next page, you'll see the answer, again, from testimony:

Yes. Boots and Coots performed transient kill modeling before kill attempt number seven, after Boots and Coots attempted its second well kill attempt on November 15, 2015, and reports well kill attempt on November 18 2015, and for additional kill attempts thereafter, Boots and Coots performed transient modeling.

Question -- continuing on with testimony:

Does Boots and Coots have the transient modeling reference related to its SS-25 kill attempts?

Answer:

Only for the December 22, 2015 well kill. Danny Walzel had conducted the transient modeling for well kill prior to December

1 22, 2015, however the transient
2 modeling was done on his laptop.
3 This laptop was stolen from him,
4 along with other personal items.
5 In late December 2015, Mr. Walzel
6 reported the theft to the police.
7 Mr. Walzel's transient modeling
8 was not saved anywhere else, nor
9 was it sent to anyone else.

10 Do you see that?

11 A I see those things.

12 Q Okay. And then it says:

13 With these passages in mind,
14 please answer the following
15 questions, continuing down.

16 Response to -- after the
17 objections -- let's go to page -- to --
18 excuse me -- to Question 4, with that
19 preamble in mind. And if you want to take a
20 moment, Mr. Schwecke, to read Question 4.

21 And let me know when you're ready.

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

23 (Off the record.)

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

26 Please proceed.

27 MR. GRUEN: Thank you, your Honor.

28 So Question 4 says:

1 Did SoCalGas disclose the
2 information in these passages to
3 Blade Energy Partners, or Blade,
4 during Blade's root cause
5 analysis?

6 And after the objections,
7 SoCalGas's response to Question 4 says:

8 Regarding the details described in
9 the testimony excerpted by SED in
10 the passage above, SoCalGas first
11 became aware of this information
12 cited in the excerpted passage on
13 February 21, 2020, after Blade
14 Energy Partners had issued its
15 root cause analysis report.

16 And, Mr. Schwecke, I need to
17 clarify this data response. It's my
18 understanding that SoCalGas has answered the
19 question, Question 4, here with a "no."

20 The answer is "no" to the question;
21 is that right?

22 A I think what our response is, we
23 first became aware of the information cited
24 in -- in Question Number 2, on February 21st,
25 2020.

26 Q Okay. Fair enough.

27 Your Honor, I have another line
28 that could take maybe ten minutes or so. So

1 I -- what we could do if your Honors like is
2 do that line and then break for lunch?

3 ALJ HECHT: Are there any objections to
4 proceeding that way?

5 I do not want to continue longer if
6 Ms. Patel still feels at a disadvantage from
7 not having heard that earlier line.

8 MS. PATEL: I'm fine proceeding, your
9 Honor.

10 ALJ HECHT: All right. Then we'll do
11 that. And we'll break for lunch after this
12 line, hopefully something like 12:10, give or
13 take.

14 MR. GRUEN: Understood.

15 ALJ HECHT: Please proceed.

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

18 And, Ms. Patel, we appreciate your
19 indulgence. Thank you.

20 At this point, I would like to
21 introduced Exhibit SED-258 if we could,
22 entitled "SoCalGas response to SED Data
23 Request 143," on the title page. And if we
24 go to the page with Bates stamp SED-258.001.
25 And there that's the page with the Bates
26 number that I just read -- question -- if we
27 go to the top of that -- just the top of the
28 document there so Mr. Schwecke can see.

1 Q Mr. Schwecke, are you familiar with
2 this document as SoCalGas Response to SED
3 Data Request 143?

4 A I've seen the document.

5 Q Okay. And if we go back to
6 question -- the Bates numbers, let's turn to
7 Bates number -- your Honor, can we go off the
8 record a moment? I'm sorry.

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

10 (Off the record.)

11 ALJ HECHT: All right we'll be back on
12 the record.

13 BY MR. GRUEN:

14 Q Okay. And Question 1, were there
15 -- where it says -- Mr. Schwecke, if you're
16 there on the page we've just identified
17 SED_258001 Data Request 143, Question Set 1
18 says:

19 Please refer to the Bates numbers
20 AC_CPUC_DR_16_0043472 to _0043473.

21 And Question A says:

22 Confirm these Bates numbers are on
23 a letter from SoCalGas outside
24 counsel Latham and Watkins to
25 Boots and Coots that sates in
26 part:

27 As you know, Boots and Coots has
28 been retained to assist the

1 Southern California Gas Company in
2 its response to the gas leak at
3 one of its gas storage wells,
4 SS-25 located at the Aliso Canyon
5 storage facility. Because -- and
6 if we continue to the next page --
7 the incident may lead to legal or
8 regulatory proceedings on behalf
9 of SoCalGas, we request that B&C,
10 take steps to preserve all
11 documents and other evidence that
12 relates to well SS-25 and to
13 SoCalGas and its consultants'
14 response to the leak.

15 Do you see that?

16 A I see that statement.]

17 Q And B&C refers to Boots & Coots,
18 would you agree?

19 A I believe so, but I can only assume
20 that.

21 Q Okay. And Questions 1 -- do you
22 see Questions 1B through 1G asking questions
23 relating to whether SoCalGas communicated
24 with its own personnel to preserve all
25 evidence that relates to Well SS-25?

26 A Yes, I do.

27 Q Okay. In response to Questions 1B
28 through 1G, if you would go to the bottom

1 there. Again, this is SED-258.002 Bates
2 number.

3 SoCalGas states it provides a group
4 -- a response to the entirety of 1B through
5 1G there, and it states:

6 SoCalGas' counsel has issued legal
7 holds on or around November 6,
8 2015 to relevant SoCalGas
9 employees regarding preservation
10 of documents and evidence relating
11 to legal and regulatory
12 proceedings arising from the SS-25
13 leak.

14 Do you see that?

15 A Yes, I do.

16 Q Mr. Schwecke, as Vice President --
17 and do you agree that that answer is in
18 answer to Questions B through G?

19 MS. PATEL: I am going object. Again,
20 this document speaks for itself.

21 MR. GRUEN: Fair enough. I will move
22 on.

23 Q Mr. Schwecke, as Vice President of
24 Gas Operations and Construction for Southern
25 California Gas Company and San Diego Gas &
26 Electric Company as stated in your testimony,
27 I recognize your role has changed, your title
28 has changed, but having -- your testimony

1 having provided that, and as Incident
2 Operations Commandeer leading efforts
3 surrounding the Aliso Canyon SS-25 gas leak,
4 I would assume that you were a relevant
5 SoCalGas employee, who received a legal hold
6 on or around November 6, 2015 from SoCalGas
7 counsel; is that correct?

8 A Absolutely.

9 Q Do you expect SoCalGas employees to
10 follow the instructions and the legal holds
11 that SoCalGas' counsel issued on November 6,
12 2015; is that right?

13 A Yes, we did.

14 Q In other words, you expect
15 employees to preserve documents and evidence
16 relating to legal and regulatory proceedings
17 arising from the SS-25 leak in compliance
18 with the November 6, 2015 legal hold; is that
19 right?

20 A Yes, we do.

21 Q Mr. Schwecke, SoCalGas did not
22 ensure that its contract with Boots & Coots
23 preserved evidence to support its claim that
24 it conducted transient kill modeling, prior
25 to kill attempt number seven; is that right?

26 A I cannot -- I don't understand your
27 question. I can't speculate what was
28 communicated to Boots & Coots outside my

1 purview.

2 MR. GRUEN: Understood.

3 Your Honor, at this point, we could
4 take a lunch break, if your Honors would
5 like.

6 ALJ HECHT: I think this is good timing
7 to do that.

8 Judge Poirier, do you have anything
9 else before we break?

10 ALJ POIRIER: No. I am fine with
11 breaking. Thank you.

12 ALJ HECHT: Then we're going to take
13 lunch until 1:15 and we will reassemble at
14 1:15.

15 Thank you all for your patience and
16 I'm sorry about the technical difficulties.
17 We'll be off the record.

18 (Off the record.)

19 (Whereupon, at the hour of 12:03
20 p.m., a recess was taken until 1:15
p.m.)]

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AFTERNOON SESSION - 1:15 P.M.

* * * * *

RODGER SCHWECKE,

resumed the stand and testified further as follows:

ALJ POIRIER: We'll be back on the record. We are returning from a lunch break at approximately 1:15.

While we were off the record, Ms. Patel from SoCalGas indicated that we don't need to undertake any further process, due to the lost audio earlier. And also Mr. Gruen of SED indicated that he wanted to make a clarification regarding a Bates numbering of an exhibit. So first, we'll turn to Mr. Gruen to make that clarification.

MR. GRUEN: Thank you, your Honor. Exhibit SED-258, which is SoCalGas Response to Data Request 143, I understand I had mistakenly read the Bates -- the incorrect Bates number into the record.

The Bates numbers that we had -- that are the correct markings of the pages we were referencing are AC_CPUC_SED_0043472 to 0043473.

ALJ POIRIER: Thank you, Mr. Gruen.

1 Are there any other matters for clarification
2 before we recommence with the
3 cross-examination?

4 (No response.)

5 ALJ POIRIER: Looks like there are
6 none. So, Mr. Gruen, why don't you go ahead
7 and continue.

8 MR. GRUEN: Thank you, your Honor.

9 CROSS-EXAMINATION RESUMED

10 BY MR. GRUEN:

11 Q Good afternoon, Mr. Schwecke.

12 A Good afternoon.

13 Q If we could turn to Exhibit
14 SED-310. And this -- the title page says
15 SED-310 SoCalGas Response to SED-120. And if
16 we could turn to the first page and I will go
17 to the top.

18 Mr. Schwecke, are you familiar with
19 SoCalGas Response to SED Data Request 120 and
20 that this is -- are you familiar with this
21 document as that data response?

22 A I have seen this document.

23 Q Okay. Thank you. Turning to the
24 page of this data request with Bates stamp
25 310.002, and there's the Bates stamps there.
26 And if we go to Question 1, it says:

27 Provide all recordings of
28 communications with

1 Dispatch, including radio
2 and phone recordings
3 related to the Message
4 Center Report (MCR) issued
5 on November 13, 2015, at
6 3:00 p.m., which states,
7 "During the repair process
8 to mitigate the leak at the
9 wellhead in Aliso Canyon,
10 oil was extracted and
11 vented into the
12 atmosphere."

13 Do you see that?

14 A Yes, I do.

15 Q And in response to that question,
16 after the objections, SoCalGas states:

17 SoCalGas searched through
18 recordings for the relevant
19 dispatchers for the period of
20 November 13, 2015 between 1:00 to
21 5:00 p.m. and was not able to
22 locate the recording.

23 Do you see that?

24 A Can you point to it again?

25 Q Sure.

26 A Yes. I got it. Thank you.

27 Q Okay. And I want to be sure you're
28 okay. Do you want to take a moment to read

1 it to be sure that I read it right?

2 A I believe you did.

3 Q Okay. Great. If we could turn to
4 Exhibit SED-322, and this is SoCalGas
5 Response to SED Data Request 131 shown on the
6 title, and if we could go to the first page
7 at the top.

