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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 3.550)

**SOUTHERN CALIFORNIA GAS LEAK
CASES**

THIS DOCUMENT RELATES TO:

**PRIVATE PLAINTIFFS' INDIVIDUAL
ACTIONS**

**JUDICIAL COUNCIL COORDINATION
PROCEEDINGS NO. 4861**

[Assigned for Purposes of Trial to: Honorable
John Shepard Wiley, Jr.]

**AMENDED DECLARATION OF R. REX
PARRIS IN SUPPORT OF PRIVATE
PLAINTIFFS' MOTION TO COMPEL
PRODUCTION OF PMQ GAS
COMPOSITION**

[Filed Concurrently with Separate Statement,
Motion to Compel, and Request for Judicial
Notice]

Date: June 29, 2018
Time: 11:00 a.m.
Dept.: 9 (Spring Street Courthouse)

DECLARATION OF R. REX PARRIS

I, R. Rex Parris, declare as follows:

1. I am an attorney licensed to practice in the State of California, and counsel of record for Private Plaintiff in this action. I make this declaration in support of Private Plaintiffs' Motion to Compel further deposition testimony of SoCalGas Person Most Qualified relating to gas composition at Aliso Canyon. Unless otherwise stated, I have personal knowledge of the facts set forth in this declaration and if called as a witness, could and would competently testify thereto.

2. Representatives from Private Plaintiffs' Executive Committee engaged in considerable discussion with Defendants, the builder plaintiffs, and the government plaintiffs to agree upon the processes for taking of depositions. On December 6, 2017, the parties through defense counsel submitted a Proposed Case Management Order No. 9 regarding Deposition Protocols for Fact Witnesses. The Court signed the Order the same date. Attached hereto and incorporated herein as **Exhibit A** is a true and correct copy of Case Management Order No. 9.

3. Plaintiffs' counsel for all parties then worked to prepare a notice of deposition for the person most knowledgeable, which captured the topics each of the different groups wanted covered at the deposition, and the initial notice was served by Government Plaintiffs on December 17, 2017.

4. Ultimately, the notice was amended two more times, and the second amended notice with the gas composition topics at issue in this motion to compel was served on March 20, 2018. Attached hereto and incorporated herein by this reference as **Exhibit B** is a true and correct copy of the Second Amended Notice of Deposition.

5. SoCalGas served objections to the Second Amended Notice on March 27, 2018. Attached hereto and incorporated herein by this reference as **Exhibit C** is a true and correct copy of Defendants' Objections to Second Amended Notice of Deposition.

6. Counsel for SoCalGas thereafter coordinated with Government Plaintiffs and Private Plaintiffs' counsel and set this deposition for May 1, 2018.

7. During the deposition, Morgan Lewis asserted over 340 objections during the four hours and thirty minutes of my questioning. Fewer than 100 objections went to form or privilege – potentially, the only valid deposition objections. Attached hereto and incorporated herein by this

1 reference as **Exhibit D** is a true and correct copy of May Lew's Deposition Transcript. Also
2 attached hereto and incorporated herein by this reference as **Exhibit E** is a true and correct copy of
3 the video of May Lew's Deposition.

4 8. During the deposition, Morgan Lewis made several speaking objections in an attempt
5 to coach the witness. After such objections, the witness would mimic back whatever phrase Morgan
6 Lewis objected with. On several occasions, Morgan Lewis would signal the witness or shake his
7 head in an effort to stop the witness from answering a question.

8 9. In the middle of cross-examination on a document showing the SoCalGas had a long
9 history of benzene testing, Morgan Lewis asked how long it would take to finish the questioning on
10 this document. Mr. Parris estimated five minutes, but this would depend on the witness. Morgan
11 Lewis left the conference room with a promise to return to complete the questioning on this
12 document, but instead Morgan Lewis returned to state that the witness was too tired to complete
13 even the questioning on this document. Morgan Lewis agreed to schedule the continued deposition
14 on a different date. On the record, there was a discussion about continuing the deposition on May 3,
15 but Morgan Lewis said instead they would bring the witness back "on a mutually convenient date in
16 the near future." (See Exhibit D at 317:24-318:14.)

17 10. The office of Plaintiff's liaison counsel emailed late on May 1, 2018 to propose
18 continuing the deposition of the person most qualified on gas composition on May 3, 2018, with a
19 proposed four hours of testimony anticipated. I emailed to express my concern to Morgan Lewis
20 that the deposition needed to be unobstructed, and I would not agree to time limitation given the
21 stream of objections taking up so much time during the deposition. Attached hereto and
22 incorporated herein by this reference as **Exhibit F** is a true and correct copy of Plaintiff's liaison
23 counsel email and my response.

24 11. On May 2, 2018, Morgan Lewis responded it would be bringing a motion for
25 protective order declaring the deposition was complete and suggesting for the first time Mr. Parris
26 improperly badgered the witness. Attached hereto and incorporated herein by this reference as
27 **Exhibit G** is a true and correct copy of Morgan Lewis response.

28 12. The meet and confer continued thereafter. On May 9, 2018, Morgan Lewis wrote to

1 Private Plaintiffs' Liaison Counsel, Paul Kiesel and copied Mr. Parris and over one dozen Plaintiffs'
2 attorneys. Morgan Lewis proceeded to explain in its letter that it intended to seek a protective order.
3 The purported basis was the conduct and questioning by Mr. Parris – Morgan Lewis claimed Mr.
4 Parris “was abusive to the witness and needlessly hostile to counsel.” Attached hereto and
5 incorporated herein by this reference as **Exhibit H** is a true and correct copy of Morgan Lewis's
6 letter.

7 13. Private Plaintiffs responded in detail on May 15, 2018 and expressed concerns about
8 several items, including the lack of citations to the record, leaving it impossible to determine the
9 basis of the letter from Morgan Lewis and suggesting the letter violated the LA Superior Court
10 Guidelines on Civility by attempting to create a record of events that had not occurred. Private
11 Plaintiffs also requested that Morgan Lewis participate in a meaningful meet and confer to address
12 the issues Plaintiffs intended to raise about the improper assertion of objections. Attached hereto and
13 incorporated herein by this reference as **Exhibit I** is a true and correct copy of Private Plaintiff's
14 response letter.

15 14. Three weeks ago, the Deputy Director for Los Angeles County Department of Public
16 Health (Angelo Bellomo) was asked by a KCBS News reporter: “Do you believe the people who live
17 around there are safe?” He answered: “Hard to say. Safety is an unanswered question at this point.”
18 This news report can be watched at: <http://losangeles.cbslocal.com/tag/porter-ranch>. The Deputy
19 Director for Los Angeles County Department of Public Health went on to report: “...they don't
20 know what's coming from the facility, because no nearby monitors measure chemicals other than
21 methane. There may be a lot of other chemicals coming from the field that are causing the
22 symptoms.” Bellomo says County air monitors need to be placed close to the wells.

23 15. On May 23, 2018, I took the deposition of the person SoCal Gas designated as the
24 PMQ regarding Operating Standards on Safety. She was unable to answer the question: “Is it safe
25 for people to live in Porter Ranch?” She testified: “I am -- I can't -- I'm not qualified to make a
26 determination as to the safety there...”

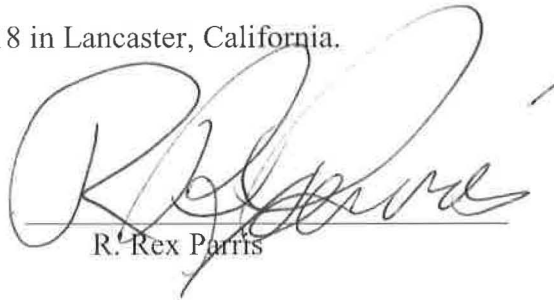
27 16. Because the deposition testimony sought is common benefit work, our billing rates
28 are capped and vary between \$500 and \$850 an hour based upon the experience of the legal team

1 members. Our office has significant litigation experience that warrants recognition of the work done
2 to protect the residents of Porter Ranch. We spent more than 7 hours researching; we spent more
3 than 5 hours reviewing the record; and we spent more than 37 hours drafting the motion,
4 declarations, separate statement and request for judicial notice. I anticipate spending an additional
5 12 hours reviewing SoCalGas opposition to this motion and drafting a reply brief. Finally, I
6 anticipate spending 8 hours preparing for and appearing at the hearing. This does not include the
7 additional costs for taking a second day of testimony. I will supplement my request for sanctions, if
8 appropriate, at the hearing on this motion. We are requesting sanctions in whatever amount the
9 Court deems reasonable.

10 I declare under penalty of perjury under the laws of the State of California and the United
11 States that the foregoing is true and correct.

12 Executed this 5th day of June, 2018 in Lancaster, California.

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R. Rex Parris

EXHIBIT A

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ATTORNEYS FOR DEFENDANTS
SOUTHERN CALIFORNIA GAS COMPANY AND
SEMPRA ENERGY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

**COORDINATION PROCEEDING
SPECIAL TITLE (Rule 3.550)**

**SOUTHERN CALIFORNIA GAS LEAK
CASES**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**JUDICIAL COUNCIL
COORDINATION PROCEEDING NO.
4861**

*Case Assigned for All Purposes to the Hon.
John Shepard Wiley, Jr., Department 311*

**[PROPOSED] CASE MANAGEMENT
ORDER NO. 9 REGARDING
DEPOSITION PROTOCOL FOR FACT
WITNESSES**

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

DEC 06 2017

Sherri R. Carter, Executive Officer/Clerk
By: Maribel Mata, Deputy

1 I. GENERAL PROVISIONS

2 A. General Provisions

3 1. This Order applies to fact witness depositions only. The parties agree to
4 work together to reach a separate stipulated order that will govern expert witness depositions.

5 2. Unless otherwise stated in this Order, California law applies to all fact
6 witness depositions taken in the above-captioned case.

7 B. Designees for Receipt of Notice and Information Relating to Depositions

8 The following individuals shall receive any notice relating to fact witness depositions,
9 including but not limited to scheduling and Notice of Intent to Appear: David Schrader and
10 Yardenia Zwang-Weissman on behalf of the Defendants; Paul Kiesel and Ray Boucher on behalf
11 of the Private Plaintiffs; Jessica Brown on behalf of the Government Plaintiffs; and Michael
12 Leslie on behalf of the Developer Plaintiffs.¹ Deposition notices shall also be served on Case
13 Anywhere.

14 C. Notice of Intent to Attend a Deposition

15 In order for counsel to make arrangements for adequate deposition space, written notice of
16 the names of those attorneys intending to attend a deposition shall be provided not fewer than five
17 (5) business days prior to the deposition, whenever feasible. Paul Kiesel's office shall provide the
18 names of all counsel representing the Private Plaintiffs who will attend; Jessica Brown's office
19 shall provide the names of all counsel representing the Government Plaintiffs who will attend;
20 Michael Leslie's office shall provide the names of all counsel representing the Developer
21 Plaintiffs who will attend; and David Schrader's office shall provide the names of all counsel
22 representing the Defendants who will attend. Unnecessary attendance by counsel is discouraged
23 and may not be compensated in any fee application to the Court. Counsel hosting the deposition
24 shall not be required to provide space for more than twenty (20) attending attorneys. Nothing in
25 this agreement will preclude each of the three Government Plaintiffs from seeking costs or fees

26 ¹ "Developer Plaintiffs" are those plaintiffs in the matters of Toll Brothers, Inc., et al. v. Sempra Energy, et al.
27 (BC674622). Inclusion of the Developer Plaintiffs in this Protocol, including agreement regarding the Developer
28 Plaintiffs' allotment of time for depositions as set forth herein, does not constitute agreement that there should be a
separate track for Developer Plaintiffs and does not waive the rights of any party to dispute or oppose the
designation of a separate Developer Plaintiffs track in this litigation.

1 for a representative attorney. Nothing in this agreement shall preclude a party from opposing any
2 request for cost or fees.

3 D. Scheduling

4 To the extent practicable, at least thirty (30) days in advance of scheduling proposed
5 depositions for a calendar week, counsel identified in Paragraph I.B., above, or their designees,
6 shall meet and confer in an effort to schedule the depositions proposed for the calendar week at
7 mutually convenient times and locations. To the extent that the parties cannot reach agreement
8 regarding scheduling of depositions of fact witnesses, the parties shall present the dispute to the
9 Court in a joint statement that includes each party's separately proposed schedule.

10 E. Deposition Day

11 Unless otherwise agreed, a deposition day shall generally commence at 9:00 a.m.
12 Variation from this schedule may be made by agreement of counsel who noticed the deposition
13 and counsel for the witness. Each deposition day shall have at least a 15-minute morning break
14 and a 15-minute afternoon break, with one (1) hour for lunch.

15 F. Costs

16 The noticing party shall bear the expense of stenographic recording, video recording (if
17 applicable), and any applicable witness fees. Motions to recover these costs and expenses may be
18 made at the conclusion of the litigation in accordance with applicable law. Nothing in this
19 agreement shall prevent a party from opposing such a motion.

20
21 II. CONDUCT OF DEPOSITIONS

22 A. Examination of Parties and Party-Affiliated² Witnesses

23 1. The Parties agree to meet and confer during the scheduling of fact witness
24 depositions to divide parties and party-affiliated witnesses into two separate groups for deposition
25 purposes, as further explained below.

26 2. Group One shall be comprised of parties and party-affiliated witnesses who

27 ² A "party affiliated" witness is a current employee, officer, director, managing agent, or consultant or a former
28 employee, officer, director, managing agent, or consultant of one or both Defendants who will be represented by
Defendants' counsel at the deposition.

1 had a finite role in the events underlying the claims in this lawsuit. The side (i.e., plaintiffs or
2 defendants) noticing a deposition shall have no more than seven (7) hours for direct examination
3 of a Group One party or party-affiliated witness. The side defending a Group One witness
4 deposition shall have up to thirty (30) minutes to question the witness. Thus, the total deposition
5 time for a party or party-affiliated Group One witness shall not exceed seven and one-half (7.5)
6 hours.

7 3. Group Two shall be comprised of parties and party-affiliated witnesses who had or
8 have a more substantial role than Group One witnesses in the events underlying the claims in this
9 lawsuit and, as a result, their depositions cannot reasonably be completed within one day. The
10 side (i.e., plaintiffs or defendants) noticing a deposition shall have no more than 14 hours to
11 conduct direct and re-direct examination of a Group Two party or party-affiliated witness. The
12 side defending a Group Two witness deposition shall have up to one hour to question the witness.
13 Thus, the total deposition time for a party or party-affiliated Group Two witness shall not exceed
14 fifteen (15) hours.

15 4. The Plaintiffs believe that some witnesses will require more than 14 hours for the
16 deposition and will notify Defendants of their intention to seek more than 14 hours for a
17 particular witness's deposition at least 30 days prior to the deposition.

18 5. If the parties are not able to agree on the designation of a party or party-affiliated
19 witness as either a Group One or Group Two witness, or to more than 14 hours for a particular
20 witness deposition, the parties shall bring the dispute to the Court for resolution, either by a
21 discovery conference or joint statement, at least ten (10) days before the scheduled deposition
22 date. The deposition shall not proceed until the dispute is resolved by the Court or mutual
23 agreement. The groups and time frames identified above do not apply to Person Most
24 Knowledgeable (PMK) depositions. The parties shall meet and confer on the time needed for any
25 PMK depositions, and if they are unable to agree, shall present the dispute to the Court for
26 resolution at least ten (10) days prior to the commencement of the deposition.

27 6. Questioning by Plaintiffs will be done by designated attorneys for the Private
28 Plaintiffs, Government Plaintiffs, and Developer Plaintiffs. In advance of the deposition, the

1 Plaintiff groups will decide among themselves which Plaintiff group will question the fact witness
2 first and how time for questioning will be allocated, within the allowed total time limits. Counsel
3 for Defendants shall be advised of the proposed order and allocation before the deposition
4 proceeds, and of any subsequent adjustments to the proposed order and allocation that may arise
5 during the deposition.

6 7. Unless agreed otherwise, the allocation of time for depositions noticed by
7 Plaintiffs is as follows:

8 a. For depositions taken in accordance with paragraphs 2-4 above, time will
9 be divided among the Plaintiff groups as follows: 45% to Private Plaintiffs, 45% to Government
10 Plaintiffs, and 10% to Developer Plaintiffs. Plaintiffs may reallocate the time, provided the
11 primary examination does not exceed the time permitted for the deposition as set forth in section
12 II.A above. Any reallocation must be put on the record.

13 b. No more than two (2) attorneys from the Private Plaintiffs, one attorney for
14 Developer Plaintiffs, and two (2) attorneys from the Government Plaintiffs, for a total of five (5)
15 attorneys, may question a witness provided, however, the questioning attorneys shall examine the
16 witness sequentially and otherwise avoid duplicative questioning and/or assertions of objections.

17 8. All “on-the-record” time shall count toward the time limits designated herein.

18 9. Notwithstanding the limitations expressed above, all deposition limitations may be
19 modified, by agreement of all parties or when necessary to fairly examine a deponent. Any
20 disputes regarding modification shall be brought to the Court for informal resolution either by
21 discovery conference or joint statement.

22 a. To the extent that any party contends that the time provided for herein is
23 insufficient to adequately complete a particular deposition, counsel for the party who has been
24 designated to examine the witness and counsel for the witness shall, prior to any relief being
25 sought from the Court, meet and confer in an attempt to reach agreement on the length of the
26 deposition.

27 b. If the parties cannot agree on whether additional time is needed, the Court
28 shall decide on a deposition-by-deposition basis. The party seeking additional time must arrange

1 for the dispute to be brought before the Court in sufficient time to be resolved before the
2 commencement of the deposition or upon realization that additional time will be needed, but in no
3 instance later than the next court day following the deposition. In addition, if the conduct of the
4 witness or counsel defending the deposition prevents the deposition from being completed within
5 the time permitted, a party may seek additional time from the Court promptly after the deposition
6 otherwise concludes.

7 B. Examination of Third Party Witnesses

8 The counsel identified in paragraph I.B., or their designees, shall meet and confer at least
9 10 days in advance of a third party fact witness deposition to discuss and agree upon allocation of
10 time. If they cannot agree, the parties will present the dispute to the Court in advance of the
11 deposition. The deposition shall not proceed until the dispute is resolved by the Court or by
12 agreement between the parties.