8 Mr. Schwecke, are you familiar with
9 this document as SoCalGas Response to SED
10 Data Request 131?

11 A I've seen this.

12 Q Okay. Thank you. And if we go to
13 the -- if we go to the bottom, the Bates
14 number at the bottom just to read that into
15 the record, the bottom of this first page,
16 Bates numbers SED-322.001, and if we now go
17 to the page with Bates stamp 322.011, and
18 there is the page there, the Bates number.
19 And if we go to Question 12. Scroll down
20 slightly. Okay.

21 So, here it says at the bottom --
22 I'm sorry, Question 12D on this page, "Does
23 SoCalGas make recordings of communications
24 with Dispatch?" Do you see that?

25 A I see the question.

26 Q Okay. Turning to the next page,
27 where we see the answer, the response to
28 Question 12D, after the objection, it says,

1 "SoCalGas interprets this request to ask
2 whether SoCalGas records Dispatch
3 communications." And the answer is: "Yes."
4 Do you see that?

5 A I see that response.

6 Q Okay. And if we go back to
7 Exhibit 310 then, SED Data Response 120, and
8 on the Bates -- the page with Bates stamp
9 SED-310.003, there's the Bates stamps. And
10 if we go to Question 2 -- Question 2. Thank
11 you. It asks, "If SoCalGas possesses
12 transcripts of the recordings requested in
13 Question 1, as of the time it received this
14 data request, please provide them." Do you
15 see that?

16 A I see that question.

17 Q And in response, after the
18 objections, response to, there, it says on
19 the third line from the bottom:

20 Subject to and without waiving the
21 foregoing objection, SoCalGas
22 responds as follows: SoCalGas was
23 not able to locate a transcript.

24 Do you see that?

25 A Yes. I see that.

26 Q Okay. If you look directly above
27 Question 1, if we go to the page above it, so
28 can you scroll down to the next page. Just

1 orient myself that we're above Question 1.

2 Okay. Got you. So we go to -- okay.

3 So we look at the first part of it
4 and we say -- we see on SED-310.001 the text
5 message to which Ms. Felts refers is a
6 Message Center Report (MCR) issued on
7 November 13, 2015 at 3:00 p.m., which states,
8 quote:

9 During the repair process to
10 mitigate the leak at the wellhead
11 in Aliso Canyon, oil was extracted
12 -- turning to the next page -- oil
13 was extracted and vented into the
14 atmosphere. With these passages
15 in mind, please answer: (a)
16 Precisely how did Dispatch know to
17 state in the Message Center Report
18 that oil was extracted and vented
19 into the atmosphere?

20 Do you see that?

21 A I see that question.

22 Q And SoCalGas responded that it is
23 not currently able, quote, "not currently
24 able to pose this question to the
25 dispatcher." End quote.

26 Do you see that?

27 A I see that statement.

28 Q Why wasn't SoCalGas able to pose

1 SED's questions to the dispatcher?

2 MS. PATEL: Your Honor, I'm going
3 object. This line of questioning clearly
4 relates to the testimony of Mr. La Fevers,
5 who already appeared for cross-examination.

6 ALJ POIRIER: Mr. Gruen.

7 MR. GRUEN: Your Honor, it doesn't go
8 directly to Mr. La Fevers' testimony. I
9 might say where we're going with this; first
10 of all, Mr. La Fevers' testimony was very
11 narrowly put, relating to November 13th only,
12 but where this line is going is not
13 necessarily just to the release of mist and
14 oil into the atmosphere, but this is going to
15 SoCalGas not providing SED the recordings
16 that it said it kept. And we need to probe
17 -- as an officer of the company, we need to
18 probe Mr. Schwecke's knowledge as to why
19 SoCalGas didn't turn over recordings it said
20 it kept and turn over any other transcripts,
21 in order to enable us to pursue the records
22 that would have supported this violation.
23 That is violations of 331. That's why we're
24 asking that.

25 MS. PATEL: Your Honor, again this
26 clearly relates to the scope of
27 Mr. La Fevers' testimony.

28 And furthermore, I think that it's

1 adopting the broad scope that Mr. Gruen just
2 stated would allow Mr. Schwecke to be
3 questioned about anything at all.

4 And I will also add that if they had
5 questions about this data request response, I
6 think the appropriate thing to do would have
7 been to meet and confer or maybe even file a
8 motion to compel. I don't think now is the
9 time to ask a question about this.

10 ALJ POIRIER: I am going to overrule
11 the objection. We're going to move on. To
12 the extent we have -- I am not going to rule
13 on the broader question of other questions,
14 but as to this specific question, we're going
15 to allow the question.

16 Please continue.

17 MR. GRUEN: Thank you, your Honor.

18 Q If I may summarize these facts in
19 the form of a question then: SoCalGas issued
20 a hold of evidence related to Well SS-25 on
21 or around November 6, 2015, but SoCalGas is
22 unable to find the recordings and the
23 transcripts from November 13, 2015,
24 approximately one week after the legal hold
25 was issued, even though those recordings and
26 transcripts related to the Message Center
27 Reports stating the, quote, "oil was
28 extracted and vented into the atmosphere."

1 End quote. Is that right?

2 A That was a very long statement and
3 it was very hard to follow. So, maybe if you
4 could break it up, it might help.

5 Q Sure. SoCalGas issued a hold of
6 evidence related to Well SS-25 on or around
7 November 6, 2015. You've testified to that,
8 correct?

9 A I don't think I've testified to the
10 actual date. The November 6th was the letter
11 that went to Boots & Coots from Latham,
12 Watkins. I don't think we ever talked about
13 the date that the legal hold came out to
14 internal company employees.

15 Q Fair correction. So, November 6th
16 was the date that, as you've just testified,
17 that the hold went from Latham & Watkins to
18 Boots & Coots, and Latham & Watkins is
19 SoCalGas' outside counsel, one of them; is
20 that right?

21 A That's my understanding.

22 Q Okay. And then SoCalGas was unable
23 -- now that you've got November 6th, the
24 recordings and transcripts from
25 November 13th, when we're asking about here,
26 SoCalGas is unable to find those, correct?

27 A Well, I think you mentioned that we
28 have November 6th. November 6th was the date

1 that the letter went out to Boots & Coots. I
2 don't think we agreed upon what the date is
3 that the communication went out internally to
4 SoCalGas' employees with regard to a legal
5 hold.

6 ALJ POIRIER: Mr. Gruen, perhaps you
7 can restate.

8 MR. GRUEN: I see your question. Okay.
9 Thank you.

10 Q In light -- are you familiar with
11 the legal hold, Mr. Schwecke?

12 A Generally, I am aware that a legal
13 hold was issued. It was issued to me.

14 Q Okay. And so, the legal hold would
15 have applied -- is it your understanding
16 legal hold applied to keeping recordings and
17 transcripts related to the incident?

18 A I do not know.

19 Q What was the date of the legal
20 hold?

21 A I do not know.

22 Q Okay. Meaning you don't recall?

23 A I don't recall. I don't know.

24 Q Okay. Okay. So we've got
25 November 13, 2015 is the recordings were
26 asked about and SoCalGas couldn't find them.
27 We've established that, right?

28 A That's what the data request

1 response says.

2 Q Okay. Okay. Let's keep going.

3 Bear with me a moment.

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

5 (Off the record.)

6 ALJ POIRIER: We will be back on the
7 record.

8 BY MR. GRUEN:

9 Q Let's go back to your opening
10 testimony SoCalGas and the page with the
11 Bates stamp there -- I'm sorry. SoCalGas
12 Prepared Opening Testimony of Rodger
13 Schwecke, November 22, 2019, we see on the
14 title page. And if we go to Bates stamp
15 SoCalGas-2.0003, and that's page 1, as we see
16 the Bates stamp there.

17 Let's go up to page -- I'm sorry,
18 line 12. Excuse me. There it says:

19 Out of an abundance of caution and
20 prudence, within two days of
21 discovering the leak, SoCalGas
22 began considering and preparing a
23 contingency plan for a relief
24 well, in case the top well kill
25 was not successful.

26 Do you see that?

27 A Yes. That's my testimony.

28 Q How many times in the past has

1 SoCalGas drilled a relief well to kill a well
2 under underground storage facilities?

3 A None.

4 Q Okay. SoCalGas does not have
5 criteria in place for drilling relief wells;
6 is that correct?

7 A We do not have the expertise in
8 drilling a relief well. That's why you bring
9 in a consultant or an expert like Halliburton
10 or Boots & Coots and Sperry Drilling to do
11 that drilling.

12 Q And Bret Lane was the SoCalGas
13 personnel member, who recommended beginning a
14 relief well; is that correct?

15 A I believe so.

16 Q And SoCalGas followed Bret Lane's
17 recommendation, correct?

18 A Yes. Any time you're in the
19 incident command, you always have to look at
20 contingencies moving forward, especially
21 items that would take a significant amount of
22 time, like a relief well, and start that
23 planning process early.

24 Q And I'll just remind you,
25 Mr. Schwecke, you'll have a chance to explain
26 on redirect, but I've got a lot to get
27 through. So if you'll just indulge me when
28 these questions are "yes" or "no." A lot of

1 them are. I just ask for your -- you to
2 answer the question directly so we can get
3 through as much as we can today.

4 ALJ POIRIER: Mr. Gruen, we had a
5 question from Ms. Mandelbaum.

6 We are on the record,
7 Ms. Mandelbaum, just to make sure.

8 Please go ahead, Mr. Gruen. Sorry
9 about that.

10 MR. GRUEN: That's okay.

11 Q Okay. So, SoCalGas told Boots &
12 Coots there was a disabled SSSV, as we
13 identified earlier this morning, in the
14 tubing, before Boots & Coots planned the
15 November 13, 2015 well kill; is that correct?

16 A I don't know if I agree with your
17 statement "disabled SSSV," so if you could
18 explain what you mean by that term.

19 Q An SSSV that did not work.

20 A No. I do not agree that was an SSV
21 that did not work, because what we had
22 informed Boots & Coots about is the profile
23 of the well that included the SSV manual or
24 housing that was there. The actual SSSV
25 valve was not there. So terminology is
26 critical.

27 Q Okay. So the housing -- let me ask
28 this: Did SoCalGas tell Boots & Coots that

1 there were SSSV parts, in addition to the
2 housing in the tubing before Boots & Coots
3 planned the November 13, 2015 well kill?

4 A I don't know what you mean by parts
5 were left in the well, Mr. Gruen. The
6 housing is the section which the profile
7 would sit. So I don't know what you mean by
8 "parts."

9 Q Let's move on. SoCalGas did not
10 tell Boots & Coots that there were slots in
11 the tubing where the SSSV used to sit; is
12 that correct?

13 A I do not agree with that statement.

14 Q Okay. Has SoCalGas ever planned a
15 relief well within two days of discovering a
16 leak before the incident?

17 A I think I responded we never
18 drilled a relief well. So we probably never
19 had planned a relief well, because all of our
20 prior kill jobs or standard prior kill jobs
21 were successful.

22 Q Okay. So SoCalGas anticipated that
23 the top kills were going to fail on SS-25; is
24 that correct?

25 A That is not correct. What I said
26 is that as part of an incident management or
27 emergency response, you have to plan for
28 contingencies. So you have to plan that if

1 the steps you take do not succeed, what is
2 your next step. And especially when you take
3 a look at a relief well, which would require
4 a significant amount of time, you have to
5 start the planning as soon as you can just in
6 case the other steps don't work.

7 Q Moving to the page with Bates stamp
8 SoCalGas-2.0005, if we could go there, which
9 also identified as page 3, and the footnote
10 there -- Footnote 1 reads:

11 To the best of my knowledge and
12 based on my experience in gas
13 storage operations at SoCalGas,
14 well control efforts by top kill
15 are typically successful in
16 controlling leaking wells.
17 SoCalGas employs personnel who
18 were equipped to perform routine
19 well kills. On rare occasions,
20 however, SoCalGas must engage well
21 control specialists when it
22 encounters a well-control issue
23 that presents a unique challenge.
24 To my knowledge, SoCalGas has
25 required the assistance of a
26 well-control specialist on only
27 one prior occasion that occurred
28 in the 1970s; however, unlike the

1 SS-25 leak, that incident involved
2 a failure of surface piping near
3 the wellhead, not of a
4 below-ground leak in the
5 production casing.

6 Do you see that?

7 A Yes, I do.

8 Q SoCalGas safely performs top kills
9 on a routine basis; is that correct?

10 A That is correct.

11 Q Okay. Let's turn to page 3, Bates
12 stamp -- same number. I'm sorry, and we are
13 still on Footnote 1, so just some follow-up
14 questions on that.

15 Just at the outset, will you
16 understand if I -- when I use the term
17 "investigation," I am asking whether SoCalGas
18 investigated how and why a leak occurred?

19 A That's a very general
20 interpretation. So I prefer if you were more
21 specific rather than using a general term.

22 Q Okay. Well, I think we prefer to
23 stick with this one. Do you understand that
24 definition that I have just stated?

25 A Can you repeat it, please?

26 Q Absolutely. At the outset, will
27 you understand that when I use the term
28 "investigation," I am asking whether SoCalGas

1 investigated how and why a leak occurred?

2 A For this, we can use that term
3 "investigation" related to how and why a leak
4 occurred.

5 Q Understood. Thank you. Thank you
6 for your indulgence.

7 Did SoCalGas do its own
8 investigation of Well SS-25 related to the
9 incident?

10 A No. We did not.

11 Q Did SoCalGas hire its own
12 third-party contractor to do an investigation
13 of Well SS-25 related to the incident?

14 A No. We did not. We were not
15 allowed to by the CPUC.

16 Q Did SoCalGas draft any type of
17 document that investigated how or why Well
18 SS-25 failed?

19 A I don't know what you mean by
20 drafting a document of why SS-25 failed.

21 Q Did SoCalGas draft -- did SoCalGas
22 put any words on a piece of paper that
23 investigated -- excuse me, the SS-25
24 incident, after it happened?

25 A I don't recall any. As I
26 mentioned, the site was taken over by CPUC
27 and we were not allowed to investigate it
28 throughout the entire Blade Energy Root Cause

1 Analysis.

2 Q To your knowledge, did SoCalGas
3 consider whether it was going to do an
4 investigation on Well SS-25?

5 A Not once the CPUC told us that we
6 couldn't.

7 Q Okay. Let's go -- and just for
8 clarity, let's move on.

9 Other than -- let me ask this, a
10 new line. Other than Well SS-25, how many
11 well kills have there been of SoCalGas wells
12 over the life of Aliso Canyon, approximately,
13 if you know.

14 A I do not know.

15 Q Okay. Generally-speaking over the
16 history of Aliso, are killing wells a
17 day-to-day occurrence?

18 A I would not say they are a
19 day-to-day occurrence.

20 Q Okay. I just want to cover some of
21 the reasons that SoCalGas has historically
22 killed wells at Aliso. Some of the reasons
23 for killing wells at Aliso includes things
24 like maintenance; is that right?

25 A Well, I think one of the things, if
26 you include maintenance to identify and
27 investigate a leak that would be identified
28 through a temperature log, yes, that would be

1 maintenance.

2 Q Okay. How about stopping a leak?
3 Is that another reason SoCalGas has
4 historically killed a well at Aliso?

5 A That is our current practice. It's
6 in our procedures to kill a well, and when
7 there is a leak that has been identified, we
8 would use that practice to kill the well.

9 Q Okay. And other reasons that
10 SoCalGas has killed wells at Aliso includes
11 things like replacing equipment in the well;
12 is that right?

13 A Yeah. Maybe we can jump to any
14 time you put a workover rig on a well, you
15 need to kill the well beforehand. So if
16 you're going to do a workover, which could
17 include replacement of components of the
18 well, you'll have to kill the well.

19 Q Fair enough. Thank you,
20 Mr. Schwecke. Appreciate that.

21 Were there any fatality events
22 during a SoCalGas workover at Aliso, to your
23 knowledge?

24 A I do not know, during the time that
25 I was related to Aliso Canyon, if there was a
26 fatality associated with it. I would say
27 that there is -- clearly there's been issues
28 on workovers throughout the United States and

1 not just SoCalGas. So you can't just look at
2 SoCalGas. You have to look at the entire
3 industry.

4 Q What about with regards to injury?
5 Was anyone ever injured during a SoCalGas
6 workover at Aliso, to your knowledge?

7 A I believe there were injuries that
8 have occurred during a workover with some of
9 the work crews. It's not necessarily a
10 common, but it does happen.

11 Q Do you have an idea, when you say
12 not common, approximately how many people?

13 A No. I do not know.

14 Q Okay. Let's switch to another
15 line.

16 You mentioned Bret. We talked
17 about Bret Lane earlier. Can you tell us
18 briefly about his title and his role in the
19 Well SS-25 event? I think you touched on it
20 this morning but just if you could remind us?

21 A Bret Lane was Operations Chief
22 during the SS-25 incident.

23 Q Okay. Thank you. And Mr. Lane
24 retired during the course of this
25 investigation; is that correct?

26 A Can you define "investigation?"
27 You mean the OII? Is that what you're
28 meaning?

1 Q The OII and Order to Show Cause,
2 yes. And by OII, we mean just the common
3 understanding, Order Instituting
4 Investigation, correct?

5 A Yes. Mr. Lane retired last year.

6 Q Okay. And you understand OII to
7 mean Order Instituting Investigation, right?

8 A Yes, I do.

9 Q And OSC meaning Order to Show
10 Cause?

11 A I believe so, yes.

12 Q And do you understand this
13 proceeding includes both of those? It
14 includes an OII and an OSC, correct?

15 A Correct.

16 Q Okay. Thank you.

17 As Incident Commander related to
18 the top kill of Well SS-25; Bret Lane had
19 extensive knowledge of Well SS-25; is that
20 correct?

21 A I think I mentioned he was
22 Operations Chief. He was not Incident
23 Commander in our ICS structure. So, he had
24 and was aware of and had conversations with
25 Boots & Coots with regard to the top kill
26 opportunities.

27 Q You did say that, Mr. Schwecke.
28 Thank you for the correction and pardon me

1 for the mistake.

2 So did you communicate with Bret
3 Lane about the reason or reasons Well SS-25
4 failed on or about October 23, 2015, at any
5 point in time?]

6 A Yes. I mean we had conversation on
7 a regular basis, and really did not know,
8 until Blade Energy pulled the casing out of
9 the well, what had happened. Up until that
10 point, it was speculation on everyone's part.

11 Q Okay. Let's go to Exhibit 312, and
12 this says, on the title, "SoCalGas Response
13 to SED Data Request 16." Excuse me.

14 So on the page marked -- let's --
15 let's move to the next page, if we could,
16 just the very next one. And if we go to the
17 bottom of this page, page number SED-312.001,
18 and scroll to the top of it again, are --
19 just with the clarification, Mr. Schwecke,
20 are you familiar with this as a reproduction
21 of SoCalGas responses to SED data request 16?

22 A I do not know if it's a
23 reproduction. This looks to be a copy of our
24 response to -- if you meant by reproduction a
25 copy, yes.

26 Q And fair enough. The reason I say,
27 "reproduction" is I'm looking on line 5 where
28 it says, "SoCalGas hereby reproduces the

1 responses to SED-16." So that's the basis
2 for me using that term.

3 A Okay.

4 Q Okay. Thank you. So -- so are you
5 familiar with this, then, as a reproduction
6 of SoCalGas response to data request 15?

7 A I've seen this document.

8 Q Okay. Thank you. And if we turn
9 to the page with Bates stamp SED-312.008, and
10 there's the -- the Bates stamp at the bottom
11 there, and if we scroll up on that same page
12 to question 10, it says, "Please provide any
13 and all communications relating to Aliso
14 Canyon between SoCalGas and Boots & Coots for
15 the time period of October 1, 2015, to
16 January 31st -- January 31," excuse me,
17 "2018." Do you see that?

18 A Yes, I see that question.

19 Q And in response, response 10, the
20 response says, in part, "SoCalGas objects to
21 this request to the extent the response
22 involves attorney-client privileged
23 information and/or attorney work product."

24 Do you see that?

25 A That's what it says.

26 Q Are you aware that SoCalGas
27 continues to withhold some of its
28 communications with Boots & Coots that

1 respond to this data request from SED?

2 MS. PATEL: Your Honor, I'm going to
3 object here. This clearly relates to the
4 violations that your Honors have determined
5 are not part of the scope of the hearing.
6 This is part of the lack of cooperation
7 violations that were segregated out.

8 ALJ POIRIER: Mr. Gruen?

9 MR. GRUEN: Your Honor, while --
10 counsel's partly right. But, this is going
11 to go to the types of questions that we
12 intend to get to the bottom of, both with
13 Mr. Schwecke and Boots & Coots, if they're
14 going to provide it. What this goes to show,
15 your Honor, is that SoCalGas has been
16 stonewalling us. They have not provided
17 safe -- answers to safety-related data
18 requests. They're now -- it's uncertain
19 whether they're going to provide Boots &
20 Coots themselves. And so this goes to show
21 that we need to be able to ask a number of
22 questions of Mr. Schwecke, and that SoCalGas
23 frankly needs to produce their own witness in
24 Boots & Coots.

25 MS. PATEL: Your Honor, I do not
26 believe that that was authorized for a line
27 of questioning for Mr. Schwecke today.
28 Indeed, I believe that your Honors

1 specifically ruled that that was not the
2 purpose of questioning today, as your Honors
3 correctly noted we don't know if Boots &
4 Coots are going to appear; but, nevertheless,
5 this still goes to issues that are not within
6 the scope of Mr. Schwecke's testimony.

7 MR. GRUEN: Well, your Honor, if I may,
8 as we have stated, since we don't know,
9 including as of this date certain,
10 whether So- -- now that SoCalGas hasn't
11 produced Boots & Coots the day that it said
12 it would, we're unclear whether SoCalGas will
13 produce Boots & Coots and -- at all, and so
14 we're stuck with asking questions like this
15 of Mr. Schwecke. And frankly, your Honor --
16 go ahead. I'm --

17 ALJ POIRIER: I think, Mr. Gruen, Judge
18 Hecht, when it came back earlier -- we're not
19 going to assume at this time that Boots &
20 Coots is not going to appear. We're
21 proceeding through a legal process, and my
22 hope is that they will appear. And I think
23 she did indicate this morning that if they do
24 not appear, then we will discuss bringing
25 back Mr. Schwecke to answer these questions.
26 So I think it -- you can -- with that
27 guidance, I want you to go ahead and move
28 forward.