13 C. Objections

14 Each side shall identify one attorney responsible for making any objections. Unless
15 otherwise specified, an objection by such counsel shall be deemed an objection by all similarly
16 situated counsel (i.e., all plaintiffs or all defendants). However, unless otherwise specified, an
17 instruction not to answer by counsel should not be deemed an instruction not to answer by any
18 other similarly situated counsel.

19 D. Location of Depositions

20 During the meet and confer regarding deposition scheduling described in Paragraph I.D.
21 above, the parties shall also discuss the location of each deposition and attempt to reach
22 agreement on where the deposition will take place. The parties will make best efforts to take all
23 depositions in the City of Los Angeles as set forth below. In the absence of agreement, California
24 law shall apply.

25 1. For depositions of witnesses affiliated with Defendants, the deposition will be held
26 at the offices of Morgan Lewis & Bockius, 300 S. Grand Avenue, Los Angeles, CA. For
27 witnesses not required to appear for deposition in the City of Los Angeles, Defendants will advise
28 Plaintiffs of any alternative location at least ten (10) days prior to the deposition. If the parties

1 cannot agree on an alternative location, the parties shall bring the dispute to the Court at least
2 seven (7) days before the scheduled deposition date for informal resolution either by conference
3 call or joint statement.

4 2. For depositions of witnesses affiliated with one or more of the Government
5 Plaintiffs, the deposition will be held at the offices of Miller Barondess LLP, 1999 Avenue of the
6 Stars, Suite 1000, Los Angeles, CA; and

7 3. For depositions of Private Plaintiffs or witnesses affiliated with one or more
8 Private Plaintiffs, the deposition will be held at the offices of Golkow Court reporting services,
9 555 W. 5th Street, 32nd Floor, Los Angeles, CA, or at the offices of Private Plaintiffs' counsel in
10 the City of Los Angeles to be identified at least ten (10) days before the deposition.

11 4. For depositions of witnesses affiliated with the Developer Plaintiffs, at the offices
12 of Boies Schiller Flexner LLP, 725 S. Figueroa St., 31st Floor, Los Angeles, CA 90017.

13 5. The parties shall meet and confer prior to the depositions to discuss necessary
14 equipment needs.

15 E. Telephonic Participation

16 Arrangements shall be made at the deposition location to allow parties to participate in the
17 conduct of the depositions by telephone. Anyone who is listening to the deposition telephonically
18 or by other means must be identified for the record. The Court Reporter shall take telephonic
19 appearances ten (10) minutes before the start of the deposition (i.e., at 8:50 a.m. for a deposition
20 scheduled to start at 9:00 a.m.). Counsel appearing by telephone shall mute their telephones.
21 Technical difficulties with telephonic appearances shall not constitute grounds for continuing or
22 terminating the deposition or for rendering deposition testimony inadmissible that would
23 otherwise be admissible in evidence. Counsel participating in the deposition in-person may
24 terminate the arrangements for remote participation at any time during the deposition if it is
25 disrupting the deposition. Nothing herein is meant to prevent counsel participating remotely in
26 the deposition from communicating with co-counsel.

1 F. Documents Used in Connection with Depositions

2 1. Production of Documents in Connection with Depositions

3 a. Production of custodial documents for Defendants' custodians shall be
4 governed by the terms of the Alternative Discovery Plan. If additional custodial documents
5 encompassed by the Alternative Discovery Plan are identified after the production of a custodial
6 file, Defendants shall produce such documents as expeditiously as feasible prior to the deposition.
7 If such documents are produced less than three (3) business days prior to the scheduled
8 deposition, Plaintiffs may continue the deposition.

9 b. Custodial documents for Plaintiffs' custodians, to the extent not previously
10 produced, shall be produced as expeditiously as feasible prior to the deposition. If additional
11 custodial documents are produced less than three (3) business days prior to the deposition,
12 Defendants may continue the deposition.

13 2. Use of Documents at Deposition

14 a. Deposing counsel shall provide to each of the questioning counsel
15 personally attending a deposition copies of the documents on which deposing counsel expects to
16 examine a deponent.

17 b. Documents that have been previously produced shall be referred to by the
18 Bates number appearing on the document and shall be assigned an exhibit number at the
19 deposition. Documents that have not been previously produced and/or that do not have Bates
20 numbers shall be assigned an exhibit number at the deposition.

21 c. All exhibits shall be marked with the following numbers and symbols in
22 the following order: (1) the number of the deponent in the case (e.g., if deponent is the 12th
23 deponent, regardless of the party on whose behalf the witness is appearing, the first number
24 would be "12"); (2) a hyphen; and (3) the sequential number of that exhibit at the particular
25 deposition. Thus, for example, if the deponent is the 12th deponent in the order of depositions,
26 and that deponent is being showed the first exhibit at that deposition, the exhibit would be marked
27 as follows: 12-1. In the case of multiple depositions occurring on or about the same date,
28

1 deposition liaison counsel for the Parties shall meet and confer in advance of the depositions and
2 decide which deponent will be given which deponent number.

3 3. Objections to Documents.

4 Objections to the relevance or admissibility of documents used as deposition exhibits not
5 made during the deposition are not waived, and are reserved for later ruling by the Court.

6 G. Video Depositions

7 The video operator shall preserve custody of the original video medium (tape or DVD) in
8 its original condition until further order of the Court. Copies shall be provided to the parties upon
9 request and at the requesting party(ies)'s expense. No part of the video or audio recording of a
10 video deposition shall be released or made available to any member of the public, except for use
11 in these proceedings in accordance with the terms of the Protective Order entered in this JCCP
12 ("Protective Order").

13 H. Deposition Transcripts

14 1. Corrections to a deposition shall be listed on an errata sheet, which the deponent
15 shall submit to the court reporter within thirty (30) days of the deponent's, or his or her counsel's
16 receipt of the final transcript, whichever is earlier. The court reporter shall serve copies of the
17 errata sheet on all parties purchasing the transcript. The parties may upon agreement modify this
18 requirement as may be necessary. Any modification shall be placed on the record at the
19 deposition.

20 2. If no corrections are made within 30 days after receipt of the transcript from the
21 court reporter, and if good cause is not shown for an extension of the 30 days' limitation, the
22 parties shall have the right to use a certified copy of the transcript in any further proceedings as
23 though the copy were the original transcript.

24 3. Each party shall bear its own costs in securing copies of the deposition transcript
25 and exhibits, videotape, or DVD from the court reporter.

26 I. Treatment of Confidential Documents or Testimony

27 All parties shall comply with the Protective Order. Certain documents that may be used in
28 depositions may be designated "Confidential" or otherwise protected under the terms of the

1 Protective Order because (a) the parties have so agreed; (b) a party has designated the document
2 to be Confidential pursuant to the Protective Order; or (c) the Court has so ordered. Attendance
3 at any portion of a deposition in which documents that are designated as “Confidential” or
4 otherwise subject to that designation shall be restricted to those persons authorized by the
5 Protective Order to view such documents. This restriction includes those attending a deposition
6 telephonically. Any portion of the deposition transcript containing Confidential Information shall
7 be handled in the manner set forth in the Protective Order. Confidential portions of deposition
8 transcripts may be opened, read, and used only for purposes as permitted by the terms of the
9 Protective Order.

10 J. Stipulation Regarding the Transcript

11 1. Depositions of Parties: Unless otherwise agreed, the following stipulation shall
12 apply to all depositions taken of parties and party-affiliated witnesses in this JCCP and shall be
13 included in each transcript by the court reporter:

14 Upon completion of the transcription of this deposition, the original transcript shall be
15 sent to counsel for the witness by the court reporter. Counsel shall promptly forward it to the
16 witness for review, correction, and signature under penalty of perjury. Within 30 days of
17 receiving the transcript from the court reporter, the witness’s counsel shall forward the original
18 transcript plus corrections to the court reporter, who will promptly notify (a) all counsel who
19 questioned the witness and (b) the counsel identified in Paragraph I.B., above of its receipt and
20 any changes made by the witness. The parties may shorten this time period by agreement and, if
21 the parties cannot agree, the party seeking a shortened time period may seek relief from the Court.

22 2. If a party or party-affiliated witness is not represented by counsel, the original
23 transcript will be sent to the witness by the court reporter. After review, correction, and signature
24 within 30 days from the date of receipt, the witness shall return the original transcript to the court
25 reporter, who will notify all counsel of its receipt and any changes to testimony made by the
26 witness. The parties may shorten this time period by agreement and, if the parties cannot agree,
27 the party seeking a shortened time period may seek relief from the Court.

3. The court reporter will provide the original transcript to the first examining attorney. That attorney shall be responsible for maintaining the original transcript and will make it available for any hearings or trials upon reasonable request by another party. In the event the original transcript is lost, stolen, or otherwise unavailable, a certified copy reflecting any changes made to the original transcript may be used in place of the original.

4. Depositions of Third Parties: The stipulation set forth above shall be proposed to counsel for any third party witness or, if such witness is not represented by counsel, to the witness.

III. AMENDMENTS TO THIS ORDER

Minor amendments and changes to this Order for any one deposition, such as the time allotted for questioning, dates, and counsel permitted to attend depositions, may be made by agreement of the parties without further order of the Court. All such minor amendments shall be placed on the record at the beginning of the deposition or as soon as practicable. Changes to the terms of this Order that apply to the procedure as a whole shall be brought to the Court, after the parties first meet and confer in good faith.

Dated: December 6, 2017

IT IS SO ORDERED.

JOHN SHEPARD WILEY JR.

Dated: DEC 06 2017

Hon. John Shepard Wiley, Jr.

1 **PROOF OF SERVICE**

2 I am a resident of the State of California and over the age of eighteen years, and not a
3 party to the within action; my business address is 300 South Grand Avenue, Twenty-Second
4 Floor, Los Angeles, California 90071-3132.

5 On December 6, 2017, I served the within document(s):

6 **PROPOSED] CASE MANAGEMENT ORDER NO. 9 REGARDING DEPOSITION**
7 **PROTOCOL FOR FACT WITNESSES**

8 ☒ by electronic service **via Case Anywhere**: I attached a true and correct copy of the
9 above-entitled document(s) to **Case Anywhere** by electronic transfer for service on all
10 counsel of record by electronic service pursuant to the Order Authorizing Electronic
Service. This service complies with C.C.P. § 1010.6.

11 and

12 ☒ **BY MAIL**: (C.C.P. § 1013(a)) - by placing the document(s) listed above in a sealed
13 envelope with postage thereon fully prepaid, in the United States mail at Los Angeles,
14 California addressed as set forth below. I am readily familiar with the firm's practice
15 of collection and processing correspondence for mailing. Under that practice it would
be deposited with the U.S. Postal Service on that same day with postage thereon fully
prepaid in the ordinary course of business. I am aware that on motion of the party
served, service is presumed invalid if postal cancellation date or postage meter date is
more than one day after date of deposit for mailing in affidavit.

16 **SEE ATTACHED SERVICE LIST**

17 Executed on December 6, 2017, at Los Angeles, California.

18 I declare under penalty of perjury, under the laws of the State of California, that the above
19 is true and correct.

20 
21 _____
22 Lisa Wright

SERVICE LIST

COUNSEL/PARTIES NOT ON CASEANYWHERE AND COUNSEL IN CASES NOT YET COORDINATED IN JCCP

Stacy Choi 611 South Catalina Street #212 Los Angeles, CA 90005	Pro Per Plaintiff in <i>Choi v. Southern California Gas Company, et al.</i> ; LASC, Limited Jurisdiction Case No. 16K00605
Kyung Hee Kim 611 South Catalina Street #212 Los Angeles, CA 90005	Pro Per Plaintiff in <i>Kim v. Southern California Gas Company, et al.</i> ; LASC, Limited Jurisdiction Case No. 15K15982
Steven Wolfson, Esq. Law Offices of Steven Wolfson 4766 Park Granada Boulevard, Suite 208 Calabasas, CA 91302	Counsel for Plaintiffs in <i>Constantino v. Southern California Gas Company, et al.</i> ; LASC, Case No. BC612705 - Coordinated with JCCP 3/4/16 ; and <i>Mulholland v. Southern California Gas Company, et al.</i> ; LASC, Case No. BC618460 - Coordinated with JCCP 5/12/16
Dro Zarik Menassian Menassian Law Firm LLP 1615 W. Mines Avenue, Suite A1 Montebello, CA 90640	Counsel for Plaintiffs in <i>Menassian Holdings, LLC; et al. v. Southern California Gas Company, et al.</i> LASC Case No. PC056974 (Chatsworth) – Coordination Pending
Jesse S. Salas Law Office of Jesse S. Salas 1721 W. Fern Avenue Redlands, CA 92373	Counsel for Plaintiffs in <i>Steven Collis v. Sempra Energy, et al.</i> ; LASC Case No. BC621933 - Coordinated with JCCP 7/27/16
James Benedetto Benedetto Law Group 2372 Morse Avenue, Suite 130 Irvine, CA 92614	Counsel for Plaintiffs in <i>John Carnevali, et al. v. Southern California Gas Company, et al.</i> ; LASC Case No. BC642372 - Coordinated with JCCP 12/21/2016
Garabed Kamarian Kamarian Law, Inc. 210 North Glenoaks Boulevard, Suite D Burbank, CA 91502	Counsel for Plaintiffs in <i>Avetis Altunyan, et al. v. Southern California Gas Company, et al.</i> ; LASC Case No. BC644950 - Coordinated with JCCP 4/5/2017
Loren N. Meador Gurvitz, Marlowe & Ferris LLP 21800 Oxnard Street, Suite 1080 Warner Center Towers Woodland Hills, CA 91367	Counsel for Plaintiffs in <i>J. Scott Ferris, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC659414
James A. Morris Shane Greenberg BRENT COON & ASSOCIATES 4111 West Alameda Avenue Suite 611 Burbank, CA 91505	Counsel for Plaintiffs in <i>Michael Kimler, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC662247 - Coordinated with JCCP 6/13/2017

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Gene Shioda LAW OFFICES OF GENE H. SHIODA 5757 West Century Boulevard, Suite 700 Los Angeles, CA 90045	Counsel for Plaintiffs in <i>Jae Jo Lee, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC661995
Joseph S. Farzam Matthew Evans JOSEPH FARZAM LAW FIRM 11766 Wilshire Boulevard, Suite 280 Los Angeles, CA 90025	Counsel for Plaintiffs in <i>Charles Chang, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC667207
Jack Ter-Saakyan Michael Avanesian JT Legal Group, APC 801 North Brand Boulevard, Suite 1130 Glendale, CA 91203	Counsel for Plaintiffs in <i>Eliahu Dolgin, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC669310 - Coordinated with JCCP 8/8/2017
Ani Gevshenian Law Offices of Ani Gevshenian 3500 West Olive Avenue, Suite 300 Burbank, CA 91505	Counsel for Plaintiffs in <i>Sam Gevshenian, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC670137
Dean A. Mensah Esther Sampong 16940 Chatsworth Street, #201 Granada Hills, CA 91394	Pro Per Plaintiff in <i>Dean A. Mensah and Esther Sampong v. Southern California Edison Company aka ("SOCALGAS")</i> , Case No. BC662644 - Coordinated with JCCP 8/22/2017
Matthew J. Geragos GERAGOS LAW GROUP 888 West 6th Street, Suite 1100 Los Angeles, CA 90017	Counsel for Plaintiffs in <i>Judie Agajanian v. Southern California Gas Company, et al.</i> , LASC Case No. BC674250
Gary C. Eisenberg Law Offices of Gary C. Eisenberg 5010 North Parkway Calabasas, Suite 100 Calabasas, CA 91302	Counsel for Plaintiffs in <i>Angel Turcios, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC675006
Anthony T. Nehme NEHME LAW FIRM 800 W. 6th Street, Suite 1410 Los Angeles, CA 90017	Counsel for Plaintiffs in <i>Hassan Chiha, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC679279
Maro Burunsuzyan David L. Scott LAW OFFICES OF MARO BURUNSUZYAN 601 East Glenoaks Blvd., Suite 210 Glendale, CA 91207	Counsel for Plaintiffs in <i>Nora Nalbantian, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC676023
Sean M. Novak THE NOVAK LAW FIRM, P.C. 8383 Wilshire Blvd., Suite 634 Bevely Hills, CA 90211	Counsel for Plaintiffs in <i>Jeffrey Heller, et al. v. Southern California Gas Company, et al.</i> , LASC Case No. BC677938

1 Nicholas J.P. Wagner Counsel for Plaintiffs in *Jordan Burton, et al. v.*
2 Andrew B. Jones *Southern California Gas Company, et al.*, LASC
3 WAGNER, JONES, KOPFMAN, Case No. BC678095
4 & ARTENIAN LLP
1111 E. Herndon, Suite 317
Fresno, CA 93720

5 Loren Nizinski Counsel for Plaintiffs in *Richard Rose, et al. v.*
6 LAW OFFICES OF LOREN NIZINSKI *Southern California Gas Company, et al.*, LASC
14622 Victory Boulevard, Second Floor Case No. BC680558
7 Van Nuys, CA 91411

8 Nigol Manoukian Counsel for Plaintiffs in *Edwin Manoukian, et al.*
9 Manoukian & Associates *v. Southern California Gas Company, et al.*,
1560 The Midway St. LASC Case No. BC680593
Glendale, CA 92108

10 Michael V. Jehdian Counsel for Plaintiffs in *Colina Jehdian, et al. v.*
11 LAW OFFICES OF MICHAEL V. *Southern California Gas Company, et al.*, LASC
JEHDIAN, APC Case No. BC680760
12 550 North Brand Blvd., Suite 2150
Glendale, CA 91203

13 Edward F. Quigley Counsel for Plaintiffs in *Shapell Properties, Inc.,*
14 Robert R. Begland, Jr. *et al. v. Southern California Gas Company, et al.*,
COX, CASTLE & NICHOLSON LLP LASC Case No. BC680771
2029 Century Park East, Suite 2100
15 Los Angeles, CA 90067-3284

16 Lynda Sheridan Counsel for Plaintiffs in *Nicole Shepherd, et al. v.*
17 LAW OFFICES OF LYNDA SHERIDAN *Southern California Gas Company, et al.*, LASC
1801 Century Park East, Suite 1100 Case No. BC680696
18 Los Angeles, CA 90067