1 MR. GRUEN: Understood. We'll move on.
2 Thank you, your Honor.

3 MS. PATEL: Your Honor, again, this --
4 this is a live issue in the proceeding, and
5 these are -- this is not part of
6 Mr. Schwecke's testimony.

7 ALJ POIRIER: Ms. -- Ms. Patel, I ruled
8 on the objection. I -- I didn't ask for an
9 additional conversation.

10 Please go ahead, Mr. Gruen.

11 MS. PATEL: Thank you.

12 MR. GRUEN: We'll move on, your Honor.
13 Thank you for the guidance. Understood.

14 Q Okay. Okay. So just part --
15 getting back to your testimony, Mr. Schwecke,
16 that you served as incident operations
17 commander leading efforts surrounding the
18 Aliso Canyon SS-25 gas leak, do you recall
19 that?

20 A Yes, I do.

21 Q That testimony? Okay.

22 And let's turn back to your opening
23 testimony, Exhibit SoCalGas-02, on the page
24 with the Bates stamp SoCalGas-02.0020, if you
25 could go there. Thank you. And that's
26 page 18 that's also shown that way, lines 22
27 through 25, and I'll -- I'll read.

28 "Throughout the incident, based on

1 the information known to it at the time,
2 SoCalGas reasonably and prudently endeavored
3 to identify options to kill the well
4 expeditiously and ultimately killed the well
5 within a reasonable time."

6 Do you see that?

7 A Yes, that's my testimony.

8 Q Okay. I want to ask you questions
9 about the information that was known to
10 SoCalGas during the time of the incident.

11 So let's introduce Exhibit SED-318.
12 And this is an email. On the cover page, it
13 states: Email from Todd Van de Putte,
14 P-u-t-t-e, to Glenn La Fevers, L-a
15 F-e-v-e-r-s, re: --" and it says, "re" twice.
16 Pardon the typo -- ": Aliso SS-25
17 (October 23rd, 2015)." And if we could go to
18 the first page of the document and scroll to
19 the bottom, just to read the Bates number, it
20 says, "AC_CPUC_SED_DR_17_0001458," and if we
21 scroll back to the top -- I'm sorry. Let's
22 go down to the bottom again. It's the -- the
23 next email, at the bottom of this page.
24 it's -- scroll up slightly. Sorry. We're
25 almost there.

26 Okay. This is an email dated
27 October 23rd, 2015, at 8:14 p.m. from Todd
28 Van de Putte to Glenn La Fevers, Phil Baker

1 and Amy Kitson.

2 Do you see that?

3 A I see that.

4 Q Are you familiar with this email
5 thread, Mr. Schwecke?

6 A I've seen it as it was served as an
7 exhibit.

8 Q Okay. October 23rd, 2015 is the
9 day the leak at SS-25 was first discovered.
10 Correct?

11 A That is correct.

12 Q Okay. And on the second line here,
13 it says, "Once we get the wireline plug in
14 place, the reservoir should be isolated."

15 Do you see that?

16 A I see that statement.

17 Q So the same day the leak on SS-25
18 was discovered, SoCalGas planned to put a
19 plug in the tubing to stop the flow of gas.
20 Is that correct?

21 A That's what the email refers to.

22 Q Okay. Let's scroll to the top of
23 the same page and look at the email from
24 Mr. Van de Putte to Mr. La Fevers. And
25 pardon me. I'm doing my best with the
26 pronunciation. Apologies if I'm not saying
27 the names correctly.

28 But, this -- this email is dated

1 October 23rd, 2015 at 11:52 p.m. Do you see
2 that?

3 A Yes, I do.

4 Q And here, the first line begins
5 "Latest update - Had a conference call with
6 Larry," and he lists, in addition to Larry,
7 several people; however, he doesn't list your
8 name. Is that all correct?

9 A Yeah, he does not list my name.

10 Q So you were not on this con --
11 conference call that he mentioned. Is that
12 right?

13 A No, I was not.

14 Q Okay. And the second paragraph
15 begins "Current plan....keep the wireline
16 crew on standby, kill the well with the
17 polymer pill," and continues on.

18 But, do you see that passage there?

19 A I see that statement.

20 Q So this email thread shows that
21 after the conference call the plan changed
22 away from putting a plug in the tubing.
23 Correct?

24 A That's my understanding.

25 Q Do you know why it was decided not
26 to use a plug to isolate the reservoir?

27 A I can't speculate why they made
28 that decision.

1 Q Okay. Bear with me. Okay.

2 Let's go to Exhibit SED-276,
3 please, and this is -- the title of this is
4 "Core Lab report November 12, 2015" on this,
5 and if we could go to the next page, and on
6 the -- if we go to the bottom, we see
7 AC_BLD_0076009, and if we scroll just to the
8 top -- to the top of that doc -- that page,
9 it's for Southern California Gas Company
10 Standard Sesnon 25. And I'm just -- to
11 identify the document further, I'll ask you
12 if you're familiar with this in a moment.

13 But, if we could go to the next
14 page, to the Bates number there,
15 AC_BLD_0076010, and if we scroll up toward
16 the middle of the page, it's -- the company
17 is Southern California Gas Company, well
18 name, Standard Sesnon 25, field, Aliso
19 Canyon, customer name, hilly -- Hillary
20 Petrizzo -- again, pardon me for the
21 pronunciation, if I've misstated -- date of
22 survey, November 8th, 2015, date of analysis,
23 November 12, 2015.

24 Do you see all of that?

25 A I see that information.

26 Q Okay. And in the upper left corner
27 of the page, if we go to that, it says
28 prepared -- it says, "Core Lab." Correct?

1 A It does say, "Core Lab" in the
2 upper left-hand corner.

3 Q Are you familiar with this
4 document?

5 A I've seen this document.

6 Q Okay. So Core Lab prepared this
7 document for SoCalGas. Correct?

8 A Yes. We had Core Labs come on-site
9 to do -- run a log in SS-25 after it was --
10 the hyd (phonetic) rig was washed out.

11 Q Okay. Thank you. If we go to
12 page 6 of this Bates number ending -- that --
13 I'll read the whole Bates number:
14 AC_BLD_0076014. And if we scroll up on that
15 page to the observations, and we go to number
16 1, the fifth bullet there, which is the
17 last -- happens to be the last one, as well,
18 under summary -- I'm sorry. It says,
19 "Summary, gas flow appears to be flowing up
20 the tubing and exiting through a tubing
21 failure at 8435 feet" in the first and part
22 of the second line.

23 Do you see that?

24 A I see that statement.

25 Q So SoCalGas did not inform Core Lab
26 that there were slots in the tubing where the
27 SSSV used to sit. Is that correct?

28 A I cannot confirm that.

1 Q Okay. On the same page, under
2 number two, if we scroll down slightly where
3 it says, "Other secondary observations," the
4 third bullet under there, last sentence under
5 the third bullet, it says, "A subsequent
6 tubing plug ran -- run --" excuse me. Let me
7 start over.

8 "A subsequent tubing plug run set a
9 plug just above the top pup joint above the
10 SSSV. A setting depth was not reported, but
11 is estimated to be around 8380 feet. The
12 plug run confirms no gas flow inside the
13 tubing down to the plug setting depth, and,
14 of course, the plug did not shut off the gas
15 flow to surface."

16 Do you see that?

17 A I see that statement.

18 Q So from this statement, we can
19 assume that Core Lab thought there was an
20 SSSV in the tubing. Correct?

21 A No, I cannot agree with that
22 statement.

23 Q Okay. They did not say, though,
24 the remains of an SSSV or parts of an SSSV.
25 Correct?

26 A Well, what they did not say; but,
27 I -- I think they were provided the well
28 profile, because I think on the page prior

1 they really describe it, and they talk about
2 the Camco SSSV, and do not identify that
3 there was a valve in the setting. So they
4 knew it was there. Why they called it a
5 tubing fail, they looked at it from the
6 standpoint of the integrity of the tubing
7 where gas was exiting the tubing, which was
8 at the slots, which they were trying to
9 investigate. So -- and then the plug was
10 set, which confirmed their investigation
11 there was no other tubing leak besides the
12 slots that were down at the -- the lower
13 level.

14 Q And Mr. Schwecke, I -- I assure
15 you, I -- if you -- if you want to explain on
16 redirect, this -- this I understand; but, if
17 you'll indulge us to just get through the
18 "Yes" or "No" on these questions, we would
19 appreciate it. We have a lot to get through.

20 Going back to the observations on
21 the fourth bullet, it says -- and I'm reading
22 there, a -- "A cooling anomaly appears to
23 detect a leak through the surface casing at
24 about 890 feet."

25 Do you see that? Top line, fourth
26 bullet --

27 A Yes, I see that.

28 Q Is about 890 feet, then, the

1 location of the casing failure, as eventually
2 determined by SoCalGas and Blade?

3 A I think the 890 was the approximate
4 level, but this defines it as the surface
5 casing leak, and it was Blade that identified
6 that depth, and SoCalGas did not.

7 Q Appreciate the correction.
8 Understood. Thank you, Mr. Schwecke.

9 Let's look at another exhibit, if
10 we can. Go to Exhibit SED-319. This is an
11 email from Todd Van de Putte to Phil Baker
12 re: Aliso Canyon Standard Sesnon 25 wellhead
13 leak, brief summary, October 24, 2015, and if
14 we go to the first page of the document, and
15 I'll read the page number there and scroll
16 down, we see there it says,
17 "AC_CPUC_SED_DR_17_0001492." And if we
18 scroll up to the top of this page, this email
19 says that it's from Todd Van de Putte to
20 Mr. Phil Baker on October 24, 2015 at
21 6:25 p.m.

22 Do you see that?

23 A Yes, I do.

24 Q Are you familiar with this
25 document?

26 A I've seen this document when it was
27 submitted as an exhibit.

28 Q Okay. On the "cc" line, it says,

1 "Exchange Administrative Group" next to Scott
2 Furgerson's name. Do you see that?

3 A I see it says that.

4 Q Do you -- did you -- I'm sorry.

5 Did you receive emails from the
6 Exchange Administrative Group at this time?

7 A I don't know what you mean.

8 Q Well, you see the Exchange
9 Administrative Group? Do you see where I'm
10 looking next to Scott Furgerson's name?

11 A Yeah, in the parens. Correct.

12 Q Yes. Are you part of the Exchange
13 Administrative Group?

14 A I have no idea what the Exchange
15 Administrative Group is.

16 Q Understood. Okay.

17 Did you receive a copy of this
18 email?

19 A As an exhibit.

20 Q Other than as an exhibit?

21 A No.

22 Q Okay. This email was sent the day
23 after the leak in SS-25 was discovered, we
24 can agree. Right?

25 A Yes, it was.

26 Q Okay. So let's scroll down to
27 the -- the fifth paragraph, if we can, that
28 begins "Well kill activity today."

1 Do you see where we are?

2 A Yes, I do.

3 Q Okay. Here, in the second
4 sentence, Mr. Van de Putte states: The well
5 currently has an old disabled Camco
6 subsurface safety valve system in the
7 2 7/8-inch tubing string place and a gas lift
8 mandrel above it in the tubing string.