EXHIBIT B

XAVIER BECERRA, Attorney General of California
SALLY MAGNANI, Senior Assistant Attorney General
ROBERT W. BYRNE, Senior Assistant Attorney General
SARAH E. MORRISON, Supervising Deputy Attorney General (SBN 143459)
CATHERINE M. WIEMAN, Deputy Attorney General (SBN 222384)
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Telephone (213) 269-6328 / Facsimile (213) 897-2802

*Attorneys for Plaintiff the People of the State of California,
by and through the Attorney General, in his independent
capacity and on behalf of the California Air Resources Board*

MICHAEL N. FEUER, City Attorney (SBN 111529)
TINA L. HESS, Assistant City Attorney (SBN 143900)
JESSICA B. BROWN, Supervising Deputy City Attorney (SBN 211642)
JACLYN BLANKENSHIP, Deputy City Attorney (SBN 267524)
NICK KARNOW, Deputy City Attorney (SBN 210805)
OFFICE OF THE LOS ANGELES CITY ATTORNEY
200 North Main Street, 500 City Hall East
Los Angeles, California 90012-4131
Telephone (213) 473-6922 / Facsimile (213) 978-8112

*Attorneys for Plaintiff the People of the State of California,
by and through the Los Angeles City Attorney's Office*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES - CENTRAL CIVIL WEST

**COORDINATION PROCEEDING
SPECIAL TITLE [RULE 3.550]**

**JUDICIAL COUNSEL COORDINATION
PROCEEDING NO. 4861**

**SOUTHERN CALIFORNIA GAS LEAK
CASES**

*Case Assigned for All Purposes to the
Honorable John Shepard Wiley, Jr.
Department 311*

**SECOND AMENDED NOTICE OF
DEPOSITION OF DEFENDANT,
SOUTHERN CALIFORNIA GAS
COMPANY, BY PLAINTIFF THE
PEOPLE OF THE STATE OF
CALIFORNIA [GROUP 2]**

THIS DOCUMENT RELATES TO:

*The People of the State of California, et al. v.
Southern California Gas Company (Case No.
BC602973)*

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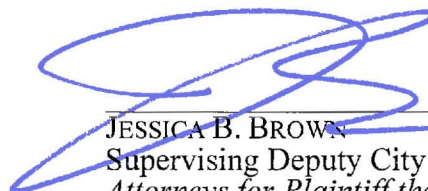
**SECOND AMENDED NOTICE OF DEPOSITION OF DEFENDANT, SOUTHERN CALIFORNIA GAS
COMPANY, BY PLAINTIFF THE PEOPLE OF THE STATE OF CALIFORNIA [GROUP 2]**

1 PLEASE TAKE NOTICE that pursuant to California Code of Civil Procedure sections
2 2025.010 *et seq.*, Plaintiff, the People of the State of California, by and through the Attorney
3 General, the California Air Resources Board, and the City of Los Angeles ("Plaintiff"), will take
4 the deposition of Defendant Southern California Gas Company ("SoCalGas") on the matters
5 detailed in Exhibit A attached hereto.¹ The deposition will begin on April 3, 2018 at 300 S. Grand
6 Avenue, Los Angeles, CA, commencing at 9:00 a.m., and will continue from day to day thereafter
7 (not including Saturdays, Sundays, or holidays) until completed in accordance with the provisions
8 of CMO No. 9. The deposition will be taken before a certified shorthand reporter who is duly
9 authorized to take and transcribe the deposition testimony. The deposition will be recorded
10 stenographically, and may be recorded through the use of instant visual display of the testimony,
11 as well as audio and/or video technology.

12 PLEASE TAKE FURTHER NOTICE that pursuant to CMO No. 9, SoCalGas shall
13 produce documents for inspection as further detailed in Exhibit A attached hereto on or before
14 March 29, 2018.

15 Dated: 3/20/18

16 MICHAEL N. FEUER
17 City Attorney

18 

19 JESSICA B. BROWN
20 Supervising Deputy City Attorney
21 *Attorneys for Plaintiff the People*
22 *of the State of California, by and through*
23 *the Los Angeles City Attorney's Office*

24 ¹ Pursuant to mutual agreement of the parties, Plaintiff is serving this second amended deposition
25 notice to ensure that Plaintiff can timely begin the deposition(s) of SoCalGas on the topics
26 identified herein. The parties are continuing to meet and confer regarding dates for these
27 depositions, as well as the order in which they shall proceed. By serving this Second Amended
28 Notice of Deposition, Plaintiff does not waive its right to depose SoCalGas on all topics identified
in the December 15, 2017 Notice of Deposition, Plaintiff's meet and confer letters, or
subsequently discovered or identified.

1 Dated:

XAVIER BECERRA

Attorney General of California

2 SALLY MAGNANI, Senior Assistant Attorney General

ROBERT W. BYRNE, Senior Assistant Attorney General

3 SARAH E. MORRISON

Supervising Deputy Attorney General

4 ELIZABETH B. RUMSEY

Deputy Attorney General

5
6
7 
CATHERINE M. WIEMAN

8 Deputy Attorney General

Attorneys for Plaintiff the People

9 *of the State of California, by and through*

10 *the Attorney General, in his independent capacity and on*

11 *behalf of the California Air Resources Board*
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1 **EXHIBIT A**

2 Pursuant to California Code of Civil Procedure Sections 2025.230 and 2025.280,
3 SoCalGas "shall designate and produce at the deposition those of its officers, directors, managing
4 agents, employees or agents who are most qualified to testify on its behalf as to" the matters set
5 forth below, and shall produce for inspection and copying all documents identified below.

6 **Definitions**

7 1. The term "FACILITY" means and refers to the Aliso Canyon underground natural
8 gas storage facility located at 12801 Tampa Avenue, Northridge, CA 91326.

9 2. The term "SoCalGas" means defendant Southern California Gas Company.

10 3. The term "SEMPRA" means Sempra Energy, a defendant in JCCP No. 4861.

11 4. The term "OPERATING STANDARD" means any standard policy, procedure,
12 practice, protocol, plan, manual, system, or manner of conducting a specific task, whether formal
13 or informal, that is or was adopted, implemented or used by SoCalGas or any EMPLOYEE or
14 agent of SoCalGas, including the terms of any such OPERATING STANDARD, the methods and
15 means used for carrying out such OPERATING STANDARD, the implementation of such
16 OPERATING STANDARD, and the identity of those PERSONS responsible for managing and/or
17 implementing such OPERATING STANDARD.

18 5. The terms "PERSON" or "PERSONS" include a natural person, firm, association,
19 organization, partnership, business, trust, corporation, or public entity.

20 6. The term "EMPLOYEE" means any PERSON employed by SoCalGas and/or
21 SEMPRA, or hired as an independent contractor by SoCalGas and/or SEMPRA to conduct work
22 at or relating to the FACILITY.

23 7. The term "COMPUTER SYSTEMS AND PROGRAMS" means any computer
24 network, hard drive, electronic media storage device, software, or other computer programs or
25 applications, and/or any means to store or process electronic data utilized by SoCalGas. The terms
26 "DOCUMENT" and "DOCUMENTS" shall mean any writing, as defined by California Evidence
27 Code Section 250, and include written, recorded, filmed or graphic matter, whether produced or
28 reproduced on papers, cards, tapes, film, electronic, facsimile, computer storage device, or any

1 other media, and/or any other means of preserving thought or expression, and/or all tangible things
2 in which information can be processed, printed, or transcribed. Without limiting the generality of
3 the foregoing, the terms "DOCUMENT" and "DOCUMENTS" shall include anything prepared or
4 presented by records, letters, messages, telegrams, fax, telex, and e-mail; all contracts, recitals,
5 statements, memoranda, studies, surveys, charts, reports, minutes, notes, diaries, schedules,
6 invoices, canceled checks, account statements, audits, charts, well logs, well records, diagrams,
7 journals, logs, drafts, photographs, releases, newspaper or magazine articles, books, financial
8 statements, ledgers, transcripts, affidavits, tapes, tape recordings, videotapes or recordings, motion
9 pictures, phonograph recordings, compact disk, flash drive, optical disk, material read by laser
10 scanning, computer disks, computer floppy diskettes, computer tapes, computer printouts, and/or
11 information stored in data processing or retrieval systems, whether originals, copies or drafts,
12 however produced or reproduced.

13 8. The term INCIDENT refers to the Standard Sesnon 25 (API 037-00776) well leak
14 that YOU allege began on or about October 23, 2015 and continued until the well was declared
15 permanently sealed on February 17, 2016. For purposes of these requests, INCIDENT also
16 includes all efforts to respond to the leak and/or to address the cause and consequences of the leak,
17 including efforts to abate the release of gas from the well and to safeguard public health and safety
18 and/or the environment.

19 **Deposition Topics**

20 NOTICE IS HEREBY GIVEN that, pursuant to section 2025.230 of the Code of Civil
21 Procedure, SoCalGas shall designate and produce at the deposition one or more of its officers,
22 directors, managing agents, employees, or agents who are most qualified to testify on its behalf as
23 to each of the following matters:

24 5. SoCalGas' OPERATING STANDARDS concerning FACILITY emergency
25 response, including but not limited to: well and/or equipment failure, leaks, and or large-scale
26 failure at the FACILITY from January 1, 1978 to December 31, 2003.

1 6. SoCalGas' OPERATING STANDARDS concerning FACILITY emergency
2 response, including but not limited to: well and/or equipment failure, leaks, and or large-scale
3 failure at the FACILITY from January 1, 2004 to the present.

4 7. SoCalGas' OPERATING STANDARDS concerning operation of the wells at the
5 FACILITY from January 1, 1978 to December 31, 2003.

6 8. SoCalGas' OPERATING STANDARDS concerning operation of the wells at the
7 FACILITY from January 1, 2004 to the present.

8 9. SoCalGas' OPERATING STANDARDS concerning maintenance of wells
9 including but not limited to: basic upkeep, detection of maintenance and/or repair needs, minor
10 repairs, and/or significant repairs at the FACILITY from January 1, 1978 to December 31, 2003.

11 10. SoCalGas' OPERATING STANDARDS concerning maintenance of wells
12 including but not limited to: basic upkeep, detection of maintenance and/or repair needs, minor
13 repairs, and/or significant repairs at the FACILITY from January 1, 2004 to the present.

14 11. [INTENTIONALLY LEFT BLANK]

15 12. [INTENTIONALLY LEFT BLANK]

16 13. SoCalGas' OPERATING STANDARDS concerning FACILITY asset integrity
17 including but not limited to: identification of assets, identification of asset needs, identification of
18 improvements and/or upgrades to assets, prioritization of asset repairs and/or upgrades at the
19 FACILITY from January 1, 1978 to December 31, 2003.

20 14. SoCalGas' OPERATING STANDARDS concerning FACILITY asset integrity
21 including but not limited to: identification of assets, identification of asset needs, identification of
22 improvements and/or upgrades to assets, prioritization of asset repairs and/or upgrades at the
23 FACILITY from January 1, 2004 to the present.

24 15. SoCalGas' OPERATING STANDARDS concerning the operation, maintenance,
25 repair, inspection, monitoring, and testing of underground storage wells at the FACILITY from
26 January 1, 1978 to December 31, 2003.

1 16. SoCalGas' OPERATING STANDARDS concerning the operation, maintenance,
2 repair, inspection, monitoring, and testing of underground storage wells at the FACILITY from
3 January 1, 2004 to the present.

4 17. SoCalGas' OPERATING STANDARDS concerning safety procedures protecting
5 the interests of residents and businesses within a 10-mile radius of the FACILITY from January 1,
6 1978 to December 31, 2003.

7 18. SoCalGas' OPERATING STANDARDS concerning safety procedures protecting
8 the interests of residents and businesses within a 10-mile radius of the FACILITY from January 1,
9 2004 to the present.

10 19. SoCalGas' OPERATING STANDARDS concerning monitoring and or
11 remediating air borne contaminants produced by or released by the FACILITY from January 1,
12 1978 to December 31, 2003.

13 20. SoCalGas' OPERATING STANDARDS concerning monitoring and/or
14 remediating air borne contaminants produced by or released by the FACILITY from January 1,
15 2004 to the present.

16 21. SoCalGas' OPERATING STANDARDS concerning operational tolerances,
17 including but not limited, gas volume, pressure, and makeup as well as their impact on operation
18 of the FACILITY from January 1, 1978 to December 31, 2003.

19 22. SoCalGas' OPERATING STANDARDS concerning operational tolerances,
20 including but not limited, gas volume, pressure, and makeup as well as their impact on operation
21 of the FACILITY from January 1, 2004 to the present.

22 23. SoCalGas' OPERATING STANDARDS for assessing and or monitoring reservoir
23 formation integrity at the FACILITY, from January 1, 1978 to December 31, 2003.

24 24. SoCalGas' OPERATING STANDARDS for assessing and or monitoring reservoir
25 formation integrity at the FACILITY, from January 1, 2004 to the present.

26 25. SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance
27 with rules or regulations issued by the California Department of Conservation, Division of Oil,
28 Gas, and Geothermal Resources, from January 1, 1978 to December 31, 2003.

1 26. SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance
2 with rules or regulations issued by the California Department of Conservation, Division of Oil,
3 Gas, and Geothermal Resources, from January 2, 2004 to the present.

4 27. SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance
5 with rules or regulations issued by the California Public Utilities Commission from January 1,
6 1978 to December 31, 2003.

7 28. SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance
8 with rules or regulations issued by the California Public Utilities Commission from January 1,
9 2004 to the present.

10 29. SoCalGas' financial planning, budgeting, and cost projections as to the operation,
11 maintenance, repair, inspection, monitoring, and testing of underground storage wells at the
12 FACILITY from January 1, 2004 to the present.

13 30. SoCalGas' financial planning, budgeting, and cost projections as to capital
14 planning for underground storage wells at the FACILITY from January 1, 2004 to the present.

15 31. SoCalGas' safety-related committees, including the roles, responsibilities, chain(s)
16 of command, and personnel assigned to such committees, from January 1, 2004 to the present.

17 32. SoCalGas' audit-related committees, including the roles, responsibilities, chain(s)
18 of command, and personnel assigned to such committees, from January 1, 2004 to the present.

19 33. SEMPRA's oversight of and involvement in day-to-day decisions pertaining to
20 underground storage wells at the FACILITY from January 1, 2004 to the present.

21 34. SoCalGas' response to the INCIDENT, including but not limited to, detection of
22 the release, stopping the release, repair of SS-25, and any/or other actions taken by SoCalGas at
23 the FACILITY in response to and/or as a result of the INCIDENT.

24 35. SEMPRA's response to the INCIDENT, including but not limited to, detection of
25 the release, stopping the release, repair of SS-25, and any/or other actions taken by SEMPRA at
26 the FACILITY in response to and/or as a result of the INCIDENT.

1 36. The contents of the gas stored at the FACILITY the week before the INCIDENT,
2 including but not limited to, the constituents and/or components of the gas, quantities of each
3 constituent, and total quantities.

4 37. The contents of the gas stored at the FACILITY during the five (5) years prior to
5 the INCIDENT, including but not limited to, the constituents and/or components of the gas,
6 quantities of each constituent, and total quantities.

7 38. SoCalGas' air monitoring, emissions testing, air sampling, and/or any
8 quantification of released gas and other constituents as a result of the INCIDENT.

9 39. SoCalGas's knowledge about health effects and/or potential harm to human
10 health that would be posed by or related to emissions of gas and/or other chemicals, material, or
11 constituents from Well SS-25 and/or any other wells at Aliso Canyon prior to and up to the date of
12 the INCIDENT.

13 40. SoCalGas's knowledge about health effects and/or potential harm to human
14 health that would be posed by or related to emissions of gas and/or other chemicals, material, or
15 constituents from Well SS-25 and/or any other wells at Aliso Canyon from the date of the
16 INCIDENT to the present.

17 41. SoCalGas's knowledge about and responses to complaints, notices, notifications,
18 orders, warnings, correspondence and/or information (other than by litigation consultants and/or
19 expert witnesses) relating to health risks and/or potential harm to human health posed by the
20 INCIDENT.

21 42. SoCalGas's knowledge about health effects and/or potential harm to human
22 health that would be impacted by the "killing" of Well SS-25 in February 2016 and continuing to
23 the present.

24 43. SoCalGas's knowledge about property damage and/or potential harm to property
25 that would be posed by or related to emissions of gas and/or other chemicals, material, or
26 constituents from Well SS-25 and/or any other wells at Aliso Canyon prior to and up to the date of
27 the INCIDENT.

1 44. SoCalGas's knowledge about property damage and/or potential harm to property
2 that would be posed by or related to emissions of gas and/or other chemicals, material, or
3 constituents from Well SS-25 and/or any other wells at Aliso Canyon from the date of the
4 INCIDENT to the present.

5 45. SoCalGas's knowledge about and responses to complaints, notices, notifications,
6 orders, warnings, correspondence and/or information (other than by litigation consultants and/or
7 expert witnesses) relating to property damage and/or potential harm to property posed by the
8 INCIDENT.

9 46. SoCalGas's knowledge about property damage and/or potential harm to property
10 that would be impacted by the "killing" of Well SS-25 in February 2016 and continuing to the
11 present.

12 47. SoCalGas' implementation, funding of, and reimbursement associated with the
13 Temporary Relocation Program.

14 48. Post-INCIDENT leaks or releases at or from the FACILITY and causes thereof.

15 49. SoCalGas's response to post-INCIDENT leaks or releases at or from the
16 FACILITY.

17 50. SEMPRA's response to post-INCIDENT leaks or releases at or from the
18 FACILITY.

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NOTICE IS FURTHER GIVEN that SoCalGas is required to produce, or identify by specific
tes Number(s) if already produced, the following DOCUMENTS at least five (5) days prior to
time of the relevant designee's deposition:

1. For each matter identified above, please produce all DOCUMENTS reviewed with, utilized by, and/or relied upon by the deponent to prepare for his or her deposition testimony.
2. For each matter identified above, please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the issues, topics, and/or events described therein or associated therewith.
3. For each deponent, please produce a copy of his or her current resume or CV, as well as a copy of any and all prior testimony, whether provided in an individual or representative capacity, including any and all deposition testimony, trial testimony, sworn statements, affidavits, declarations, expert reports, and/or testimony before a legislative, regulatory or investigative body or agency.

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, Rosa Borrelli am employed in the County of Los Angeles, State of California, and I am over the age of eighteen years and I am not a party to the within action. My business address is 200 North Main Street, Room 500 City Hall East, Los Angeles, California 90012.

On March 20, 2018, I served a copy the foregoing document(s) described as

SECOND AMENDED NOTICE OF DEPOSITION OF DEFENDANT, SOUTHERN CALIFORNIA GAS COMPANY, BY PLAINTIFF THE PEOPLE OF THE STATE OF CALIFORNIA [GROUP 2]

on all the interested parties **BY ELECTRONIC SERVICE LIST VIA CASE ANYWHERE:** Based on the Order Authorizing Electronic Service and parties' stipulation, I served the above-mentioned documents(s) electronically via Case Anywhere. I uploaded a true and correct copy of the above-entitled documents to Case Anywhere and initiated service on the appropriate parties. This service complies with Cal. Civ. Pro. Code Section 1010.6.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 20, 2018, at Los Angeles, California.

Rosa Borrelli
Rosa Borrelli

EXHIBIT C

MORGAN, LEWIS & BOCKIUS LLP
JAMES J. DRAGNA, SBN 91492
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ATTORNEYS FOR DEFENDANTS
SOUTHERN CALIFORNIA GAS COMPANY AND
SEMPRA ENERGY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

**COORDINATION PROCEEDING
SPECIAL TITLE (Rule 3.550)**

**SOUTHERN CALIFORNIA GAS LEAK
CASES**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**JUDICIAL COUNCIL
COORDINATION PROCEEDING NO.
4861**

*Case Assigned for All Purposes to the Hon.
John Shepard Wiley, Jr., Department 311*

**DEFENDANT SOUTHERN
CALIFORNIA GAS COMPANY'S
OBJECTIONS TO SECOND
AMENDED NOTICE OF DEPOSITION
OF DEFENDANT, SOUTHERN
CALIFORNIA GAS COMPANY, BY
PLAINTIFF THE PEOPLE OF THE
STATE OF CALIFORNIA [GROUP 2]**

Pursuant to section 2025.410, *et seq.* of the California Code of Civil Procedure, Defendant Southern California Gas Company ("SoCalGas" or "Defendant") hereby objects to Plaintiff the People of the State of California, by and through the Attorney General, the California Air Resources Board, and the City of Los Angeles' ("Plaintiffs") Second Amended Notice of Deposition of Defendant, Southern California Gas Company [Group 2] ("Notice"), served on or about March 20, 2018 as set forth below. Defendant reserves the right to amend and/or supplement its objections, as necessary and appropriate, in the future and reserves all rights under the California Code of Civil Procedure and Case Management Orders entered in this action.

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1. Some of the events that may be relevant to the matters addressed by the Notice occurred decades ago. As a result, individuals with personal knowledge of certain topics identified in the Notice are unavailable to SoCalGas. SoCalGas objects to this Notice on the ground that the lack of temporal limits renders the Notice unduly burdensome, oppressive and harassing to Defendants. In agreeing to produce a witness in connection with any specific Topic, SoCalGas is not admitting that it is required to answer any individual specific question or that any question during the deposition is within the scope of the Topic.

2. SoCalGas objects that Plaintiffs' document demands and each and every Request violate the August 14, 2017 Alternative Discovery Plan ("ADP") (and Case Management Order No. 9 ("CMO No. 9")), which expressly applies to documents requested in connection with a deposition notice, as set forth in Sections 1, 9, and 12 thereto. Specifically, SoCalGas objects that Plaintiffs' Requests are oppressive, unduly burdensome, harassing and duplicative in that they seek the same information that has already been searched for and produced pursuant to the terms of the ADP and unduly burdensome to the point of harassing to the extent Plaintiffs seek the specific identification of documents that have already been produced in the various productions. Further, to the extent Plaintiffs' Requests extend to topics or date ranges outside the scope of the ADP, Plaintiffs are required to, but did not, "meet and confer in good faith to determine whether the requested documents and ESI could be produced by modifying the ADP pursuant to Section 10" (ADP, Section 6). SoCalGas, therefore, likewise objects that the Requests are overly broad as to time and scope, oppressive, unduly burdensome and harassing on this basis as well. Plaintiffs' attempts to seek documents fully outside of the negotiated ADP process imposes an extreme burden on SoCalGas, which has spent countless hours over many months to review and produce numerous documents under the procedures and schedule specified and agreed to by all parties. SoCalGas will not produce documents that have not already been produced pursuant to

1 the ADP in response to the Notice. In providing information and/or producing or identifying
2 documents dated outside of the scope of the topics or date ranges specified in the ADP, if any,
3 SoCalGas does not waive this objection.

4 3. SoCalGas objects to the extent Plaintiffs seek information and/or documents that
5 are the subject of ongoing meet and confer processes between the Parties pursuant to the ADP
6 and will not produce or otherwise identify such information or documents in connection with this
7 Notice.

8 4. SoCalGas objects to the time requested for production of documents as it is
9 unreasonably short, unduly burdensome, and an inappropriate attempt to evade the timeframe
10 provided for the production of documents under California Code of Civil Procedure section
11 2031.260 and, as described above and applicable here, the agreed-to scope, process and
12 timeframe specified in the ADP.

13 5. SoCalGas objects generally to each Topic and Request to the extent that they call
14 for the production and/or disclosure of privileged information, including but not limited to
15 information and documents protected by the attorney-client privilege, the work product doctrine,
16 and any other applicable privilege or protection. SoCalGas makes any response on the condition
17 that the inadvertent production and/or disclosure of such information does not waive any of
18 SoCalGas' rights to protect such information and that SoCalGas may withdraw any such
19 information inadvertently produced and/or disclosed as soon as it is identified.

20 6. SoCalGas objects generally to each Topic and Request insofar as they are vague,
21 ambiguous, overly broad as to time and scope with respect to the issues in this litigation, unduly
22 burdensome, harassing, duplicative, oppressive, and to the extent they seek information that is
23 neither relevant to the subject matter of this action nor reasonably calculated to lead to the
24 discovery of admissible evidence.

25 7. SoCalGas objects generally to each Topic and Request to the extent they seek
26 trade secrets and/or confidential, sensitive or proprietary documents or information protected by
27 the right of privacy and/or other applicable law. Any such information is currently subject to the
28 Protective Order — Confidential Designation Only [CMO No. 4] entered by the Court on

1 August 12, 2016 and shall be marked as such. SoCalGas makes any response on the condition
2 that the inadvertent production and/or disclosure of such information does not waive any of
3 SoCalGas' rights to protect such information and that SoCalGas may withdraw any such
4 information inadvertently produced and/or disclosed as soon as it is identified.

5 8. SoCalGas objects generally to each Topic and Request to the extent they purport to
6 impose obligations of disclosure beyond those required by the California Code of Civil
7 Procedure, any other applicable law, and/or any Case Management Orders and agreements
8 reached by the parties.

9 9. SoCalGas objects generally to each Topic and Request to the extent that they call
10 for a legal conclusion, assume facts not in evidence, or fall within the purview of expert discovery
11 and call for expert opinion.

12 10. SoCalGas objects generally to each Topic and Request to the extent that they seek
13 information or documents that are or may be subject to confidentiality restrictions imposed by
14 CPUC in the exercise of its exclusive jurisdiction, in conjunction with DOGGR, to investigate the
15 root cause of the SS-25 failure.

16 11. SoCalGas objects generally to each Topic and Request to the extent that they seek
17 to require it to provide information other than that which may be obtained through a reasonably
18 diligent search of SoCalGas' records.

19 12. SoCalGas objects generally to each Topic and Request to the extent that they seek
20 to require it to provide information which is publicly available or otherwise equally available to
21 the Plaintiffs as to SoCalGas.

22 13. SoCalGas objects generally to each Topic and Request to the extent that they seek
23 to require it to respond on behalf of any entity other than SoCalGas.

24 14. If Plaintiffs assert an interpretation of any aspect of the Topics or Requests that is
25 different from the interpretation that SoCalGas has of those Topics or Requests, SoCalGas
26 reserves the right to supplement its objections and/or responses. No response herein to any of the
27 Topics or Requests should be deemed or construed as a representation that SoCalGas agrees with
28 or acquiesces in the characterization of any fact, assumption or conclusion of law contained in or

1 implied by the Notice.

2 15. No express, incidental or implied admissions are intended by SoCalGas' testimony
3 or these responses. The fact that SoCalGas may agree to testify or provide information or
4 documents in response to a particular Topic or Request is not intended, and shall not be
5 construed, as an admission that SoCalGas accepts or admits the existence of any such information
6 or document set forth in or assumed by such Topic or Request, or that any such information or
7 document constitutes admissible evidence. The fact that SoCalGas may agree to provide
8 information or documents in response to a particular Topic or Request is not intended, and shall
9 not be construed, as a waiver by SoCalGas of any part of any objection to such Topic or Request
10 or any part of any general objection made herein.

11 16. Without waiving any of the foregoing objections, each of which is expressly
12 incorporated into each individual response below as if fully stated therein, SoCalGas expressly
13 reserves the following rights:

14 a. Any and all testimony, information, and/or documents that may be
15 produced by SoCalGas in response to the Notice is and will remain subject to all objections as to
16 relevance, materiality, propriety, and admissibility, as well as to any and all other objections on
17 any grounds that would require the exclusion of the testimony, information, or document or any
18 portion thereof if such information or document was offered in evidence, all of which objections
19 and grounds are hereby expressly reserved and may be interposed at the time of any written
20 discovery, deposition, or at or before any hearing, arbitration or trial in this matter;

21 b. The right to object on any ground whatsoever at any time to any demand
22 for further responses to the Notice or any other discovery procedures involving or relating to the
23 subject matter of the Notice;

24 c. The right to change, amend, or supplement their objections, responses and
25 production of documents in light of information gathered through further investigation and
26 discovery, including, but not limited to, the right to use discovered documents and documents
27 now known but whose relevance, significance, or applicability has not yet been ascertained.
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SPECIFIC OBJECTIONS TO DEFINITIONS

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2 1. SoCalGas objects to the definition of the phrase “OPERATING STANDARD” as
3 vague and ambiguous and overbroad to the extent it covers topics and documents that are not
4 relevant to any claim asserted by Plaintiffs or any defense of SoCalGas in this matter. SoCalGas
5 interprets “OPERATING STANDARD” to mean the formal policy or policies governing the
6 specific subject of the identified Topic. SoCalGas does not interpret “OPERATING
7 STANDARD” to include legal precedent, rules or regulations issued by any governing body or
8 agency, and/or third-party industry standard documents that may inform SoCalGas’ policies.
9 SoCalGas further objects to the definition of “OPERATING STANDARD” in its inclusion of
10 “the methods and means for carrying out such OPERATING STANDARD, [or] the
11 implementation of such OPERATING STANDARD” as overbroad and unduly burdensome and
12 for failing to specify with reasonable particularity a topic on which information is sought to the
13 extent it encompasses any specific act or instance of implementation of an “OPERATING
14 STANDARD.” SoCalGas interprets “OPERATING STANDARD” to include “the methods and
15 means for carrying out such OPERATING STANDARD, [or] the implementation of such
16 OPERATING STANDARD,” only to the extent such methods and means and implementation
17 procedures are set forth in the topic policy or policies.

18 2. SoCalGas objects to the definition of the terms “PERSON” and
19 “PERSONS” as being overly broad, vague and ambiguous, and unduly burdensome, insofar as it
20 fails to reasonably define the scope of information sought and seeks information that is not
21 relevant to the subject matter of this litigation and not likely to lead to the discovery of admissible
22 evidence.

23 3. SoCalGas objects to the definition of the term “EMPLOYEE” as being overly
24 broad, vague and ambiguous, and unduly burdensome, insofar as it fails to reasonably define the
25 scope of information sought and seeks information that is not relevant to the subject matter of this
26 litigation and not likely to lead to the discovery of admissible evidence.

27 4. SoCalGas objects to the definition of the term “INCIDENT” as being overly
28 broad, vague and ambiguous, and unduly burdensome, insofar as it fails to reasonably define the

1 scope of information sought and seeks information that is not relevant to the subject matter of this
2 litigation and not likely to lead to the discovery of admissible evidence.

3 The following responses are provided subject to the foregoing Specific Objections to
4 Definitions, which are incorporated into the responses.

5 **SPECIFIC RESPONSES AND OBJECTIONS TO DEPOSITION TOPICS**

6 **TOPIC NO. 5:**

7 SoCalGas' OPERATING STANDARDS concerning FACILITY emergency response,
8 including but not limited to: well and/or equipment failure, leaks, and or large scale failure at the
9 FACILITY from January 1, 1978 to December 21, 2003.

10 **RESPONSE TO TOPIC 5:**

11 SoCalGas reasserts and incorporates each of the General Objections and Specific
12 Objections to Definitions as set forth above.

13 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
14 as the undefined terms "emergency response," "well," "equipment failure," "leaks" and "large
15 scale failure," as vague and ambiguous.

16 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
17 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
18 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

19 SoCalGas objects to this Topic to the extent it seeks information that is protected by
20 privilege, including but not limited to information protected by the attorney-client privilege, the
21 attorney work product doctrine and any other applicable privilege or protection.

22 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
23 private information.

24 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
25 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
26 agreeable time and location, and subject to further meet and confer, to provide non-privileged
27 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
28 response plans for emergency conditions related to underground gas storage wells at the Aliso

1 Canyon facility.

2 **TOPIC NO. 6:**

3 SoCalGas' OPERATING STANDARDS concerning FACILITY emergency response,
4 including but not limited to: well and/or equipment failure, leaks, and or large scale failure at the
5 FACILITY from January 1, 2004 to the present.

6 **RESPONSE TO TOPIC NO. 6:**

7 SoCalGas reasserts and incorporates each of the General Objections and Specific
8 Objections to Definitions as set forth above.

9 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
10 as the undefined terms "emergency response," "well," "equipment failure," "leaks" and "large
11 scale failure," as vague and ambiguous.

12 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
13 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
14 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

15 SoCalGas objects to this Topic to the extent it seeks information that is protected by
16 privilege, including but not limited to information protected by the attorney-client privilege, the
17 attorney work product doctrine and any other applicable privilege or protection.

18 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
19 private information.

20 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
21 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
22 agreeable time and location, and subject to further meet and confer, to provide non-privileged
23 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
24 response plans for emergency conditions related to underground gas storage wells at the Aliso
25 Canyon facility.

26 **TOPIC NO. 7:**

27 SoCalGas' OPERATING STANDARDS concerning operation of the wells at the
28 FACILITY from January 1, 1978 to December 31, 2003.

1 **RESPONSE TO TOPIC NO. 7:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
5 as the undefined terms "operation" and "wells," as vague and ambiguous.

6 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
7 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
8 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

9 SoCalGas objects to this Topic to the extent it seeks information that is protected by
10 privilege, including but not limited to information protected by the attorney-client privilege, the
11 attorney work product doctrine and any other applicable privilege or protection.

12 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
13 private information.

14 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
15 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
16 agreeable time and location, and subject to further meet and confer, to provide non-privileged
17 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
18 procedures governing operation of underground gas storage wells at the Aliso Canyon facility.
19 Consistent with the objections stated herein and for purposes of clarifying the scope of the Topic
20 on which the witness or witnesses will be prepared to testify, SoCalGas interprets the term
21 "operation" to mean injection, withdrawal, and other related activities by SoCalGas on
22 underground gas storage wells at the Aliso Canyon facility that are owned by SoCalGas.

23 **TOPIC NO. 8:**

24 SoCalGas' OPERATING STANDARDS concerning operation of the wells at the
25 FACILITY from January 1, 2004 to present.

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1 **RESPONSE TO TOPIC NO. 8:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
5 as the undefined terms "operation" and "wells," as vague and ambiguous.

6 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
7 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
8 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

9 SoCalGas objects to this Topic to the extent it seeks information that is protected by
10 privilege, including but not limited to information protected by the attorney-client privilege, the
11 attorney work product doctrine and any other applicable privilege or protection.

12 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
13 private information.

14 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
15 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
16 agreeable time and location, and subject to further meet and confer, to provide non-privileged
17 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
18 procedures governing operation of underground gas storage wells at the Aliso Canyon facility.
19 Consistent with the objections stated herein and for purposes of clarifying the scope of the Topic
20 on which the witness or witnesses will be prepared to testify, SoCalGas interprets the term
21 "operation" to mean injection, withdrawal, and other related activities by SoCalGas on
22 underground gas storage wells at the Aliso Canyon facility that are owned by SoCalGas.

23 **TOPIC NO. 9:**

24 SoCalGas' OPERATING STANDARDS concerning maintenance of wells including but
25 not limited to: basic upkeep, detection of maintenance and/or repair needs, minor repairs, and/or
26 significant repairs at the FACILITY from January 1, 1978 to December 31, 2003.

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1 **RESPONSE TO TOPIC NO. 9:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
5 as the undefined terms "maintenance," "wells," "basic upkeep," "detection of maintenance and/or
6 repair needs," "minor repairs" and "significant repairs," as vague and ambiguous.

7 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
8 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 SoCalGas objects to this Topic to the extent it seeks information that is protected by
11 privilege, including but not limited to information protected by the attorney-client privilege, the
12 attorney work product doctrine and any other applicable privilege or protection.

13 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
14 private information.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
17 agreeable time and location, and subject to further meet and confer, to provide non-privileged
18 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
19 procedures governing the maintenance of underground gas storage wells at the Aliso Canyon
20 facility. Consistent with the objections stated herein and for purposes of clarifying the scope of
21 the Topic on which the witness or witnesses will be prepared to testify, SoCalGas interprets the
22 term "maintenance" to mean activities undertaken by SoCalGas or at its direction to ensure that
23 underground gas storage wells at the Aliso Canyon facility that are owned by SoCalGas are in
24 appropriate condition and working order for their intended use.