9 Did I read that correctly?

10 A Yes, you did.

11 Q Okay. Scrolling back to the top of
12 this email, do you see in the heading, if you
13 go to the top, it says, "Attachments SS-25
14 well schematic PDF"?

15 A That's what it says, there is an
16 attachment, yes.

17 Q Okay. Let's look at that
18 attachment to the email we've just covered.

19 So if we introduce Exhibit SED-320,
20 this says, "Email from Todd Van de Putte to
21 Phil Baker, October 24, 2015" at the top, and
22 if we -- on the cover page, excuse me, and if
23 we scroll down, this has a Bates stamp of --
24 on the first page, at the bottom, of
25 AC_CPUC_DR_17_0001495.

26 And I'll scroll up and give you a
27 moment to review, but I'll ask you now: Are
28 you familiar with this document?

1 A I believe I've seen the wellbore
2 schematics before in not only this exhibit,
3 but other exhibits that were presented during
4 the case.

5 Q Okay. At the bottom of this page,
6 do you see the date, June 16, 1986, right
7 above the Bates number?

8 A I see that -- those numbers listed
9 as the date.

10 Q Okay. And I think you referenced
11 this, but just to clarify for the record,
12 this is a schematic of well SS-25. Correct?

13 A That's my understanding.

14 Q Okay. So in 2015, a well schematic
15 dated 1986 represented the current condition
16 of SS-25. Is that correct?

17 A That would be my understanding.

18 Q Okay. On this schematic, at a
19 depth of 8451 feet -- let's scroll down
20 slightly, yeah -- to the right of the tubing,
21 we see, quote, Camco 2 1/2-inch SSSV.

22 Do you see that?

23 A That's what it says.

24 Q Okay. Given your familiarity with
25 the schematics of SS-25 you mentioned, are
26 you aware of any other schematic of SS-25
27 that shows anything other than that there was
28 a Camco 2 1/2-inch SSSV in the SS-25 tubing?

1 A I don't understand the question. I
2 don't know of any other schematic as you're
3 referencing.

4 Q Okay. I want to be sure you
5 understand, so let's just parse this.

6 To your knowledge, are there any
7 other schematics that do not show the Camco
8 2 1/2-inch SSSV in the SS-25 tubing like this
9 schematic shows?

10 MS. PATEL: Objection, lacks
11 foundation.

12 ALJ POIRIER: Overruled.

13 The witness can answer to the best
14 of their ability. "Yes," "No," "I don't
15 know" are all acceptable answers.

16 THE WITNESS: I -- I don't know of any
17 other schematic that does not show this same
18 information.

19 BY MR. GRUEN:

20 Q Thank you. Okay. Let's go to the
21 next line, to --

22 ALJ POIRIER: Mr. Gruen, let's go off
23 the record.

24 (Off the record.)

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

27 We're going to take a 15-minute
28 break 'til 2:25. Thank you. Off the record.

1 (Recess.)

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

4 We are just returning from an
5 afternoon break, and we will continue with
6 the cross-examination of Mr. Schwecke.

7 Please go ahead, Mr. Gruen.

8 MR. GRUEN: Thank you, your Honor.

9 Let's -- if we could return to
10 Exhibit SED-312, and bring that up on the --
11 the screen.

12 Q And Mr. Schwecke, if you'd let me
13 know when you have it.

14 Your Honor, just for a matter of
15 housekeeping, can -- can we go off the record
16 for a moment just for a request while
17 Mr. Schwecke's finding his place?

18 ALJ POIRIER: Off the record.

19 (Off the record.)

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

22 Please go ahead, Mr. Gruen.

23 MR. GRUEN: Okay.

24 Q Question -- let's go to --
25 Mr. Schwecke, just as a reminder, this -- do
26 you recall this is a reproduction of SoCalGas
27 response to SED data request 16?

28 A That's my understanding.

1 Q Okay. If we go to question 2,
2 Bates stamp 312.002 on PDF page 3, and if we
3 go to question -- it states, on question 2:
4 Of those individuals identified in response
5 to question 1, please explain their roles
6 related to the SS-25 well leak on
7 October 3rd -- 23rd, excuse me, 2015.

8 Do you see that question?

9 A I see that question.

10 Q Okay. And going to the response,
11 if we could turn specifically to the
12 reference to -- do you see your name there
13 listed in part "D"?

14 A Yes, I see my name.

15 Q Okay. And it says there, next to
16 your name, that -- pardon me.

17 With -- with -- I -- complete
18 respect, just reading the response, it says,
19 "Mr. Schwecke was not initially involved in
20 the incident response efforts, and did not
21 engage in the incident response until
22 November 11, 2015, at which point
23 Mr. Schwecke's role was in communications.
24 In this role, Mr. Schwecke dealt with --" and
25 continuing on to the next page, "dealt with
26 media and public communications, and was --
27 and was not involved in the initial decisions
28 or well kill attempts."

1 Do you see that?

2 A I see that statement.

3 Q Okay. So just for clarity, it
4 seems like there's a discrepancy between this
5 information and the description in your
6 testimony that you served as incident
7 operations commander leading efforts
8 surrounding the Aliso SS-25 leak.

9 Were you not involved in the
10 initial decisions or well kill attempts,
11 the -- the first well kill attempt, before
12 November 11, 2015?

13 A I was not on-site involved in
14 those, but when I did come on-site, I was
15 briefed on what those activities were.

16 Q Understood. Thank you. If we
17 could move on to Exhibit SED-321, and if we
18 go to the Bates stamp with
19 AC_CPUC_SED_DR_16002069, and if we scroll to
20 the -- the -- let -- let me just ask you,
21 with that, if you had a chance to review it.

22 Mr. Schwecke, are you familiar with
23 this document?

24 A I've seen this document.

25 Q Okay. Thank you. And if we go
26 to -- scroll down, please, if you would,
27 Ms. Purchia.

28 If we go to the bottom here, the --

1 scroll to the top of this email that's at the
2 bottom of this page that we're looking at,
3 and it shows here this is an email from
4 Morten Haug Emilsen; and apologies if I'm
5 mispronouncing. And I'll spell it for the
6 record: M-o-r-t-e-n H-a-u-g E-m-i-l-s-e-n.

7 So this is an email from
8 Mr. Emilsen with Add Energy to Mr. Van de
9 Putte on January 27, 2016. Is that correct?]

10 A That's what it appears.

11 Q Okay. And was Add Energy a
12 SoCalGas contractor or a Boots and Coots
13 subcontractor?

14 A I believe Add Energy was brought on
15 -- they may have been under contract through
16 Wild Well Control. But I do not know
17 specifically.

18 Q Okay. And meaning -- and the --
19 Add Energy was doing services ultimately for
20 SoCalGas; correct?

21 A That is correct. They were onsite
22 as part of the individuals we brought in in
23 support of the efforts, in particular, with
24 regard to the relief well.

25 Q Okay. Thank you.

26 And did Add Energy do simulations
27 of the top well kills and the relief well?

28 A Their focus was on the relief well.

1 But they did, in their report, try to do some
2 back casting of what happened during the
3 incidents of the top kill opportunity. They
4 were not there before the top kills were
5 performed.

6 Q I see. Okay.

7 Do you know when Add Energy was
8 brought on to do their simulations,
9 approximately?

10 A I do not know specifically.

11 Q Okay. Would you call simulations
12 "modeling"?

13 Is that another word you would use?

14 A You can call it "modeling," or you
15 can call it "simulations."

16 Q Okay. Thank you.

17 But Add Energy simulations were --
18 it would -- excuse me.

19 Let's got the second paragraph of
20 e-mail where it says -- that we have up here
21 -- where it says:

22 We have learned that on SS-25
23 there were communication between
24 -- there were communication
25 between the tubing and
26 7-inch-by-2-and-7/8-inch annulus
27 downhole through slots in the
28 tubing where the safety valve used

1 the to sit even before it was
2 perforated.

3 Do you see that?

4 A I see that statement.

5 Q Okay. So scroll up to the page
6 with the Bates stamp that ends in -20609, the
7 page right above it. And look at the e-mail
8 from Mr. Van de Putte to Mr. Emilsen dated
9 January 26th -- excuse me -- January 27, 2016
10 at 23:32 is the time stamp.

11 Do you see that?

12 A I see that e-mail -- or --

13 Q Okay.

14 A That's an e-mail.

15 Q Yes. Thank you.

16 And here Mr. Van de Putte explains
17 in the first paragraph, he says:

18 Morten, during the initial kill
19 attempt, the 2-and-7/8-inch was
20 found to be plugged, and we could
21 not pump into down the
22 2-and7/8-inch tubing and establish
23 communication between the tubing
24 and the tubing casing annulus in
25 order to kill the well. We later
26 discovered during the ongoing
27 evaluation that there was an ice
28 hydrate blockage in the

1 2-and7/8-inch tubing around the
2 depth of 450 feet, plus or minus.
3 The well was on gas injection
4 prior to the leak kill attempt,
5 and both the tubing/casing
6 pressures I --

7 And it continues on to the next
8 page:

9 -- believe were initially -- are
10 very close in pressure. With a
11 fixed injection, surface pressure
12 on the tubing and the casing,
13 there would be no way to verify if
14 and where the well was actually
15 taking gas flow into the well or
16 the reservoir as the well(s) do
17 not have metering to know the
18 individual injection rate for a
19 given well via either the tubing
20 or the casing... In other words,
21 just because the well had
22 injection pressure on the surface
23 doesn't mean the well was
24 accepting gas and could have been
25 plugged and just sitting at the
26 injection pressure with no flow.

27 Do you see that?

28 A I see that statement.

1 Q So this statement, specifically the
2 last sentence, means that SS-25 could have
3 failed sometime before October 23rd, 2015,
4 forming hydrates that stopped the flow of
5 injection gas; is that correct?

6 A I don't agree with that statement.

7 Q Okay. Let me ask you -- just
8 switch slightly.

9 When you oversaw well kill
10 operations, I assume that you were present
11 during the well kills.

12 Is that assumption correct?

13 A When I talked about overseeing well
14 sites onsite, it was -- I was present during
15 the well kills from approximately
16 November 15th on at Aliso Canyon for the
17 incident.

18 Q Okay. And November 15th is after
19 the second well kill attempt; is that right?

20 A Yes I believe so.

21 Q Okay. And the second well kill
22 attempt was done by Boots and Coots; is that
23 right?

24 A That is correct.

25 Q So I assume you provided directions
26 to Boots and Coots for the well kills where
27 you were present; is that right?

28 A Well, I think when you look at it,

1 you have to consider that it's at all the
2 people that SoCalGas and all the other
3 experts and contractors that were onsite
4 discussing the well kill plans and providing
5 input in those plans as we were to look at
6 moving forward with execution of those plans.
7 So it's not just me alone. Bret Lane who
8 ultimately, in the chain of command, was the
9 one that decided and finally approved any
10 well kill operation.

11 Q Okay. Did you have a radio that
12 allowed you to communicate with others in
13 SoCalGas during your role related to the
14 incident?

15 A Yes, I did.

16 Q Did you have a radio that allowed
17 you to communicate with Boots and Coots
18 during that time?

19 A I believe Boots and Coots had
20 radios as well that was on the same frequency
21 that we used.

22 Q Okay. Did you communicate directly
23 with Mr. Lane about well kill operations?

24 A Can you be a little more specific?
25 We had constant communications when
26 we were not in the same trailer using the
27 radio. So maybe you could clarify the
28 question.

1 Q I'm going to assume at that level
2 of generality that the answer is "yes."

3 Would that be accurate?

4 A Maybe you can repeat the
5 question --

6 Q Sure.

7 A -- and maybe I'll understand it
8 this time.

9 Q And I'll do better to try and
10 articulate it. Understood, Mr. Schwecke.
11 Pardon me.

12 Did you communicate directly with
13 Mr. Lane about operations to kill well SS-25?

14 A I communicated on the radio with
15 Mr. Lane and through direct verbal
16 communications on all operation activities
17 associated with the SS-25 leak.

18 Q Thank you. Understood. Pardon me
19 for -- I'm sure I didn't articulate it well.
20 But thank you for that answer. I appreciate
21 that.

22 What about with Mr. Van de Putte?

23 A I had communications with Mr. Van
24 de Putte. But I don't recall if he carried a
25 radio at the time I got onsite. But he was
26 onsite when we had conversations all along
27 throughout the process.

28 Q Mr. Walzel?

1 A Yes, I had communications with Mr.
2 Walzel; and he did have a radio. Typically
3 we would not communicate by radio with Boots
4 and Coots, because they wanted to focus on
5 their activities on a -- for safety reasons,
6 they would -- they didn't want to be
7 distracted.

8 Q Understood. But you communicates
9 with him in person during the well kill
10 activities; is that right?

11 A Well, I think what you have to look
12 at is the well kill activities which are
13 including the planning process, yes. Because
14 we would all meet together to talk about the
15 subsequent kill plans. I would not
16 communicate with him during the actual well
17 kill operation. Because he was onsite, as
18 far as on the well pad.

19 Boots and Coots, for safety
20 reasons, did not want anyone else onsite
21 after the November 13th where gas and liquids
22 reached the surface. So we basically
23 observed from a distance. So I couldn't have
24 any conversations with him at the specific
25 moment of the well kills.

26 Q Okay. What about Dr. Haghshenas?

27 A Well, he was not there until
28 sometime in December. So -- and during the

1 period in which he was there, yes, we did
2 have conversations; mostly, it was about the
3 relief well. Because the well kill -- the
4 seventh well kill had been completed. But
5 most of time he was there.

6 Q The communications that you had
7 with these individuals were not recorded;
8 correct?

9 A No. They were verbal
10 communications as we all sat together in a
11 trailer working through the issues.

12 Q Okay. And these communications
13 were not shared with any parties in this
14 proceeding; correct?

15 A Well, I think we're sharing them
16 right now.

17 Q Okay. Bear with me a second.

18 ALJ POIRIER: Let go off the record.

19 (Off the record.)

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

22 Please continue, Mr. Gruen.

23 BY MR. GRUEN:

24 Q Mr. Schwecke, you're aware that a
25 plug was installed into the SS-25 tubing
26 above the subsurface safety valve, or SSSV,
27 on November 12, 2015; is that correct?

28 A That is correct.

1 Q And you're aware that the tubing
2 was then perforated above that plug; is that
3 also correct?

4 A That is correct.

5 Q Before the plug was installed and
6 the tubing was perforated, did SoCalGas tell
7 Boots and Coots that the tubing had slots in
8 where the subsurface safety valve, or the
9 SSSV, sat?

10 A Yeah. Boots and Coots knew that
11 there were slots there. Because they had
12 wellbore diagrams and had conversations about
13 the path of flow of gas that we thought from
14 the tubing to the casing. So they were very
15 much aware of the original Camco SSV housing
16 and manual that sat there had that slots in
17 it.

18 Q Well, let's look at Exhibit
19 SED-275, if we could. And if we could go to
20 the Bates number at the bottom
21 AC_CPUC_0008807.

22 And if we scroll up to the toward
23 the top, Mr. Schwecke, are you familiar with
24 this document?

25 A Yeah. I've seen this document when
26 it was submitted as an exhibit for Mr.
27 Neville.

28 Q Yes, okay.

1 And do you see a reference to the
2 wire-line plug on October 5th, 2007, first
3 line in the table?

4 A Yes, I see that reference.

5 Q Okay. Was the wire-line plug there
6 installed above or below the subsurface
7 safety valve in SS-25?

8 A I do not specifically know. Mr.
9 Neville be able to -- would have been able to
10 answer that question.

11 Q Okay. Bear with me.

12 A If you like, you know, what I know
13 about it in order for the -- to perform the
14 work that was there, you would have had to
15 completely kill the well. So it had to be
16 below the SSSV housing.

17 Q Okay. Thank you.

18 Your Honor, can we go off the
19 record for a moment?

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

21 (Off the record.)

22 ALJ POIRIER: Back on the record. Go
23 ahead.

24 BY MR. GRUEN:

25 Q Okay. So the wire-line plug was
26 installed below the SSSV -- the SS-25 SSSV
27 back in October 5, 2007, but not in response
28 to SS-25 failing on October 2015; correct?

1 A This says that the wire-line plug
2 was set. And in order to perform the work,
3 you had to kill the well. So I would expect
4 it was set below the slots. And it was not
5 -- a tubing plug was not set in SS-25 as you
6 mentioned.

7 Q Okay. You provided this October 5,
8 2007 information about SS-25 to Boots and
9 Coots during the incident; correct?

10 A I do not know specifically.

11 Q Okay. Do you know if Boots and
12 Coots representatives were given access to
13 the hard copy SS-25 well file?

14 A Yes. Boots and Coots was given
15 access to the hard copy. In fact, they
16 specifically requested it as the record. The
17 hard copy is the record of the well file that
18 they wanted to use and not a copy. They had
19 received a copy before they got to
20 California --

21 Q Okay.

22 A -- but they had access to the well
23 file.

24 Q Okay. So then SoCalGas did not
25 provide a digital copy of the SS-25 well file
26 to Boots and Coots for the SS-25 well kill
27 efforts from Boots and Coots; is that
28 correct?

1 A Well, Boots and Coots was provided
2 documentation of the well file when they came
3 from Texas to California; that was
4 transmitted electronically. But when they
5 got there, they wanted to have the specific
6 hard copy of the well file. Because that is
7 the record to use, and that's the record they
8 wanted. They did not want to just rely on
9 the electronic version. They wanted the hard
10 copy, the actual physical copy.

11 Q Okay. All right. If we can go to
12 another line.

13 In your opening testimony, SoCalGas
14 to -- let's go to the page with the Bates
15 stamp 2.0019. And if we go to lines --
16 there's a Bates number that you just
17 mentioned -- thank you, Ms. Purchia.

18 And if we go to lines 6 through 7
19 -- scroll up. There --

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

21 (Off the record.)

22 ALJ POIRIER: Back on the record.

23 BY MR. GRUEN:

24 Q If we could go to the Bates number
25 at -- I misstated -- SoCalGas 2.0021, lines 6
26 through 7. And, again, just for refreshing
27 memory, here it says:

28 I served as the incident

1 operations commander leading
2 efforts surrounding the SS-25 gas
3 leak.

4 Do you see that?

5 A I see that statement.

6 BY MR. GRUEN:

7 Q Okay. So going to the Bates number
8 SoCalGas 2.0020, again -- pardon me. This is
9 for a different line. I know we read this.
10 But just for consistency in the record, lines
11 23 throughout 26, it says:

12 Throughout the incident, based on
13 the information known to it at the
14 time, SoCalGas reasonably and
15 prudently endeavored to identify
16 options to kill the well
17 expeditiously and ultimately kill
18 the well within a reasonable time.

19 Do you see that?

20 A That's my testimony.

21 Q Yes. Okay.

22 So, again, just probing the "based
23 on information known to it at the time," --
24 let's go back to the Add Energy Report,
25 Exhibit SED-281.

26 Okay. And if we go to, this time,
27 Bates stamp AC_ -- this is the Dynamic
28 Simulations Aliso SS-25 SoCalGas.

1 If we go to AC_BLD_0076289.
2 There's the Bates stamp. And if we scroll up
3 to the -- if we could zoom out slightly on
4 this.

5 Mr. Schwecke, are you familiar with
6 this image?

7 A I've seen this image.

8 Q Okay. And this image shows the
9 well SS-25, if we zoom back in slightly. And
10 if -- if we could zoom in just to where the
11 wording is on side of the well to the right.
12 Thank you. Okay.

13 And so this image shows -- if you
14 scroll down slightly, just a little bit more.
15 Okay. Great. Thank you.

16 So this image shows that well SS-25
17 has four half-inch holes called water
18 shutoffs, water shutoffs -- water shutoff
19 perforations, or WSOs, at 8,475 feet;
20 correct?

21 A That's what it says.

22 Q And below the WSO holes, at 8,486
23 feet, is the production packer; correct?

24 A That is correct.

25 Q And in the middle of this document,
26 there are arrows pointing to purple-grey
27 shading on the left of the SS-25 well with
28 the label "possible washouts behind casing."

1 Do you see that?

2 A I see that statement.

3 Q Okay. And the washouts shown on
4 this document in that shaded area bridges
5 from above the WSO perforations that are at
6 8,475 feet deep to an area below the packer
7 that includes production perforations in the
8 gas reservoir all the way down to 8,750 feet;
9 is that correct?

10 A Well, the shaded area that has been
11 identified as possible washout behind casing
12 does extend here in this diagram, as far as a
13 speculation of what could be happening.

14 Q If we go back to the second page of
15 this document with Bates number AC_DLD_007627
16 -- -70 -- excuse me -- is the Bates number.

17 Do you recall that this page, if we
18 scroll up, shows the date of February 16,
19 2016, in the upper-left corner there;
20 correct?

21 A Yeah. I believe this is the first
22 time we've looked at this document; but, yes,
23 that's the date --

24 Q Pardon me. It is the first time
25 we've looked at this part of the document,
26 yes, of the Add Energy report.

27 And the author is Morten Haug
28 Emilsen; correct?

1 A Yes. That's what is --

2 Q Okay. And the reviewer is John
3 Wright?

4 A Correct. That's what it says.

5 Q Okay. If we go to Exhibit
6 SED-219 -- so if we could just scroll down,
7 and go to the Bates number at the bottom of
8 this page --

9 A Did you say SED-219?

10 Q Yes. Yes, sir.

11 A Thank you.

12 Q Let me know when you're there --

13 A I am.

14 Q -- Mr. Schwecke.

15 Okay. Good.

16 And the Bates number,
17 AC_CPUC_SED_DR_16_0023899. And if we scroll
18 up to the top here -- so you -- just noting,
19 although you were incident operations
20 commander leading efforts surrounding the
21 Aliso Canyon SS-25 leak, your name isn't
22 included on this e-mail thread; correct?