25 **TOPIC NO. 10:**

26 SoCalGas' OPERATING STANDARDS concerning maintenance of wells including but
27 not limited to: basic upkeep, detection of maintenance and/or repair needs, minor repairs, and/or
28 significant repairs at the FACILITY from January 1, 2004 to present.

1 **RESPONSE TO TOPIC NO. 10:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
5 as the undefined terms "maintenance," "wells," "basic upkeep," "detection of maintenance and/or
6 repair needs," "minor repairs" and "significant repairs," as vague and ambiguous.

7 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
8 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 SoCalGas objects to this Topic to the extent it seeks information that is protected by
11 privilege, including but not limited to information protected by the attorney-client privilege, the
12 attorney work product doctrine and any other applicable privilege or protection.

13 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
14 private information.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
17 agreeable time and location, and subject to further meet and confer, to provide non-privileged
18 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
19 procedures governing the maintenance of underground gas storage wells at the Aliso Canyon
20 facility. Consistent with the objections stated herein and for purposes of clarifying the scope of
21 the Topic on which the witness or witnesses will be prepared to testify, SoCalGas interprets the
22 term "maintenance" to mean activities undertaken by SoCalGas or at its direction to ensure that
23 underground gas storage wells at the Aliso Canyon facility that are owned by SoCalGas are in
24 appropriate condition and working order for their intended use.

25 **TOPIC NO. 11:**

26 [INTENTIONALLY LEFT BLANK]

27 **TOPIC NO. 12:**

28 [INTENTIONALLY LEFT BLANK]

1 **TOPIC NO. 13:**

2 SoCalGas' OPERATING STANDARDS concerning FACILITY asset integrity including
3 but not limited to: identification of assets, identification of asset needs, identification of
4 improvements and/or upgrades to assets, prioritization of asset repairs and/or upgrades at the
5 FACILITY from January 1, 1978 to December 31, 2003.

6 **RESPONSE TO TOPIC NO. 13:**

7 SoCalGas reasserts and incorporates each of the General Objections and Specific
8 Objections to Definitions as set forth above.

9 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
10 as the undefined terms "asset integrity," "assets," "asset needs," "improvements," "upgrades" and
11 "repairs," as vague and ambiguous.

12 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
13 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
14 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

15 SoCalGas objects to this Topic to the extent it seeks information that is protected by
16 privilege, including but not limited to information protected by the attorney-client privilege, the
17 attorney work product doctrine and any other applicable privilege or protection.

18 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
19 private information.

20 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
21 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
22 agreeable time and location, and subject to further meet and confer, to provide non-privileged
23 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
24 procedures governing the identification of improvements or upgrades to underground gas storage
25 assets and the prioritization of improvements and upgrades to underground gas storage assets.
26 Consistent with the objections stated herein and for purposes of clarifying the scope of the Topic
27 on which the witness or witnesses will be prepared to testify, SoCalGas interprets the term "asset"
28 to mean and refer to facility infrastructure, large operating equipment, and underground gas

1 storage wells used for injection and/or withdrawal at the Aliso Canyon facility.

2 **TOPIC NO. 14:**

3 SoCalGas' OPERATING STANDARDS concerning FACILITY asset integrity including
4 but not limited to: identification of assets, identification of asset needs, identification of
5 improvements and/or upgrades to assets, prioritization of asset repairs and/or upgrades at the
6 FACILITY from January 1, 2004 to the present.

7 **RESPONSE TO TOPIC NO. 14:**

8 SoCalGas reasserts and incorporates each of the General Objections and Specific
9 Objections to Definitions as set forth above.

10 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
11 as the undefined terms "asset integrity," "assets," "asset needs," "improvements," "upgrades" and
12 "repairs," as vague and ambiguous.

13 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
14 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
15 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 SoCalGas objects to this Topic to the extent it seeks information that is protected by
17 privilege, including but not limited to information protected by the attorney-client privilege, the
18 attorney work product doctrine and any other applicable privilege or protection.

19 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
20 private information.

21 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
22 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
23 agreeable time and location, and subject to further meet and confer, to provide non-privileged
24 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
25 procedures governing the identification of improvements or upgrades to underground gas storage
26 assets and the prioritization of improvements and upgrades to underground gas storage assets.
27 Consistent with the objections stated herein and for purposes of clarifying the scope of the Topic
28 on which the witness or witnesses will be prepared to testify, SoCalGas interprets the term "asset"

1 to mean and refer to facility infrastructure, large operating equipment, and underground gas
2 storage wells used for injection and/or withdrawal at the Aliso Canyon facility.

3 **TOPIC NO. 15:**

4 SoCalGas' OPERATING STANDARDS concerning the operation, maintenance, repair,
5 inspection, monitoring, and testing of underground storage wells at the FACILITY from
6 January 1, 1978 to December 31, 2003.

7 **RESPONSE TO TOPIC NO. 15:**

8 SoCalGas reasserts and incorporates each of the General Objections and Specific
9 Objections to Definitions as set forth above.

10 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
11 as the undefined terms "operation," "maintenance," "repair," "inspection," "monitoring,"
12 "testing" "and "underground storage wells," as vague and ambiguous.

13 SoCalGas objects to this Topic to the extent it is duplicative, overbroad as to time and
14 scope, unduly burdensome, harassing, and seeks information that is neither relevant to the subject
15 matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 SoCalGas objects to this Topic to the extent it seeks information that is protected by
17 privilege, including but not limited to information protected by the attorney-client privilege, the
18 attorney work product doctrine and any other applicable privilege or protection.

19 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
20 private information.

21 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
22 because Topic No. 15 is substantively duplicative of Topic Nos. 7 and 9 as to operation,
23 maintenance, and repair, SoCalGas incorporates by reference its responses to Topic Nos. 7 and 9,
24 above. SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
25 agreeable time and location, and subject to further meet and confer, to provide non-privileged
26 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
27 procedures governing inspection, monitoring, and testing of underground storage wells at the
28 Aliso Canyon facility.

1 **TOPIC NO. 16:**

2 SoCalGas' OPERATING STANDARDS concerning the operation, maintenance, repair,
3 inspection, monitoring, and testing of underground storage wells at the FACILITY from January
4 1, 2004 to the present.

5 **RESPONSE TO TOPIC NO. 16:**

6 SoCalGas reasserts and incorporates each of the General Objections and Specific
7 Objections to Definitions as set forth above.

8 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
9 as the undefined terms "operation," "maintenance," "repair," "inspection," "monitoring,"
10 "testing" "and "underground storage wells," as vague and ambiguous.

11 SoCalGas objects to this Topic to the extent it is duplicative, overbroad as to time and
12 scope, unduly burdensome, harassing, and seeks information that is neither relevant to the subject
13 matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

14 SoCalGas objects to this Topic to the extent it seeks information that is protected by
15 privilege, including but not limited to information protected by the attorney-client privilege, the
16 attorney work product doctrine and any other applicable privilege or protection.

17 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
18 private information.

19 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
20 because Topic No. 16 is substantively duplicative of Topic Nos. 8 and 10 as to operation,
21 maintenance, and repair, SoCalGas incorporates by reference its responses to Topic Nos. 8 and
22 10, above. SoCalGas will produce, as applicable, a witness or witnesses in due course at a
23 mutually-agreeable time and location, and subject to further meet and confer, to provide non-
24 privileged testimony, to the extent not previously provided, regarding the following: SoCalGas'
25 policies and procedures governing inspection, monitoring, and testing of underground storage
26 wells at the Aliso Canyon facility.

27 **TOPIC NO. 17:**

28 SoCalGas' OPERATING STANDARDS concerning safety procedures protecting the

1 interests of residents and businesses within a 10-mile radius of the FACILITY from January 1,
2 1978 to December 31, 2003.

3 **RESPONSE TO TOPIC NO. 17:**

4 SoCalGas reasserts and incorporates each of the General Objections and Specific
5 Objections to Definitions as set forth above.

6 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
7 as the undefined terms "safety procedures," "protecting" and "interests," as vague and
8 ambiguous. SoCalGas interprets this Topic to exclude SoCalGas policies and standards relating
9 to the inspection, operation and maintenance of Aliso Canyon facility underground gas storage
10 wells and equipment, and, instead, to only include policies and standards specifically focusing on
11 residents and/or business in the adjacent community.

12 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
13 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
14 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

15 SoCalGas objects to this Topic to the extent it seeks information that is protected by
16 privilege, including but not limited to information protected by the attorney-client privilege, the
17 attorney work product doctrine and any other applicable privilege or protection.

18 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
19 private information.

20 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
21 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
22 agreeable time and location, and subject to further meet and confer, to provide non-privileged
23 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
24 procedures for addressing the interests of and/or communicating with the public in the event of a
25 significant well-related event at the Aliso Canyon facility. Consistent with the objections stated
26 herein and for purposes of clarifying the scope of the Topic on which the witness or witnesses
27 will be prepared to testify, SoCalGas interprets the phrase "significant well-related event" to
28 mean any event related to an underground gas storage well that required notification to Cal-OES

1 or other then in-effect emergency notification program. Consistent with the objections stated
2 herein and for purposes of clarifying the scope of the Topic on which the witness or witnesses
3 will be prepared to testify, SoCalGas interprets the phrase "addressing the interests of . . . the
4 public" to mean communicating with and providing information to the public in connection with
5 a "significant well-related event."

6 **TOPIC NO. 18:**

7 SoCalGas' OPERATING STANDARDS concerning safety procedures protecting the
8 interests of residents and businesses within a 10-mile radius of the FACILITY from
9 January 1, 2004 to the present.

10 **RESPONSE TO TOPIC NO. 18:**

11 SoCalGas reasserts and incorporates each of the General Objections and Specific
12 Objections to Definitions as set forth above.

13 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
14 as the undefined terms "safety procedures," "protecting" and "interests," as vague and
15 ambiguous. SoCalGas interprets this Topic to exclude SoCalGas policies and standards relating
16 to the inspection, operation and maintenance of Aliso Canyon facility underground gas storage
17 wells and equipment, and, instead, to only include polices and standards specifically focusing on
18 residents and/or business in the adjacent community.

19 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
20 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
21 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 SoCalGas objects to this Topic to the extent it seeks information that is protected by
23 privilege, including but not limited to information protected by the attorney-client privilege, the
24 attorney work product doctrine and any other applicable privilege or protection.

25 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
26 private information.

27 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
28 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-

1 agreeable time and location, and subject to further meet and confer, to provide non-privileged
2 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
3 procedures for addressing the interests of and/or communicating with the public in the event of a
4 significant well-related event at the Aliso Canyon facility. Consistent with the objections stated
5 herein and for purposes of clarifying the scope of the Topic on which the witness or witnesses
6 will be prepared to testify, SoCalGas interprets the phrase "significant well-related event" to
7 mean any event related to an underground gas storage well that requires notification to Cal-OES.
8 Consistent with the objections stated herein and for purposes of clarifying the scope of the Topic
9 on which the witness or witnesses will be prepared to testify, SoCalGas interprets the phrase
10 "addressing the interests of . . . the public" to mean communicating with and providing
11 information to the public in connection with a "significant well-related event."

12 **TOPIC NO. 19:**

13 SoCalGas' OPERATING STANDARDS concerning monitoring and or remediating air
14 borne contaminants produced by or released by the FACILITY from January 1, 1978 to
15 December 31, 2003.

16 **RESPONSE TO TOPIC NO. 19:**

17 SoCalGas reasserts and incorporates each of the General Objections and Specific
18 Objections to Definitions as set forth above.

19 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
20 as the undefined terms "monitoring," "remediating," "air borne contaminants" and "produced by
21 or released by the FACILITY," as vague and ambiguous. SoCalGas interprets this Topic to only
22 include natural gas and other substances potentially produced or released from an underground
23 gas storage well or related equipment in connection with underground storage operations at the
24 Aliso Canyon facility and to exclude other substances produced by or released by other events,
25 actions or operations on the Aliso Canyon facility property unrelated to underground storage
26 operations.

27 SoCalGas objects to this Topic to the extent it is duplicative, overbroad as to time and
28 scope, unduly burdensome, harassing, and seeks information that is neither relevant to the subject

1 matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

2 SoCalGas objects to this Topic to the extent it seeks information that is protected by
3 privilege, including but not limited to information protected by the attorney-client privilege, the
4 attorney work product doctrine and any other applicable privilege or protection.

5 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
6 private information.

7 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
8 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
9 agreeable time and location, and subject to further meet and confer, to provide non-privileged
10 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
11 procedures for monitoring planned and unplanned releases of natural gas (and its components)
12 into the outdoor air at the Aliso Canyon facility. Consistent with the objections stated herein and
13 for purposes of clarifying the scope of the Topic on which the witness or witnesses will be
14 prepared to testify, SoCalGas interprets the phrase "monitoring" to mean air monitoring
15 performed by SoCalGas or at its direction intended to detect emissions of natural gas (and its
16 components).

17 **TOPIC NO. 20:**

18 SoCalGas' OPERATING STANDARDS concerning monitoring and or remediating air
19 borne contaminants produced by or released by the FACILITY from January 1, 2004 to the
20 present.

21 **RESPONSE TO TOPIC NO. 20:**

22 SoCalGas reasserts and incorporates each of the General Objections and Specific
23 Objections to Definitions as set forth above.

24 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
25 as the undefined terms "monitoring," "remediating," "air borne contaminants" and "produced by
26 or released by the FACILITY," as vague and ambiguous. SoCalGas interprets this Topic to only
27 include natural gas and other substances potentially produced or released from an underground
28 gas storage well or related equipment in connection with underground storage operations at the

1 Aliso Canyon facility and to exclude other substances produced by or released by other events,
2 actions or operations on the Aliso Canyon facility property unrelated to underground storage
3 operations.

4 SoCalGas objects to this Topic to the extent it is duplicative, overbroad as to time and
5 scope, unduly burdensome, harassing, and seeks information that is neither relevant to the subject
6 matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

7 SoCalGas objects to this Topic to the extent it seeks information that is protected by
8 privilege, including but not limited to information protected by the attorney-client privilege, the
9 attorney work product doctrine and any other applicable privilege or protection.

10 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
11 private information.

12 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
13 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
14 agreeable time and location, and subject to further meet and confer, to provide non-privileged
15 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
16 procedures for monitoring planned and unplanned releases of natural gas (and its components)
17 into the outdoor air at the Aliso Canyon facility. Consistent with the objections stated herein and
18 for purposes of clarifying the scope of the Topic on which the witness or witnesses will be
19 prepared to testify, SoCalGas interprets the phrase "monitoring" to mean air monitoring
20 performed by SoCalGas or at its direction intended to detect emissions of natural gas (and its
21 components).

22 **TOPIC NO. 21:**

23 SoCalGas' OPERATING STANDARDS concerning operational tolerances, including but
24 not limited [*sic*], gas volume, pressure, and makeup as well as their impact on operation of the
25 FACILITY from January 1, 1978 to December 31, 2003.

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1 **RESPONSE TO TOPIC NO. 21:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the terms "OPERATIONAL STANDARDS" and "FACILITY," as
5 well as the undefined terms "operational tolerances," "makeup" and "impact on operation," as
6 vague and ambiguous.

7 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
8 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 SoCalGas objects to this Topic to the extent it seeks information that is protected by
11 privilege, including but not limited to information protected by the attorney-client privilege, the
12 attorney work product doctrine and any other applicable privilege or protection.

13 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
14 private information.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
17 agreeable time and location, and subject to further meet and confer, to provide non-privileged
18 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
19 procedures governing the range of operating gas volume and pressure for the Aliso Canyon
20 storage reservoir, maximum and minimum operating pressures for underground gas storage wells
21 at Aliso Canyon, and the performance of gas composition analyses of natural gas stored at the
22 Aliso Canyon facility.

23 **TOPIC NO. 22:**

24 SoCalGas' OPERATING STANDARDS concerning operational tolerances, including but
25 not limited [*sic*], gas volume, pressure, and makeup as well as their impact on operation of the
26 FACILITY from January 1, 2004 to the present.

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1 **RESPONSE TO TOPIC NO. 22:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the terms "OPERATIONAL STANDARDS" and "FACILITY," as
5 well as the undefined terms "operational tolerances," "makeup" and "impact on operation," as
6 vague and ambiguous.

7 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
8 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 SoCalGas objects to this Topic to the extent it seeks information that is protected by
11 privilege, including but not limited to information protected by the attorney-client privilege, the
12 attorney work product doctrine and any other applicable privilege or protection.

13 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
14 private information.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
17 agreeable time and location, and subject to further meet and confer, to provide non-privileged
18 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
19 procedures governing the range of operating gas volume and pressure for the Aliso Canyon
20 storage reservoir, maximum and minimum operating pressures for underground gas storage wells
21 at Aliso Canyon, and the performance of gas composition analyses of natural gas stored at the
22 Aliso Canyon facility.

23 **TOPIC NO. 23:**

24 SoCalGas' OPERATING STANDARDS for assessing and or monitoring reservoir
25 formation integrity at the FACILITY, from January 1, 1978 to December 31, 2003.

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1 **RESPONSE TO TOPIC NO. 23:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
5 as the undefined terms "assessing," "monitoring," and "reservoir formation integrity," as vague
6 and ambiguous.

7 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
8 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 SoCalGas objects to this Topic to the extent it seeks information that is protected by
11 privilege, including but not limited to information protected by the attorney-client privilege, the
12 attorney work product doctrine and any other applicable privilege or protection.

13 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
14 private information.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
17 agreeable time and location, and subject to further meet and confer, to provide non-privileged
18 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
19 procedures governing assessing and monitoring the structural integrity of the natural gas storage
20 reservoir at the Aliso Canyon Facility.

21 **TOPIC NO. 24:**

22 SoCalGas' OPERATING STANDARDS for assessing and or monitoring reservoir
23 formation integrity at the FACILITY, from January 1, 2004 to the present.

24 **RESPONSE TO TOPIC NO. 24:**

25 SoCalGas reasserts and incorporates each of the General Objections and Specific
26 Objections to Definitions as set forth above.

27 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY," as well
28 as the undefined terms "assessing," "monitoring," and "reservoir formation integrity," as vague

1 and ambiguous.

2 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
3 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
4 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

5 SoCalGas objects to this Topic to the extent it seeks information that is protected by
6 privilege, including but not limited to information protected by the attorney-client privilege, the
7 attorney work product doctrine and any other applicable privilege or protection.