23 A Again, I was reporting to Mr. Lane
24 at the time. So Mr. Lane was the operations
25 chief that I reported to.

26 Q Okay. But your name isn't included
27 on the e-mail thread; right?

28 A That is correct.

1 Q Okay. And, to your knowledge, none
2 of the other individuals on this e-mail
3 thread are currently -- well, except for
4 Mr. Arash Haghshenas, none of these other
5 individuals are offered as witnesses, and we
6 don't know if Dr. Haghshenas will be offered;
7 is that right?

8 A Yeah. It's my understanding they
9 are not offered as witnesses. I believe some
10 have testified in depositions or EUOs. But
11 it's not that I'm not aware of the e-mail.

12 Q Was this e-mail forwarded to you by
13 anyone during the relief well effort?

14 A No. But I think we had
15 conversations along the way -- I did not get
16 the e-mail -- but the conversations along the
17 way about speculation that there was a cavy
18 at the bottom of the well that we had to
19 account for to extend. It was there during
20 the relief well operations --

21 Q Okay.

22 A -- potential volume.

23 Q Pardon me. I almost interrupted.
24 I think I should back up and lay foundation.

25 You're familiar with this e-mail
26 then; correct?

27 A Yes, I am.

28 Q Okay. And the e-mail is dated

1 January 18, 2016, as you see there; right?

2 A That is correct.

3 Q Okay. To your knowledge, did any
4 of these individuals shown in this e-mail
5 have a role in attempts to kill well SS-25?

6 A Yes, about all of them did.

7 Q Okay. And as we see here, the
8 e-mail is from Bret Lane to John Wright;
9 correct?

10 A Yes, it is.

11 Q Just to make the connection back to
12 what we were talking about earlier.

13 John Wright was the person who
14 reviewed the February 16th, 2016, Dynamic
15 Simulations report that we were just looking
16 at; correct?

17 A That's -- he was listed at the
18 reviewer; yes.

19 Q Okay. And the e-mail copies Morten
20 Haug Emilsen; correct?

21 A That is correct.

22 Q And to tie it back to the Dynamic
23 Simulations report, Mr. Emilsen is the author
24 of the February 16, 2016, Dynamic Simulations
25 report that we were also looking at; is that
26 correct?

27 A Yeah. I will say that the previous
28 string e-mail was actually -- with the

1 attachment was from John Wright to Bret Lane.

2 Q Okay. Looking at the individuals
3 includes in this e-mail thread, the only
4 other individual besides Mr. Lane who appears
5 to have a Semprautilities.com address is
6 Hilary Petrizo; is that correct.

7 A Yes. That's what it shows.

8 Q Okay. So Hilary Petrizo had a role
9 related to well kill efforts of well SS-25?

10 A Hilary Petrizo was our geologist
11 and was involved -- basically involved in the
12 relief well operation.

13 Q Understood. Thank you.

14 And in the body of the e-mail at
15 the top, Bret Lane thanks John Wright for
16 pulling together a visual; correct?

17 A That's what he says.

18 Q Subject of the e-mail is, "SS-25
19 illustration with sands"; correct?

20 A That's the subject of the e-mail;
21 yes.

22 Q And in John Wright's email to Bret
23 Lane, he says he made the illustration. If
24 we scroll down. Scroll down slightly.

25 A Yes.

26 Q Is that correct?

27 A Yes, he does.

28 Q Okay. Turning to the next page

1 of this e-mail thread, January 18th, 2016, to
2 the page with the Bates stamp of
3 AC_CPUC_SED_16_0023900. And if we scroll up
4 on that page with that Bates number, and if
5 we could zoom out slightly.

6 Mr. Schwecke, would you agree this
7 is almost the same image as the one in the
8 Add Energy report called Dynamic Simulations
9 Aliso Canyon SS-25, dated February 16, 2016,
10 that we just viewed?]

11 A Yes, and I would expect it was
12 probably prepared by the same person.

13 Q The difference is that the possible
14 washouts behind the casing extend to an even
15 higher depth than the WSO perforations at
16 8,475 feet, correct?

17 A I'd have to look at the actual
18 document, prior document and see this --

19 Q You don't want to accept that,
20 subject to check?

21 A No. I prefer to look at the
22 documents.

23 Q Understood. I can move on to
24 another question. I can withdraw the
25 question and move on.

26 As with the February 16, 2016
27 dynamic simulations report, the washouts
28 behind the casing bridge the holes in the

1 casing above and below the packer, correct?

2 A Well, I want to say that it's a
3 possible washout. It's not necessarily a
4 washout. This is an area in contingency
5 planning for the relief well that this could
6 possibly happen, not that it was confirmed
7 that this was actually occurring.

8 Q Let's turn to the next page of this
9 exhibit Bates stamp AC_CPUC_SED_DR_17_
10 0023901. And I said it wrong. Pardon me.
11 Let me restate that. AC_CPUC_SED_DR_16_
12 0023901. And if we scroll to the top of that
13 page and zoom out, this image shows the
14 possible washouts behind the casing
15 connecting the holes in the casing above and
16 below the packer, correct?

17 A Yeah. This is same diagram as we
18 looked at before, except it showed the 10
19 percent incline in the well itself. The
20 wells aren't vertical. They're basically
21 inclined or declined depending on the spatial
22 representation. So it's the same diagram.
23 It's just a different angle of the well.

24 Q Understood. Okay. Thank you.
25 Let's go to Exhibit SED-218, and if we scroll
26 down, Bates number AC_CPUC_SED_DR_16_0023727.

27 And if we scroll up, I'll ask you,
28 Mr. Schwecke, are you familiar with this

1 e-mail?

2 A Yes, I am.

3 Q Okay. And this is an e-mail dated
4 December 27, 2015 from Jim LaGrone of Boots &
5 Coots to Hilary Petrizzo, correct?

6 A Yes. That's -- it is.

7 Q And Hilary Petrizzo was included in
8 the January 18, 2016 correspondence we just
9 reviewed from Bret Lane to John Wright that
10 showed the images with the possible washouts
11 behind the casing, correct?

12 A Yes. She was included on that
13 e-mail.

14 Q Okay. And this shows -- this
15 copies Arash Haghshenas, correct?

16 A Yes, it does.

17 Q Okay. Were you forwarded this
18 e-mail by anyone?

19 A Not that I can recall, but I know
20 we had conversations about it. It's the same
21 issue that was in the prior ones that we had
22 to account for.

23 Q Okay. The body of the e-mail says,
24 quote, "Hilary, we have a new theory on what
25 may be happening on SS-25." Do you see where
26 I'm looking?

27 A Yes, I see that.

28 Q And I assume this inadvertently,

1 the term "happening" means "happening."

2 Would you agree?

3 A I would assume so.

4 Q The second paragraph says:

5 We believe now that the perms on
6 the SS-25 may be in communication
7 above the packer through the
8 reservoir being washed out, and
9 essential having a plus or minus
10 600 bbl cavern behind the pipe.
11 Arash modeled a large casing
12 section to simulate two large
13 voids and they showed a good
14 correlation to what has taken
15 place on the last few kill jobs.

16 Do you see that?

17 A I see that as their -- as I
18 mentioned in the first statement, their new
19 theory.

20 Q And bbl stands for barrel; is that
21 right?

22 A That is correct.

23 Q And "Arash" here in the e-mail
24 refers to Arash Haghshenas, the person whose
25 name is copied on this e-mail; is that right?

26 A I believe so.

27 Q Okay. And the date of this e-mail,
28 just to be clear if we scroll up, the date of

1 this e-mail, December 27, 2015, that date is
2 after the last of the seven top kill attempts
3 on SS-25; is that correct?

4 A I believe so.

5 Q So when this e-mail says that Arash
6 modeled a large casing section to simulate
7 two large voids, in the second paragraph,
8 that modeling discussed here is dated during
9 the relief well effort to kill Well SS-25
10 then; is that right?

11 A Well, I think the modeling that he
12 is referring to is the modeling that was done
13 for the top kill opportunity and the results
14 that we got through those, and he basically
15 modeled it with a large casing section and a
16 large void to see if he could match more up
17 to what actually occurred.

18 Q Let's introduce SED-313. And if we
19 go to the Bates number there, AC_CPUC_SED_DR_
20 16_0020036 and back to the first page of --
21 back to the top here. And this one is an
22 e-mail dated February 6, 2016 from Bret Lane
23 and it copies, you; is that correct?

24 A That is correct.

25 Q Okay. And the subject line is
26 Potential -- it's a forward, but it says in
27 the subject: "Potential communication
28 between P39A and SS-25 through WSO." Is that

1 correct?

2 A That's what it says.

3 Q And P39A refers to the relief well
4 that was finally used to successfully kill
5 the target well, Well SS-25; is that correct?

6 A That is correct.

7 Q Okay. And WSO in the subject line
8 refers to water shutoff perforations,
9 correct?

10 A That would be my understanding of
11 the basis of the e-mail.

12 Q Okay. So, this would suggest that
13 Bret Lane forwarded to you and others an
14 e-mail from Morten Haug Emilsen, correct?

15 A Yes. That was the original e-mail
16 from Morten.

17 Q And Morten -- the original e-mail
18 from Morten is dated also February 6, 2016,
19 as shown just below the forwarded e-mail from
20 Bret Lane, correct?

21 A Yes. That's correct. I mean this
22 was a consideration for the relief well that
23 we had to take into account, something that
24 might happen. So that's why the rest of the
25 individuals were copied and sent a copy of
26 the e-mail.

27 Q Okay. Let's go to, if we could --

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

1 (Off the record.)

2 ALJ POIRIER: We'll be back on the
3 record. We're going to take a break until
4 3:20. Thank you. Off the record.

5 (Off the record.)

6 (Recess.)

7 ALJ POIRIER: We'll be back on the
8 record. We're returning from a short
9 afternoon break and, Mr. Gruen, please
10 continue.

11 MR. GRUEN: Thank you, Your Honor.

12 Q Okay. Mr. Schwecke, if we could go
13 to your opening testimony again, on the page
14 with Bates stamp SoCalGas-2.0014, just scroll
15 down. And if we go to the -- okay. So
16 there's the Bates number and page 12 also,
17 and you start at line 21, if we could go
18 there. And you start:

19 On November 11, 2015, in order to
20 decrease the pressure in the
21 reservoir and potentially enhance
22 the ability to conduct a
23 successful well kill attempt,
24 SoCalGas purposefully began
25 withdrawing gas from the field,
26 even before either the CPUC or
27 DOGGR directed SoCalGas to do so.

28 Do you see that?

1 A That's my testimony.

2 Q Okay. And when SoCalGas began to
3 decrease reservoir pressure on November 11,
4 2015, was the reservoir at maximum pressure
5 for the season?

6 A No.

7 Q How close was it to maximum
8 pressure, at that point?

9 A It was quite away from that. I
10 know Ms. Felts said that we were near our
11 annual peak. Well, one, we don't have an
12 annual peak. The capacity (inaudible) 86
13 bcf. On November 11th, we were probably
14 closer to 77 bcf. So we were almost 10 bcf
15 below our maximum.

16 Q Is that typical for that time of
17 year?

18 A Each year varies time-to-time,
19 depending on how much storage was used and
20 how much you can inject in a given year.