8 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
9 private information.

10 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
11 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
12 agreeable time and location, and subject to further meet and confer, to provide non-privileged
13 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
14 procedures governing assessing and monitoring the structural integrity of the natural gas storage
15 reservoir at the Aliso Canyon Facility.

16 **TOPIC NO. 25:**

17 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
18 rules or regulations issued by the California Department of Conservation, Division of Oil, Gas,
19 and Geothermal Resources, from January 1, 1978 to December 31, 2003.

20 **RESPONSE TO TOPIC NO. 25:**

21 SoCalGas reasserts and incorporates each of the General Objections and Specific
22 Objections to Definitions as set forth above.

23 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY'S," as
24 well as the undefined terms "compliance" and "rules or regulations," as vague and ambiguous.
25 SoCalGas interprets this Topic to include only those rules or regulations issued by the California
26 Department of Conservation, Division of Oil, Gas, and Geothermal Resources that govern the
27 inspection, operation and maintenance of underground gas storage wells at the Aliso Canyon
28 facility.

1 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
2 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
3 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

4 SoCalGas objects to this Topic to the extent it seeks information that is protected by
5 privilege, including but not limited to information protected by the attorney-client privilege, the
6 attorney work product doctrine and any other applicable privilege or protection.

7 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
8 private information.

9 SoCalGas objects to this Topic to the extent it calls for a legal conclusion.

10 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
11 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
12 agreeable time and location, and subject to further meet and confer, to provide non-privileged
13 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
14 procedures governing compliance with rules and regulations issued by the California Department
15 of Conservation, Division of Oil, Gas, and Geothermal Resources that govern the inspection,
16 operation and maintenance of underground gas storage wells at the Aliso Canyon facility.

17 **TOPIC NO. 26:**

18 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
19 rules or regulations issued by the California Department of Conservation, Division of Oil, Gas,
20 and Geothermal Resources, from January 2, 2004 to the present.

21 **RESPONSE TO TOPIC NO. 26:**

22 SoCalGas reasserts and incorporates each of the General Objections and Specific
23 Objections to Definitions as set forth above.

24 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY'S," as
25 well as the undefined terms "compliance" and "rules or regulations," as vague and ambiguous.
26 SoCalGas interprets this Topic to include only those rules or regulations issued by the California
27 Department of Conservation, Division of Oil, Gas, and Geothermal Resources that govern the
28 inspection, operation and maintenance of underground gas storage wells at the Aliso Canyon

1 facility.

2 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
3 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
4 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

5 SoCalGas objects to this Topic to the extent it seeks information that is protected by
6 privilege, including but not limited to information protected by the attorney-client privilege, the
7 attorney work product doctrine and any other applicable privilege or protection.

8 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
9 private information.

10 SoCalGas objects to this Topic to the extent it calls for a legal conclusion.

11 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
12 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
13 agreeable time and location, and subject to further meet and confer, to provide non-privileged
14 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
15 procedures governing compliance with rules and regulations issued by the California Department
16 of Conservation, Division of Oil, Gas, and Geothermal Resources that govern the inspection,
17 operation and maintenance of underground gas storage wells at the Aliso Canyon facility.

18 **TOPIC NO. 27:**

19 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
20 rules or regulations issued by the California Public Utilities Commission from January 1, 1978 to
21 December 31, 2003.

22 **RESPONSE TO TOPIC NO. 27:**

23 SoCalGas reasserts and incorporates each of the General Objections and Specific
24 Objections to Definitions as set forth above.

25 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY'S," as
26 well as the undefined terms "compliance" and "rules or regulations," as vague and ambiguous.

27 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
28 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this

1 litigation nor reasonably calculated to lead to the discovery of admissible evidence. SoCalGas
2 interprets this Topic to include only those rules or regulations, if any, issued by the California
3 Public Utilities Commission that govern the inspection, operation and maintenance of
4 underground gas storage wells at the Aliso Canyon facility, to the extent not otherwise delegated
5 to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources,
6 and to exclude all other rules and regulations issued by the California Public Utilities
7 Commission that govern utilities generally and/or other aspects of the transmission, storage
8 and/or distribution of natural gas by SoCalGas not directly related to underground storage
9 operations at the Aliso Canyon facility.

10 SoCalGas objects to this Topic to the extent it seeks information that is protected by
11 privilege, including but not limited to information protected by the attorney-client privilege, the
12 attorney work product doctrine and any other applicable privilege or protection.

13 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
14 private information.

15 SoCalGas objects to this Topic to the extent it calls for a legal conclusion.

16 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
17 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
18 agreeable time and location, and subject to further meet and confer, to provide non-privileged
19 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
20 procedures governing compliance with rules and regulations, if any, issued by the California
21 Public Utilities Commission that govern the inspection, operation and maintenance of
22 underground gas storage wells at the Aliso Canyon facility to the extent not otherwise delegated
23 to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.
24 To the extent the scope of Topic No. 27 is intended to encompass additional rules and regulations
25 and/or rules and regulations governing any other aspect of SoCalGas' operations or business
26 unrelated to underground storage at the Aliso Canyon facility, it is so vague and overbroad that
27 SoCalGas is not able to produce a witness in response to this Topic.
28

1 **TOPIC NO. 28:**

2 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
3 rules or regulations issued by the California Public Utilities Commission from January 1, 2004 to
4 the present.

5 **RESPONSE TO TOPIC NO. 28:**

6 SoCalGas reasserts and incorporates each of the General Objections and Specific
7 Objections to Definitions as set forth above.

8 SoCalGas objects to the terms "OPERATING STANDARDS" and "FACILITY'S," as
9 well as the undefined terms "compliance" and "rules or regulations," as vague and ambiguous.

10 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
11 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
12 litigation nor reasonably calculated to lead to the discovery of admissible evidence. SoCalGas
13 interprets this Topic to include only those rules or regulations, if any, issued by the California
14 Public Utilities Commission that govern the inspection, operation and maintenance of
15 underground gas storage wells at the Aliso Canyon facility, to the extent not otherwise delegated
16 to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources,
17 and to exclude all other rules and regulations issued by the California Public Utilities
18 Commission that govern utilities generally and/or other aspects of the transmission, storage
19 and/or distribution of natural gas by SoCalGas not directly related to underground storage
20 operations at the Aliso Canyon facility.

21 SoCalGas objects to this Topic to the extent it seeks information that is protected by
22 privilege, including but not limited to information protected by the attorney-client privilege, the
23 attorney work product doctrine and any other applicable privilege or protection.

24 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
25 private information.

26 SoCalGas objects to this Topic to the extent it calls for a legal conclusion.

27 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
28 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-

1 agreeable time and location, and subject to further meet and confer, to provide non-privileged
2 testimony, to the extent not previously provided, regarding the following: SoCalGas' policies and
3 procedures governing compliance with rules and regulations, if any, issued by the California
4 Public Utilities Commission that govern the inspection, operation and maintenance of
5 underground gas storage wells at the Aliso Canyon facility to the extent not otherwise delegated
6 to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.
7 To the extent the scope of Topic No. 28 is intended to encompass additional rules and regulations
8 and/or rules and regulations governing any other aspect of SoCalGas' operations or business
9 unrelated to underground storage at the Aliso Canyon facility, it is so vague and overbroad that
10 SoCalGas is not able to produce a witness in response to this Topic.

11 **TOPIC NO. 29:**

12 SoCalGas' financial planning, budgeting, and cost projections as to the operation,
13 maintenance, repair, inspection, monitoring, and testing of underground storage wells at the
14 FACILITY from January 1, 2004 to the present.

15 **RESPONSE TO TOPIC NO. 29:**

16 SoCalGas reasserts and incorporates each of the General Objections and Specific
17 Objections to Definitions as set forth above.

18 SoCalGas objects to the term "FACILITY," as well as the undefined terms "financial
19 planning," "budgeting," "cost projections," "operation," "maintenance," "repair," "inspection,"
20 "monitoring," "testing" and "underground storage wells," as vague and ambiguous.

21 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
22 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
23 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

24 SoCalGas objects to this Topic to the extent it seeks information that is protected by
25 privilege, including but not limited to information protected by the attorney-client privilege, the
26 attorney work product doctrine and any other applicable privilege or protection.

27 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
28 private information.

1 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
2 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
3 agreeable time and location, and subject to further meet and confer, to provide non-privileged
4 testimony, to the extent not previously provided, regarding the following: SoCalGas' budgets and
5 cost projections for the operation, maintenance, repair, inspection, monitoring and testing of
6 underground gas storage wells at the Aliso Canyon facility.

7 **TOPIC NO. 30:**

8 SoCalGas' financial planning, budgeting, and cost projections as to capital planning for
9 underground storage wells at the FACILITY from January 1, 2004 to the present.

10 **RESPONSE TO TOPIC NO. 30:**

11 SoCalGas reasserts and incorporates each of the General Objections and Specific
12 Objections to Definitions as set forth above.

13 SoCalGas objects to the term "FACILITY," as well as the undefined terms "financial
14 planning," "budgeting," "cost projections," "capital planning," and "underground storage wells,"
15 as vague and ambiguous.

16 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
17 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
18 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

19 SoCalGas objects to this Topic to the extent it seeks information that is protected by
20 privilege, including but not limited to information protected by the attorney-client privilege, the
21 attorney work product doctrine and any other applicable privilege or protection.

22 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
23 private information.

24 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
25 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
26 agreeable time and location, and subject to further meet and confer, to provide non-privileged
27 testimony, to the extent not previously provided, regarding the following: SoCalGas' budgets and
28 long-term cost projections as to large capital expenditures at the Aliso Canyon facility.

1 **TOPIC NO. 31:**

2 SoCalGas' safety-related committees, including the roles, responsibilities, chain(s) of
3 command, and personnel assigned to such committees, from January 1, 2004 to the present.

4 **RESPONSE TO TOPIC NO. 31:**

5 SoCalGas reasserts and incorporates each of the General Objections and Specific
6 Objections to Definitions as set forth above.

7 SoCalGas objects to the undefined terms "safety-related committees," "roles,"
8 "responsibilities," "chain(s) of command" and "personnel," as vague and ambiguous.

9 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
10 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
11 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

12 SoCalGas objects to this Topic to the extent it seeks information that is protected by
13 privilege, including but not limited to information protected by the attorney-client privilege, the
14 attorney work product doctrine and any other applicable privilege or protection.

15 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
16 private information.

17 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
18 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
19 agreeable time and location, and subject to further meet and confer, to provide non-privileged
20 testimony, to the extent not previously provided, regarding the following: SoCalGas' Storage
21 Safety Committee during the requested time period.

22 **TOPIC NO. 32:**

23 SoCalGas' audit-related committees, including the roles, responsibilities, chain(s) of
24 command, and personnel assigned to such committees, from January 1, 2004 to the present.

25 **RESPONSE TO TOPIC NO. 32:**

26 SoCalGas reasserts and incorporates each of the General Objections and Specific
27 Objections to Definitions as set forth above.

28 SoCalGas objects to the undefined terms "audit-related committees," "roles,"

1 “responsibilities,” “chain(s) of command” and “personnel,” as vague and ambiguous.

2 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
3 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
4 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

5 SoCalGas objects to this Topic to the extent it seeks information that is protected by
6 privilege, including but not limited to information protected by the attorney-client privilege, the
7 attorney work product doctrine and any other applicable privilege or protection.

8 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
9 private information.

10 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
11 SoCalGas does not have and has not had over the requested time period any committees
12 specifically constituted to conduct audits of or relating to the Aliso Canyon facility and, as such,
13 will not produce a witness on this Topic.

14 **TOPIC NO. 33:**

15 SEMPRA's oversight of and involvement in day-to-day decisions pertaining to
16 underground storage wells at the FACILITY from January 1, 2004 to the present.

17 **RESPONSE TO TOPIC NO. 33:**

18 SoCalGas reasserts and incorporates each of the General Objections and Specific
19 Objections to Definitions as set forth above.

20 SoCalGas objects to the term “FACILITY,” as well as the undefined terms “oversight,”
21 “involvement,” “day-to-day decisions,” “pertaining to” and “underground storage wells,” as
22 vague and ambiguous.

23 SoCalGas objects to this Topic to the extent it is overbroad as to time and scope, unduly
24 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
25 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 SoCalGas objects to this Topic to the extent it seeks information that is protected by
27 privilege, including but not limited to information protected by the attorney-client privilege, the
28 attorney work product doctrine and any other applicable privilege or protection.

1 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
2 private information.

3 SoCalGas objects to this Topic to the extent it seeks to require it to respond on behalf of
4 any entity other than SoCalGas.

5 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

6 SoCalGas objects that it is a separate entity from Sempra and is not in possession, custody
7 or control of information regarding information in the possession, custody or control of Sempra.

8 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
9 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
10 agreeable time and location, and subject to further meet and confer, to provide non-privileged
11 testimony, to the extent not previously provided, regarding SoCalGas' knowledge of the
12 identified Topic.

13 **TOPIC NO. 34:**

14 SoCalGas' response to the INCIDENT, including but not limited to, detection of the
15 release, stopping the release, repair of SS-25, and any/or other actions taken by SoCalGas at the
16 FACILITY in response to and/or as a result of the INCIDENT.

17 **RESPONSE TO TOPIC NO. 34:**

18 SoCalGas reasserts and incorporates each of the General Objections and Specific
19 Objections to Definitions as set forth above.

20 SoCalGas objects to the terms "INCIDENT" and "FACILITY," as well as the undefined
21 terms "response," "detection of the release," "stopping the release," "repair," "actions" and "in
22 response to and/or as a result of the INCIDENT," as vague and ambiguous.

23 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
24 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
25 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 SoCalGas objects to this Topic to the extent it seeks information that is protected by
27 privilege, including but not limited to information protected by the attorney-client privilege, the
28 attorney work product doctrine and any other applicable privilege or protection.

1 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
2 private information.

3 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
4 information which is publicly available or otherwise equally available to the Plaintiffs as to
5 SoCalGas.

6 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
7 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
8 agreeable time and location, and subject to further meet and confer, to provide non-privileged
9 testimony, to the extent not previously provided, regarding the following: SoCalGas' response to
10 the SS-25 incident. Consistent with the objections stated herein and for purposes of clarifying the
11 scope of the Topic on which the witness or witnesses will be prepared to testify, SoCalGas
12 interprets the phrase "response to the SS-25 incident" to mean and encompass discovery of the
13 leak on October 23, 2015, the actions taken upon discovery of the leak, attempts to kill or
14 otherwise stop the leak, the relief well, the stopping of the leak as confirmed on February 18,
15 2016, and the Incident Command Team structure and personnel related to the leak.

16 **TOPIC NO. 35:**

17 SEMPRA's response to the INCIDENT, including but not limited to, detection of the
18 release, stopping the release, repair of SS-25, and any/or other actions taken by SEMPRA at the
19 FACILITY in response to and/or as a result of the INCIDENT.

20 **RESPONSE TO TOPIC NO. 35:**

21 SoCalGas reasserts and incorporates each of the General Objections and Specific
22 Objections to Definitions as set forth above.

23 SoCalGas objects to the terms "INCIDENT" and "FACILITY," as well as the undefined
24 terms "response," "detection of the release," "stopping the release," "repair," "actions" and "in
25 response to and/or as a result of the INCIDENT," as vague and ambiguous.

26 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
27 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
28 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

1 SoCalGas objects to this Topic to the extent it seeks information that is protected by
2 privilege, including but not limited to information protected by the attorney-client privilege, the
3 attorney work product doctrine and any other applicable privilege or protection.

4 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
5 private information.

6 SoCalGas objects to this Topic to the extent it seeks to require it to respond on behalf of
7 any entity other than SoCalGas.

8 SoCalGas objects that it is a separate entity from Sempra and is not in possession, custody
9 or control of information regarding information in the possession, custody or control of Sempra.

10 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
11 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
12 agreeable time and location, and subject to further meet and confer, to provide non-privileged
13 testimony, to the extent not previously provided, regarding SoCalGas' knowledge concerning
14 Sempra's response to the SS-25 incident. Consistent with the objections stated herein and for
15 purposes of clarifying the scope of the Topic on which the witness or witnesses will be prepared
16 to testify, SoCalGas interprets the phrase "response to the SS-25 incident" to mean and
17 encompass discovery of the leak on October 23, 2015, the actions taken upon discovery of the
18 leak, attempts to kill or otherwise stop the leak, the relief well, the stopping of the leak as
19 confirmed on February 18, 2016, and the Incident Command Team structure and personnel
20 related to the leak.

21 **TOPIC NO. 36:**

22 The contents of the gas stored at the FACILITY the week before the INCIDENT,
23 including but not limited to, the constituents and/or components of the gas, quantities of each
24 constituent, and total quantities.

25 **RESPONSE TO TOPIC NO. 36:**

26 SoCalGas reasserts and incorporates each of the General Objections and Specific
27 Objections to Definitions as set forth above.

28 SoCalGas objects to the terms "INCIDENT" and "FACILITY," as well as the undefined

1 terms "contents," "stored at the FACILITY," "constituents," "components," "quantities" and
2 "total quantities," as vague and ambiguous.

3 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
4 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
5 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

6 SoCalGas objects to this Topic to the extent it seeks information that is protected by
7 privilege, including but not limited to information protected by the attorney-client privilege, the
8 attorney work product doctrine and any other applicable privilege or protection.

9 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
10 private information.

11 SoCalGas objects to this Topic to the extent it seeks to require it to respond on behalf of
12 any entity other than SoCalGas.

13 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
14 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
15 agreeable time and location, and subject to further meet and confer, to provide non-privileged
16 testimony, to the extent not previously provided, regarding the following: Gas Composition
17 Analyses conducted on the natural gas stored in the reservoir at the Aliso Canyon facility nearest
18 in time to October 23, 2015.

19 **TOPIC NO. 37:**

20 The contents of the gas stored at the FACILITY during the five (5) years prior to the
21 INCIDENT, including but not limited to, the constituents and/or components of the gas,
22 quantities of each constituent, and total quantities.

23 **RESPONSE TO TOPIC NO. 37:**

24 SoCalGas reasserts and incorporates each of the General Objections and Specific
25 Objections to Definitions as set forth above.