21 Q Okay. So, did SoCalGas continue
22 adding gas to the reservoir, after SS-25
23 failed?

24 A I believe it wasn't for a couple of
25 days after. I think I stated in my testimony
26 somewhere. I can't remember exactly where.

27 Q Okay. And was the reservoir
28 pressure determined to be a problem with

1 killing Well SS-25?

2 A No. It was not.

3 Q Okay. How about just making it
4 more difficult? Was there a determination
5 that the reservoir pressure made it more
6 difficult to kill the well?

7 A No. There was no indication of
8 that.

9 Q But, yet, SoCalGas did eventually
10 lower the reservoir pressure?

11 A Yeah. The one thing you achieve by
12 lowering the reservoir pressure is you will
13 reduce the amount of gas that's leaking the
14 surface, because that's all determined by the
15 pressure in the reservoir, and as the leak
16 continued, reducing the reservoir pressure
17 would reduce the amount of gas that's leaking
18 into the air.

19 Q So by reducing the amount of
20 reservoir pressure -- first, let me be sure I
21 understand that. The amount of reservoir
22 pressure has a correlation. The more you
23 reduce the reservoir pressure, the more you
24 would reduce the amount of gas that's leaked
25 into the air; is that right?

26 A Let me add some context to it. On
27 storage operations, the amount of gas that
28 can be reduced out of the reservoir is

1 directly correlated to the pressure in the
2 reservoir. As that pressure declines, the
3 amount of gas that can be produced out of any
4 of the wells declines.

5 So when you had a leak like we had
6 at SS-25, if you are able to reduce the
7 pressure, then you'd reduce the amount of gas
8 that's leaking. Very similar to a balloon
9 that's full of air, when it's fully maxed,
10 air comes out a lot faster than when it
11 slowly basically reduces in pressure.

12 Q Okay. That's helpful. Was there
13 any advantage from reducing the pressure for
14 the relief well, for the purposes of doing
15 the relief well?

16 A No. There was not.

17 Q Why not?

18 A Well, the relief well was designed
19 and the kill fluids used and the amount of
20 killing produced are used to kill the well,
21 was just dependent on what the pressure of
22 the reservoir. Also, with their relief well,
23 you didn't have to overcome the flow of gas
24 by pumping down the well. You actually
25 inject the fluid at the bottom of the well.
26 At the bottom of the well, that allows you to
27 cease it coming in from the reservoir and not
28 just substituting (inaudible). It was

1 designed for what the pressure we expected to
2 see.

3 Q Let me just ask you, isn't it a
4 concern to SoCalGas that gas was leaking into
5 the air?

6 A Yes. And that's why we were
7 attempting to kill the well as quickly and as
8 safely as possible and why we reduced the
9 reservoir pressure, to reduce the amount of
10 methane that was -- and gas that was released
11 in the air.

12 Q But why did SoCalGas wait to lower
13 the reservoir pressure?

14 A Well, you know, we basically went
15 and we thought that the well kill that
16 occurred on the 13th would kill the well. We
17 also thought the one on the 15th would kill
18 the well.

19 In addition, you couldn't start
20 reducing immediately. You had to assess the
21 situation. And we didn't know what the
22 situation was when the leak started, whether
23 there was a reservoir problem, whether there
24 was more wells affected, how far spread
25 across the field was gas migrating to
26 surface? Because in order to become on
27 withdrawals, you have to send people out in
28 the field. You've got to make sure it's safe

1 before you do that and you're not going to
2 cause other problems. That's when we
3 basically -- once we determined it was safe
4 and the well was going to have difficulty in
5 killing the well, that's when we started
6 reducing and withdrawing gas in the field.

7 Q Okay. That's helpful. Thank you.

8 So wouldn't you withdraw from the
9 well remotely, without putting people in the
10 field?

11 A No. Any time we bring a well on
12 withdrawal, there is actually people would
13 have to go to each of the wells and manually
14 open up the valves. There is no remote
15 capability to operate those valves. We
16 started by withdrawing as close to proximity
17 to SS-25 to reduce the pressure near that
18 wellbore and then we also went to the entire
19 field.

20 Q I see. Okay. Bear with me a
21 moment.

22 Let me ask you, I believe we were
23 referring to -- do you recall the, if we look
24 back at Exhibit SED-321, if we look there,
25 and if we could go back to exhibit -- I'm
26 sorry, the Bates number there ending in
27 20609. And we have here the last sentence,
28 scrolling up to the top there of that e-mail.

1 Let's go to Mr. Van de Putte's explanation.
2 Sorry. It might be on the next page. Pardon
3 me.

4 ALJ POIRIER: Let's go off the record.
5 (Off the record.)

6 ALJ POIRIER: Back on the record.
7 Please continue.

8 MR. GRUEN: Thank you, your Honor.
9 Excuse me.

10 Q So the page after the one ending in
11 0020609, do you recall reading where I read
12 at the end:

13 In other words, just because the
14 well had injection pressure on the
15 surface doesn't mean the well was
16 accepting gas and could have been
17 plugged and just sitting at the
18 injection pressure with no flow.

19 Do you see that?

20 A I see that statement.

21 Q Okay. And I think I had asked you
22 earlier that the last sentence in that SS-25
23 could have failed somewhere before October
24 23rd, 2015 forming hydrates that stopped the
25 flow of injection of gas. So you remember me
26 asking you that?

27 A Yes, I remember that.

28 Q And you said you disagreed with

1 that; is that right?

2 A That is correct.

3 Q Why do you disagree with that
4 statement?

5 A Well, I think when it was
6 identified late, people went onto the well
7 pad and basically they -- well, first of all,
8 the day before, they're doing daily
9 inspections of the well pad, visual
10 inspections. And when a well is on
11 injection, you could tell that gas is flowing
12 on that well because you can hear it flowing
13 down the well.

14 When they got to the October 23rd,
15 they thought the gas was still on injection
16 because they could hear gas flowing.

17 So the day before, when they did
18 the visual inspections, everything was
19 consistent or the days they've had
20 injections, others, you can go on-site and
21 you could tell, physically hear that a well
22 is on injection.

23 Q Okay. So that suggests that if you
24 hear that the well is on injection, it's not
25 possible to have injection and have hydrates
26 forming slightly that stopped -- that would
27 have at least impaired the flow of gas?

28 A I can't speculate on that. I would

1 also like to add, you know, that Blade Energy
2 found the same thing that the gas was flowing
3 and the well was on injection, prior to the
4 leak.

5 Q Okay. Bear with me a second.

6 Can we go off the record a moment,
7 your Honor?

8 ALJ POIRIER: Off the record.

9 (Off the record.)

10 ALJ POIRIER: Back on the record.

11 BY MR. GRUEN:

12 Q Mr. Schwecke, why did
13 Mr. Van de Putte say that here, that it might
14 not have been flowing?

15 A Well, I don't think he basically
16 makes that interpretation. What he says is
17 that you could have a situation where the
18 pressures are equal and the gas is not
19 flowing. But I don't think he makes the
20 conclusion that the gas was not injecting,
21 accepting gas at the time.

22 Q Okay. Mr. Schwecke, just do you
23 recall that I was asking you about a legal
24 hold that applied to Boots & Coots, correct?

25 A Yes, I remember that.

26 Q And do you recall a legal hold you
27 were discussing -- we were discussing a legal
28 hold that applied to SoCalGas personnel as

1 well, correct?

2 A That is correct.

3 Q Okay. So, I wanted to just, if you
4 recall, we were looking at a data request,
5 and we can go back to it if you like, the
6 exhibit number, but it was -- it was asking
7 about the recordings of communications that
8 SoCalGas made with Dispatch. Do you recall
9 that?

10 A I recall the conversation.

11 Q Okay. Do you understand -- and you
12 didn't recall the date that the legal hold
13 was provided to SoCalGas, if I understood; is
14 that right?

15 A Yeah. I do not recall the date
16 that the legal hold was issued.

17 Q Let me just probe that a little bit
18 more. Would it be your understanding -- is
19 it your understanding that SoCalGas is
20 required to preserve recordings of
21 communications with Dispatch once the
22 incident started?

23 A I do not know that.

24 Q Well, do you think it would be
25 standard practice for SoCalGas to not have
26 recordings with Dispatch at the time that the
27 incident started?

28 A I don't recall what and know what

1 Dispatch's requirements are.

2 Q Okay. But you recall me reading a
3 data response to you that had noted that
4 SoCalGas records Dispatch communications,
5 correct?

6 A Yeah. That's what the data
7 response said.

8 Q Okay. So would SoCalGas have a
9 reason to have destroyed those
10 communications, those recordings? Excuse me.

11 A I do not believe that we'd have a
12 reason to destroy those documents. I do not
13 know what the policy is of that organization,
14 with regard to calls that come into Dispatch.

15 Q Okay. But this isn't just for
16 calls that come into Dispatch, but calls that
17 come into Dispatch that relate specifically
18 to the incident.

19 So, as an officer of SoCalGas, is
20 it your expectation then that Dispatch keep
21 recordings of its communications related to
22 the SS-25 incidents?

23 A Well, again, I do not know who the
24 legal hold was issued to. I know it was
25 issued to myself. If they were under the
26 legal hold and it did basically identify
27 recordings of those conversations, then I
28 would fully expect that they abided by the

1 legal hold. But I do not know if they were
2 issued the legal hold and whether it
3 addressed the recordings. Either way, the
4 MCR is really the document that goes out and
5 not the internal conversation. The MCR is
6 for internal communications.

7 Q Okay. So you -- I'm sorry. The
8 MCR -- there were a couple of things in that
9 statement. The MCR is for internal
10 communications, if I understood right, that
11 it was ultimately part of the MCR or a text
12 of the MC -- a text was actually provided to
13 SED; is that right?

14 A Well, it's my understanding SED
15 asked for a copy of the communications which
16 a copy of the MCR was provided. The MCR is
17 our process for message center of any
18 incident, not just the Aliso Canyon SS-25
19 incident, but any time we have an incident in
20 our system, there are MCRs that are generated
21 and communicated widely out through the
22 company. Several hundred people get those
23 MCRs on a regular basis and I must get
24 several a day.

25 Q Okay. And just with regards to the
26 recording, is SoCalGas -- does SoCalGas have
27 concerns that the recording was -- that it
28 was not able to provide the recording of the

1 communications with Dispatch to SED then?

2 A Again, I don't know what the
3 requirements of Dispatch are in the
4 recordings and so I can't speculate or opine
5 on that.

6 Q Do you know who can?

7 A I do not know.

8 Q Okay.

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

10 (Off the record.)

11 ALJ POIRIER: We will be back on the
12 record.

13 While we were off the record, we
14 discussed the timing of today's hearings.
15 SED indicated that the next line of
16 questioning would extend beyond the deadline
17 that we had discussed for today's hearing.
18 So we're going to end a little bit early for
19 today and we will recommence tomorrow at
20 10:00 a.m., with the cross of Mr. Schwecke.

21 Thank you, everybody. And we will
22 be off the record.

23 (Off the record.)

24 (Whereupon, at the hour of 3:51,
25 this matter having been continued to
26 10:00 a.m., March 19, 2021, virtually,
the Commission then adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
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