26 SoCalGas objects to the terms "INCIDENT" and "FACILITY," as well as the undefined
27 terms "contents," "stored at the FACILITY," "constituents," "components," "quantities" and
28 "total quantities," as vague and ambiguous.

1 SoCalGas objects to this Topic to the extent it is duplicative, overbroad as to time and
2 scope, unduly burdensome, harassing, and seeks information that is neither relevant to the subject
3 matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

4 SoCalGas objects to this Topic to the extent it seeks information that is protected by
5 privilege, including but not limited to information protected by the attorney-client privilege, the
6 attorney work product doctrine and any other applicable privilege or protection.

7 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
8 private information.

9 SoCalGas objects to this Topic to the extent it seeks to require it to respond on behalf of
10 any entity other than SoCalGas.

11 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
12 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
13 agreeable time and location, and subject to further meet and confer, to provide non-privileged
14 testimony, to the extent not previously provided, regarding the following: Gas Composition
15 Analyses conducted on the natural gas stored in the reservoir at the Aliso Canyon facility during
16 the requested time period.

17 **TOPIC NO. 38:**

18 SoCalGas' air monitoring, emissions testing, air sampling, and/or any quantification of
19 released gas and other constituents as a result of the INCIDENT.

20 **RESPONSE TO TOPIC NO. 38:**

21 SoCalGas reasserts and incorporates each of the General Objections and Specific
22 Objections to Definitions as set forth above.

23 SoCalGas objects to the term "INCIDENT," as well as the undefined terms "air
24 monitoring," "emissions testing," "air sampling," "quantification," "released gas," "constituents"
25 and "as a result of the INCIDENT," as vague and ambiguous.

26 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
27 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
28 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

1 SoCalGas objects to this Topic to the extent it seeks information that is protected by
2 privilege, including but not limited to information protected by the attorney-client privilege, the
3 attorney work product doctrine and any other applicable privilege or protection.

4 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
5 private information.

6 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
7 information which is publicly available or otherwise equally available to the Plaintiffs as to
8 SoCalGas.

9 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

10 SoCalGas objects to this Topic to the extent it calls for expert opinion.

11 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
12 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
13 agreeable time and location, and subject to further meet and confer, to provide non-privileged
14 testimony, to the extent not previously provided, regarding the following: air testing or sampling
15 conducted by or on behalf of SoCalGas on the Aliso Canyon property, the property boundary, and
16 at offsite locations between October 23, 2015, and July 22, 2016, and the results of efforts to
17 quantify the amount of natural gas released in connection with the SS-25 incident from
18 October 23, 2015 to February 11, 2016, that were provided to the California Public Utilities
19 Commission in June 2016. SoCalGas does not interpret this Topic to include interpretation of the
20 results or evaluation of testing procedures and methodologies employed by third parties.

21 **TOPIC NO. 39:**

22 SoCalGas's knowledge about health effects and/or potential harm to human health that
23 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents
24 from Well SS-25 and/or any other wells at Aliso Canyon prior to and up to the date of the
25 INCIDENT.

26 ///

27 ///

28 ///

1 **RESPONSE TO TOPIC NO. 39:**

2 SoCalGas reasserts and incorporates each of the General Objections and Specific
3 Objections to Definitions as set forth above.

4 SoCalGas objects to the term "INCIDENT," as well as the undefined terms "health
5 effects," "potential harm to human health," "posed by," "related to," "emissions," "gas and/or
6 other chemicals, material, or constituents," and "any other wells," as vague and ambiguous.

7 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
8 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
9 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 SoCalGas objects to this Topic to the extent it seeks information that is protected by
11 privilege, including but not limited to information protected by the attorney-client privilege, the
12 attorney work product doctrine and any other applicable privilege or protection.

13 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
14 private information.

15 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

16 SoCalGas objects to this Topic to the extent it calls for expert opinion.

17 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
18 information which is publicly available or otherwise equally available to the Plaintiffs as to
19 SoCalGas.

20 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
21 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
22 agreeable time and location, and subject to further meet and confer, to provide non-privileged
23 testimony, to the extent not previously provided, regarding the following: SoCalGas' knowledge
24 as of October 23, 2015, regarding any health effects related to a release of natural gas from gas
25 storage wells at the Aliso Canyon facility.

26 **TOPIC NO. 40:**

27 SoCalGas's knowledge about health effects and/or potential harm to human health that
28 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents

1 from Well SS-25 and/or any other wells at Aliso Canyon from the date of the INCIDENT to the
2 present.

3 **RESPONSE TO TOPIC NO. 40:**

4 SoCalGas reasserts and incorporates each of the General Objections and Specific
5 Objections to Definitions as set forth above.

6 SoCalGas objects to the term "INCIDENT," as well as the undefined terms "health
7 effects," "potential harm to human health," "posed by," "related to," "emissions," "gas and/or
8 other chemicals, material, or constituents," and "any other wells," as vague and ambiguous.

9 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
10 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
11 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

12 SoCalGas objects to this Topic to the extent it seeks information that is protected by
13 privilege, including but not limited to information protected by the attorney-client privilege, the
14 attorney work product doctrine and any other applicable privilege or protection.

15 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
16 private information.

17 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

18 SoCalGas objects to this Topic to the extent it calls for expert opinion.

19 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
20 information which is publicly available or otherwise equally available to the Plaintiffs as to
21 SoCalGas.

22 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
23 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
24 agreeable time and location, and subject to further meet and confer, to provide non-privileged
25 testimony, to the extent not previously provided, regarding the following: SoCalGas' public
26 statements regarding potential health effects, if any, in connection with the release of natural gas
27 from the SS-25 incident.
28

1 **TOPIC NO. 41:**

2 SoCalGas's knowledge about and responses to complaints, notices, notifications, orders,
3 warnings, correspondence and/or information (other than by litigation consultants and/or expert
4 witnesses) relating to health risks and/or potential harm to human health posed by the
5 INCIDENT.

6 **RESPONSE TO TOPIC NO. 41:**

7 SoCalGas reasserts and incorporates each of the General Objections and Specific
8 Objections to Definitions as set forth above.

9 SoCalGas objects to the term "INCIDENT," as well as the undefined terms "knowledge
10 about," "responses to," "complaints, notices, notifications, orders, warnings, correspondence
11 and/or information," "relating to," "health risks," "potential harm to human health" and "posed by
12 the INCIDENT" as vague and ambiguous.

13 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
14 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
15 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 SoCalGas objects to this Topic to the extent it seeks information that is protected by
17 privilege, including but not limited to information protected by the attorney-client privilege, the
18 attorney work product doctrine and any other applicable privilege or protection.

19 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
20 private information.

21 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

22 SoCalGas objects to this Topic to the extent it calls for expert opinion.

23 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
24 information which is publicly available or otherwise equally available to the Plaintiffs as to
25 SoCalGas.

26 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
27 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
28 agreeable time and location, and subject to further meet and confer, to provide non-privileged

1 testimony, to the extent not previously provided, regarding the following: SoCalGas' knowledge
2 of complaints it received from members of the community regarding the SS-25 incident.

3 **TOPIC NO. 42:**

4 SoCalGas's knowledge about health effects and/or potential harm to human health that
5 would be impacted by the "killing" of Well SS-25 in February 2016 and continuing to the present.

6 **RESPONSE TO TOPIC NO. 42:**

7 SoCalGas reasserts and incorporates each of the General Objections and Specific
8 Objections to Definitions as set forth above.

9 SoCalGas objects to the undefined terms "knowledge about," "health effects," "potential
10 harm to human health," and "impacted by" as vague and ambiguous.

11 SoCalGas objects to the phrase "the 'killing' of Well SS-25 in February 2016" as vague
12 and ambiguous and not reasonably particular as to the scope of the topic.

13 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
14 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
15 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 SoCalGas objects to this Topic to the extent it seeks information that is protected by
17 privilege, including but not limited to information protected by the attorney-client privilege, the
18 attorney work product doctrine and any other applicable privilege or protection.

19 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
20 private information.

21 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

22 SoCalGas objects to this Topic to the extent it calls for expert opinion.

23 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
24 information which is publicly available or otherwise equally available to the Plaintiffs as to
25 SoCalGas.

26 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
27 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
28 agreeable time and location, and subject to further meet and confer, to provide non-privileged

1 testimony, to the extent not previously provided, regarding the following: SoCalGas' knowledge
2 regarding potential health effects, if any and if known, associated with stopping the well SS-25
3 leak in February 2016.

4 **TOPIC NO. 43:**

5 SoCalGas's knowledge about property damage and/or potential harm to property that
6 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents
7 from Well SS-25 and/or any other wells at Aliso Canyon prior to and up to the date of the
8 INCIDENT.

9 **RESPONSE TO TOPIC NO. 43:**

10 SoCalGas reasserts and incorporates each of the General Objections and Specific
11 Objections to Definitions as set forth above.

12 SoCalGas objects to the term "INCIDENT," as well as the undefined terms "knowledge
13 about," "property damage," "potential harm to property," "posed by," "related to," "emissions,"
14 "gas and/or other chemicals, material, or constituents," and "any other wells," as vague and
15 ambiguous.

16 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
17 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
18 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

19 SoCalGas objects to this Topic to the extent it seeks information that is protected by
20 privilege, including but not limited to information protected by the attorney-client privilege, the
21 attorney work product doctrine and any other applicable privilege or protection.

22 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
23 private information.

24 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

25 SoCalGas objects to this Topic to the extent it calls for expert opinion.

26 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
27 information which is publicly available or otherwise equally available to the Plaintiffs as to
28 SoCalGas.

1 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
2 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
3 agreeable time and location, and subject to further meet and confer, to provide non-privileged
4 testimony, to the extent not previously provided, regarding the following: SoCalGas' knowledge
5 regarding potential damage to property, if any, from emissions of natural gas from underground
6 storage wells at the Aliso Canyon facility in the five years prior to October 23, 2015.

7 **TOPIC NO. 44:**

8 SoCalGas's knowledge about property damage and/or potential harm to property that
9 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents
10 from Well SS-25 and/or any other wells at Aliso Canyon from the date of the INCIDENT to the
11 present.

12 **RESPONSE TO TOPIC NO. 44:**

13 SoCalGas reasserts and incorporates each of the General Objections and Specific
14 Objections to Definitions as set forth above.

15 SoCalGas objects to the undefined terms "knowledge about," "property damage,"
16 "potential harm to property," "posed by," "related to," "emissions," "gas and/or other chemicals,
17 material, or constituents," and "any other wells," as vague and ambiguous.

18 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
19 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
20 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

21 SoCalGas objects to this Topic to the extent it seeks information that is protected by
22 privilege, including but not limited to information protected by the attorney-client privilege, the
23 attorney work product doctrine and any other applicable privilege or protection.

24 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
25 private information.

26 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

27 SoCalGas objects to this Topic to the extent it calls for expert opinion.

28 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide

1 information which is publicly available or otherwise equally available to the Plaintiffs as to
2 SoCalGas.

3 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
4 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
5 agreeable time and location, and subject to further meet and confer, to provide non-privileged
6 testimony, to the extent not previously provided, regarding the following: SoCalGas' exterior
7 residential cleaning program, automobile cleaning and the cleaning of various community parks
8 between approximately December 2015 and June 2016.

9 **TOPIC NO. 45:**

10 SoCalGas's knowledge about and responses to complaints, notices, notifications, orders,
11 warnings, correspondence and/or information (other than by litigation consultants and/or expert
12 witnesses) relating to property damage and/or potential harm to property posed by the
13 INCIDENT.

14 **RESPONSE TO TOPIC NO. 45:**

15 SoCalGas reasserts and incorporates each of the General Objections and Specific
16 Objections to Definitions as set forth above.

17 SoCalGas objects to the term "INCIDENT," as well as the undefined terms "knowledge
18 about," "responses to," "complaints, notices, notifications, orders, warnings, correspondence
19 and/or information," "relating to," "property damage," "potential harm to property," and "posed
20 by the INCIDENT," as vague and ambiguous.

21 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
22 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
23 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

24 SoCalGas objects to this Topic to the extent it seeks information that is protected by
25 privilege, including but not limited to information protected by the attorney-client privilege, the
26 attorney work product doctrine and any other applicable privilege or protection.

27 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
28 private information.

1 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

2 SoCalGas objects to this Topic to the extent it calls for expert opinion.

3 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
4 information which is publicly available or otherwise equally available to the Plaintiffs as to
5 SoCalGas.

6 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
7 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
8 agreeable time and location, and subject to further meet and confer, to provide non-privileged
9 testimony, to the extent not previously provided, regarding the following: SoCalGas' knowledge
10 of complaints it received from members of the community regarding alleged property damage
11 related to the SS-25 incident.

12 **TOPIC NO. 46:**

13 SoCalGas's knowledge about property damage and/or potential harm to property that
14 would be impacted by the "killing" of Well SS-25 in February 2016 and continuing to the present.

15 **RESPONSE TO TOPIC NO. 46:**

16 SoCalGas reasserts and incorporates each of the General Objections and Specific
17 Objections to Definitions as set forth above.

18 SoCalGas objects to the undefined terms "knowledge about," "property damage,"
19 "potential harm to property," and "impacted by," as vague and ambiguous.

20 SoCalGas objects to the phrase "the 'killing' of Well SS-25 in February 2016" as vague
21 and ambiguous and not reasonably particular as to the scope of the topic.

22 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
23 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
24 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

25 SoCalGas objects to this Topic to the extent it seeks information that is protected by
26 privilege, including but not limited to information protected by the attorney-client privilege, the
27 attorney work product doctrine and any other applicable privilege or protection.

28 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or

1 private information.

2 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

3 SoCalGas objects to this Topic to the extent it calls for expert opinion.

4 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
5 information which is publicly available or otherwise equally available to the Plaintiffs as to
6 SoCalGas.

7 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
8 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
9 agreeable time and location, and subject to further meet and confer, to provide non-privileged
10 testimony, to the extent not previously provided, regarding the following: SoCalGas' knowledge
11 of actual or potential impacts to property, if any and if known, associated with stopping the well
12 SS-25 leak in February 2016.

13 **TOPIC NO. 47:**

14 SoCalGas' implementation, funding of, and reimbursement associated with the Temporary
15 Relocation Program.

16 **RESPONSE TO TOPIC NO. 47:**

17 SoCalGas reasserts and incorporates each of the General Objections and Specific
18 Objections to Definitions as set forth above.

19 SoCalGas objects to the undefined terms "implementation," "funding of,"
20 "reimbursement," "associated with," and "Temporary Relocation Program," as vague and
21 ambiguous.

22 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
23 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
24 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

25 SoCalGas objects to this Topic to the extent it seeks information that is protected by
26 privilege, including but not limited to information protected by the attorney-client privilege, the
27 attorney work product doctrine and any other applicable privilege or protection.

28 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or

1 private information.

2 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
3 information which is publicly available or otherwise equally available to the Plaintiffs as to
4 SoCalGas.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
7 agreeable time and location, and subject to further meet and confer, to provide non-privileged
8 testimony, to the extent not previously provided, regarding the Temporary Relocation Plan issued
9 on December 24, 2015, its implementation, the reimbursement process, and the total amounts
10 disbursed as reimbursement for claims submitted under the Temporary Relocation Plan.

11 **TOPIC NO. 48:**

12 Post-INCIDENT leaks or releases at or from the FACILITY and causes thereof.

13 **RESPONSE TO TOPIC NO. 48:**

14 SoCalGas reasserts and incorporates each of the General Objections and Specific
15 Objections to Definitions as set forth above.

16 SoCalGas objects to the terms "INCIDENT" and "FACILITY," as well as the undefined
17 terms "leaks or releases at or from the FACILITY" and "causes thereof," as vague and
18 ambiguous.

19 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
20 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
21 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 SoCalGas objects to this Topic to the extent it seeks information that is protected by
23 privilege, including but not limited to information protected by the attorney-client privilege, the
24 attorney work product doctrine and any other applicable privilege or protection.

25 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
26 private information.

27 SoCalGas objects to this Topic to the extent it seeks to require it to respond on behalf of
28 any entity other than SoCalGas.

1 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

2 SoCalGas objects to this Topic to the extent it seeks to require SoCalGas to provide
3 information which is publicly available or otherwise equally available to the Plaintiffs as to
4 SoCalGas.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
7 agreeable time and location, and subject to further meet and confer, to provide non-privileged
8 testimony, to the extent not previously provided, regarding the following: leaks that occurred after
9 February 18, 2016, if any. Consistent with the objections stated herein and for purposes of
10 clarifying the scope of the Topic on which the witness or witnesses will be prepared to testify,
11 SoCalGas interprets the term “leaks” to mean unexpected and uncontrolled significant or
12 persistent leaks of natural gas from an underground storage well to the outside environment.

13 **TOPIC NO. 49:**

14 SoCalGas's response to post-INCIDENT leaks or releases at or from the FACILITY.

15 **RESPONSE TO TOPIC NO. 49:**

16 SoCalGas reasserts and incorporates each of the General Objections and Specific
17 Objections to Definitions as set forth above.

18 SoCalGas objects to the terms “INCIDENT” and “FACILITY,” as well as the undefined
19 terms “response” and “leaks or releases at or from the FACILITY,” as vague and ambiguous.

20 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
21 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
22 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

23 SoCalGas objects to this Topic to the extent it seeks information that is protected by
24 privilege, including but not limited to information protected by the attorney-client privilege, the
25 attorney work product doctrine and any other applicable privilege or protection.

26 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
27 private information.

28 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

1 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
2 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
3 agreeable time and location, and subject to further meet and confer, to provide non-privileged
4 testimony, to the extent not previously provided, regarding the following: SoCalGas' response to
5 leaks that occurred after February 18, 2016, if any. Consistent with the objections stated herein
6 and for purposes of clarifying the scope of the Topic on which the witness or witnesses will be
7 prepared to testify, SoCalGas interprets the term "leaks" to mean unexpected and uncontrolled
8 significant or persistent leaks of natural gas from an underground storage well to the outside
9 environment.

10 **TOPIC NO. 50:**

11 SEMPRA's response to post-INCIDENT leaks or releases at or from the FACILITY.

12 **RESPONSE TO TOPIC NO. 50:**

13 SoCalGas reasserts and incorporates each of the General Objections and Specific
14 Objections to Definitions as set forth above.

15 SoCalGas objects to the terms "INCIDENT" and "FACILITY," as well as the undefined
16 terms "response" and "leaks or releases at or from the FACILITY," as vague and ambiguous.

17 SoCalGas objects to this Topic to the extent it is overbroad as to scope, unduly
18 burdensome, harassing, and seeks information that is neither relevant to the subject matter of this
19 litigation nor reasonably calculated to lead to the discovery of admissible evidence.

20 SoCalGas objects to this Topic to the extent it seeks information that is protected by
21 privilege, including but not limited to information protected by the attorney-client privilege, the
22 attorney work product doctrine and any other applicable privilege or protection.

23 SoCalGas objects to this Topic to the extent it seeks confidential, proprietary, and/or
24 private information.

25 SoCalGas objects to this Topic to the extent it seeks to require it to respond on behalf of
26 any entity other than SoCalGas.

27 SoCalGas objects that it is a separate entity from Sempra and is not in possession, custody
28 or control of information in the possession, custody or control of Sempra.

1 SoCalGas objects to this Topic to the extent it assumes facts not in evidence.

2 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

3 SoCalGas will produce, as applicable, a witness or witnesses in due course at a mutually-
4 agreeable time and location, and subject to further meet and confer, to provide non-privileged
5 testimony, to the extent not previously provided, regarding SoCalGas' knowledge concerning the
6 identified topic. Consistent with the objections stated herein and for purposes of clarifying the
7 scope of the Topic on which the witness or witnesses will be prepared to testify, SoCalGas
8 interprets the term "leaks" to mean unexpected and uncontrolled significant or persistent leaks of
9 natural gas from an underground storage well to the outside environment.

10 **OBJECTIONS TO DOCUMENT DEMANDS**

11 SoCalGas reasserts and incorporates each of the General Objections and Specific
12 Objections to Definitions, as well as each specific objection to each individual Topic, as set forth
13 above.

14 SoCalGas objects to each Request as duplicative and unduly burdensome to the extent it
15 seeks documents which SoCalGas has already produced in connection with and pursuant to the
16 ADP in this litigation, and to the extent it seeks documents outside of the topics, date range and
17 process agreed to in the ADP.

18 SoCalGas objects to the terms "OPERATING STANDARDS," "INCIDENT" and
19 "FACILITY," as well as the undefined terms "emergency response," "well," "equipment failure,"
20 "leaks," "large scale failure," "operation," "wells," "maintenance," "basic upkeep," "detection of
21 maintenance and/or repair needs," "minor repairs," "significant repairs," "inspection,"
22 "monitoring," "testing," "asset integrity," "assets," "asset needs," "improvements," "upgrades,"
23 "repairs," "underground storage wells," "safety procedures," "protecting," "interests,"
24 "remediating," "air borne contaminants," "produced by or released by the FACILITY,"
25 "operational tolerances," "makeup," "impact on operation," "responsibilities," "compliance,"
26 "rules or regulations," "oversight," "involvement," "day-to-day decisions," "pertaining to,"
27 "testimony," "assessing," "reservoir formation integrity," "financial planning," "budgeting," "cost
28 projections," "repair," "capital planning," "safety-related committees," "roles," "chain(s) of

1 command,” “personnel,” “audit-related committees,” “response,” “detection of the release,”
2 “stopping the release,” “actions,” “contents,” “stored at the FACILITY,” “constituents,”
3 “components,” “quantities,” “total quantities,” “air monitoring,” “emissions testing,” “air
4 sampling,” “quantification,” “released gas,” “health risks,” “potential harm to human health,”
5 “posed by the INCIDENT,” “property damage,” “potential harm to property,” “implementation,”
6 “funding of,” “reimbursement,” “Temporary Relocation Program,” “in response to and/or as a
7 result of the INCIDENT,” “as a result of the INCIDENT,” “leaks or releases at or from the
8 FACILITY,” “causes thereof,” “reviewed with,” “utilized by,” “relied upon,” “prepare,” “relate,”
9 “pertain to,” “evidence,” “reflect,” “associated with,” “responses to,” “health effects,” “posed
10 by,” “knowledge about,” “related to,” “emissions,” “any other wells,” “relating to,” “impacted
11 by,” “complaints, notices, notifications, orders, warnings, correspondence and/or information,”
12 “gas and/or other chemicals, material, or constituents,” and “the ‘killing’ of Well SS-25 in
13 February 2016” as vague and ambiguous.

14 SoCalGas interprets “OPERATING STANDARD” to mean the formal policy or policies
15 governing the specific subject of the identified Topic and associated Request. SoCalGas further
16 interprets “OPERATING STANDARD” to not include legal precedent, rules or regulations
17 issued by any governing body or agency, and/or third-party industry standard documents that may
18 inform SoCalGas’ policies.

19 SoCalGas objects that Requests to produce documents “which relate or pertain to,
20 evidence, and/or reflect the issues, topics, and/or events described in or associated with” an
21 individual Topic implicate an enormous number of documents and are, therefore, grossly
22 overbroad and unduly burdensome, and SoCalGas will not—nor is it required to—identify or
23 produce all such documents.

24 SoCalGas further objects that Requests to produce documents over multi-decade time
25 periods, as applicable, are grossly overbroad and unduly burdensome in that they potentially
26 implicate hundreds of thousands, if not millions, of documents.

27 The following responses are provided subject to the foregoing Objections to Document
28 Demands, which are incorporated by reference into each and every specific response as if set

1 forth in full.

2 **SPECIFIC RESPONSES TO DOCUMENT DEMANDS**

3 **DOCUMENT DEMAND NO. 1:**

4 For each matter identified above, please produce all DOCUMENTS reviewed with,
5 utilized by, and/or relied upon by the deponent to prepare for his or her deposition testimony.

6 **RESPONSE TO DOCUMENT DEMAND NO. 1:**

7 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
8 to Definitions, and Objections to Document Demands, as well as each specific objection to each
9 individual Topic, as set forth above.

10 SoCalGas objects to this Request to the extent it seeks information that is protected by
11 privilege, including but not limited to documents and/or information protected by the attorney-
12 client privilege, the attorney work product doctrine and any other applicable privilege or
13 protection. Further, SoCalGas has already produced non-privileged documents in connection
14 with and pursuant to the ADP, subject to the above objections—including the General
15 Objections—that are relevant to the Topics and the Requests. Based on the foregoing, SoCalGas
16 will not identify documents in response to this Request that counsel selected, provided to, and
17 reviewed with the witness or identify or produce documents for a second time in order to respond
18 to this Request.

19 **DOCUMENT DEMAND NO. 2.5:**

20 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
21 issues, topics, and/or events described in or associated with Topic 5:

22 SoCalGas' OPERATING STANDARDS concerning FACILITY emergency response,
23 including but not limited to: well and/or equipment failure, leaks, and or large-scale failure at the
24 FACILITY from January 1, 1978 to December 31, 2003.

25 **RESPONSE TO DOCUMENT DEMAND NO. 2.5:**

26 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
27 to Definitions, and Objections to Document Demands, as well as each specific objection to each
28 individual Topic, as set forth above.

1 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
2 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
3 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
4 produce documents for a second time in order to respond to this Request.

5 **DOCUMENT DEMAND NO. 2.6:**

6 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
7 issues, topics, and/or events described in or associated with Topic 6:

8 SoCalGas' OPERATING STANDARDS concerning FACILITY emergency response,
9 including but not limited to: well and/or equipment failure, leaks, and or large-scale failure at the
10 FACILITY from January 1, 2004 to the present.

11 **RESPONSE TO DOCUMENT DEMAND NO. 2.6:**

12 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
13 to Definitions, and Objections to Document Demands, as well as each specific objection to each
14 individual Topic, as set forth above.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
17 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
18 produce documents for a second time in order to respond to this Request.

19 **DOCUMENT DEMAND NO. 2.7:**

20 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
21 issues, topics, and/or events described in or associated with Topic 7:

22 SoCalGas' OPERATING STANDARDS concerning operation of the wells at the
23 FACILITY from January 1, 1978 to December 31, 2003.

24 **RESPONSE TO DOCUMENT DEMAND NO. 2.7:**

25 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
26 to Definitions, and Objections to Document Demands, as well as each specific objection to each
27 individual Topic, as set forth above.

28 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

1 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
2 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
3 produce documents for a second time in order to respond to this Request.

4 **DOCUMENT DEMAND NO. 2.8:**

5 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
6 issues, topics, and/or events described in or associated with Topic 8:

7 SoCalGas' OPERATING STANDARDS concerning operation of the wells at the
8 FACILITY from January 1, 2004 to the present.

9 **RESPONSE TO DOCUMENT DEMAND NO. 2.8:**

10 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
11 to Definitions, and Objections to Document Demands, as well as each specific objection to each
12 individual Topic, as set forth above.

13 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
14 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
15 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
16 produce documents for a second time in order to respond to this Request.

17 **DOCUMENT DEMAND NO. 2.9:**

18 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
19 issues, topics, and/or events described in or associated with Topic 9:

20 SoCalGas' OPERATING STANDARDS concerning maintenance of wells including but
21 not limited to: basic upkeep, detection of maintenance and/or repair needs, minor repairs, and/or
22 significant repairs at the FACILITY from January 1, 1978 to December 31, 2003.

23 **RESPONSE TO DOCUMENT DEMAND NO. 2.9:**

24 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
25 to Definitions, and Objections to Document Demands, as well as each specific objection to each
26 individual Topic, as set forth above.

27 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
28 SoCalGas has already produced non-privileged documents in connection with and pursuant to the

1 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
2 produce documents for a second time in order to respond to this Request.

3 **DOCUMENT DEMAND NO. 2.10:**

4 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
5 issues, topics, and/or events described in or associated with Topic 10:

6 SoCalGas' OPERATING STANDARDS concerning maintenance of wells including but
7 not limited to: basic upkeep, detection of maintenance and/or repair needs, minor repairs, and/or
8 significant repairs at the FACILITY from January 1, 2004 to the present.

9 **RESPONSE TO DOCUMENT DEMAND NO. 2.10:**

10 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
11 to Definitions, and Objections to Document Demands, as well as each specific objection to each
12 individual Topic, as set forth above.

13 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
14 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
15 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
16 produce documents for a second time in order to respond to this Request.

17 **DOCUMENT DEMAND NO. 2.11:**

18 [INTENTIONALLY LEFT BLANK]

19 **DOCUMENT DEMAND NO. 2.12:**

20 [INTENTIONALLY LEFT BLANK]

21 **DOCUMENT DEMAND NO. 2.13:**

22 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
23 issues, topics, and/or events described in or associated with Topic 13:

24 SoCalGas' OPERATING STANDARDS concerning FACILITY asset integrity including
25 but not limited to: identification of assets, identification of asset needs, identification of
26 improvements and/or upgrades to assets, prioritization of asset repairs and/or upgrades at the
27 FACILITY from January 1, 1978 to December 31, 2003.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.13:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
7 ADP, or has otherwise made available information regarding such documents pursuant to the
8 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
9 produce documents for a second time in order to respond to this Request.

10 **DOCUMENT DEMAND NO. 2.14:**

11 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
12 issues, topics, and/or events described in or associated with Topic 14:

13 SoCalGas' OPERATING STANDARDS concerning FACILITY asset integrity including
14 but not limited to: identification of assets, identification of asset needs, identification of
15 improvements and/or upgrades to assets, prioritization of asset repairs and/or upgrades at the
16 FACILITY from January 1, 2004 to the present.

17 **RESPONSE TO DOCUMENT DEMAND NO. 2.14:**

18 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
19 to Definitions, and Objections to Document Demands, as well as each specific objection to each
20 individual Topic, as set forth above.

21 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
22 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
23 ADP, or has otherwise made available information regarding such documents pursuant to the
24 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
25 produce documents for a second time in order to respond to this Request.

26 **DOCUMENT DEMAND NO. 2.15:**

27 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
28 issues, topics, and/or events described in or associated with Topic 15:

1 SoCalGas' OPERATING STANDARDS concerning the operation, maintenance, repair,
2 inspection, monitoring, and testing of underground storage wells at the FACILITY from January
3 1, 1978 to December 31, 2003.

4 **RESPONSE TO DOCUMENT DEMAND NO. 2.15:**

5 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
6 to Definitions, and Objections to Document Demands, as well as each specific objection to each
7 individual Topic, as set forth above.

8 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
9 In addition to being duplicative of Topic Nos. 7 and 9 as to operation, maintenance and repair, for
10 which SoCalGas incorporates by reference its responses to Document Demand Nos. 2.7 and 2.9,
11 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
12 ADP, or has otherwise made available information regarding such documents pursuant to the
13 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
14 produce documents for a second time in order to respond to this Request.

15 **DOCUMENT DEMAND NO. 2.16:**

16 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
17 issues, topics, and/or events described in or associated with Topic 16:

18 SoCalGas' OPERATING STANDARDS concerning the operation, maintenance, repair,
19 inspection, monitoring, and testing of underground storage wells at the FACILITY from January
20 1, 2004 to the present.

21 **RESPONSE TO DOCUMENT DEMAND NO. 2.16:**

22 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
23 to Definitions, and Objections to Document Demands, as well as each specific objection to each
24 individual Topic, as set forth above.

25 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
26 In addition to being duplicative of Topic Nos. 8 and 10 as to operation, maintenance and repair,
27 for which SoCalGas incorporates by reference its responses to Document Demand Nos. 2.8 and
28 2.10, SoCalGas has already produced non-privileged documents in connection with and pursuant

1 to the ADP, or has otherwise made available information regarding such documents pursuant to
2 the ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify
3 or produce documents for a second time in order to respond to this Request.

4 **DOCUMENT DEMAND NO. 2.17:**

5 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
6 issues, topics, and/or events described in or associated with Topic 17:

7 SoCalGas' OPERATING STANDARDS concerning safety procedures protecting the
8 interests of residents and businesses within a 10-mile radius of the FACILITY from January 1,
9 1978 to December 31, 2003.

10 **RESPONSE TO DOCUMENT DEMAND NO. 2.17:**

11 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
12 to Definitions, and Objections to Document Demands, as well as each specific objection to each
13 individual Topic, as set forth above.

14 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
15 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
16 ADP, or has otherwise made available information regarding such documents pursuant to the
17 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
18 produce documents for a second time in order to respond to this Request.

19 **DOCUMENT DEMAND NO. 2.18:**

20 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
21 issues, topics, and/or events described in or associated with Topic 18:

22 SoCalGas' OPERATING STANDARDS concerning safety procedures protecting the
23 interests of residents and businesses within a 10-mile radius of the FACILITY from January 1,
24 2004 to the present.

25 **RESPONSE TO DOCUMENT DEMAND NO. 2.18:**

26 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
27 to Definitions, and Objections to Document Demands, as well as each specific objection to each
28 individual Topic, as set forth above.

1 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
2 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
3 ADP, or has otherwise made available information regarding such documents pursuant to the
4 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
5 produce documents for a second time in order to respond to this Request.

6 **DOCUMENT DEMAND NO. 2.19:**

7 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
8 issues, topics, and/or events described in or associated with Topic 19:

9 SoCalGas' OPERATING STANDARDS concerning monitoring and or remediating air
10 borne contaminants produced by or released by the FACILITY from January 1, 1978 to
11 December 31, 2003.

12 **RESPONSE TO DOCUMENT DEMAND NO. 2.19:**

13 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
14 to Definitions, and Objections to Document Demands, as well as each specific objection to each
15 individual Topic, as set forth above.

16 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
17 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
18 ADP, or has otherwise made available information regarding such documents pursuant to the
19 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
20 produce documents for a second time in order to respond to this Request.

21 **DOCUMENT DEMAND NO. 2.20:**

22 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
23 issues, topics, and/or events described in or associated with Topic 20:

24 SoCalGas' OPERATING STANDARDS concerning monitoring and or remediating air
25 borne contaminants produced by or released by the FACILITY from January 1, 2004 to the
26 present.

27 **RESPONSE TO DOCUMENT DEMAND NO. 2.20:**

28 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections

1 to Definitions, and Objections to Document Demands, as well as each specific objection to each
2 individual Topic, as set forth above.

3 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
4 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
5 ADP, or has otherwise made available information regarding such documents pursuant to the
6 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
7 produce documents for a second time in order to respond to this Request.

8 **DOCUMENT DEMAND NO. 2.21:**

9 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
10 issues, topics, and/or events described in or associated with Topic 21:

11 SoCalGas' OPERATIONAL STANDARDS concerning operational tolerances, including
12 but not limited, gas volume, pressure, and makeup as well as their impact on operation of the
13 FACILITY from January 1, 1978 to December 31, 2003.

14 **RESPONSE TO DOCUMENT DEMAND NO. 2.21:**

15 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
16 to Definitions, and Objections to Document Demands, as well as each specific objection to each
17 individual Topic, as set forth above.

18 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
19 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
20 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
21 produce documents for a second time in order to respond to this Request.

22 **DOCUMENT DEMAND NO. 2.22:**

23 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
24 issues, topics, and/or events described in or associated with Topic 22:

25 SoCalGas' OPERATIONAL STANDARDS concerning operational tolerances, including
26 but not limited, gas volume, pressure, and makeup as well as their impact on operation of the
27 FACILITY from January 1, 2004 to the present.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.22:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
7 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
8 produce documents for a second time in order to respond to this Request.

9 **DOCUMENT DEMAND NO. 2.23:**

10 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
11 issues, topics, and/or events described in or associated with Topic 23:

12 SoCalGas' OPERATING STANDARDS for assessing and or monitoring reservoir
13 formation integrity at the FACILITY, from January 1, 1978 to December 31, 2003.

14 **RESPONSE TO DOCUMENT DEMAND NO. 2.23:**

15 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
16 to Definitions, and Objections to Document Demands, as well as each specific objection to each
17 individual Topic, as set forth above.

18 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
19 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
20 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
21 produce documents for a second time in order to respond to this Request.

22 **DOCUMENT DEMAND NO. 2.24:**

23 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
24 issues, topics, and/or events described in or associated with Topic 24:

25 SoCalGas' OPERATING STANDARDS for assessing and or monitoring reservoir
26 formation integrity at the FACILITY, from January 1, 2004 to the present.

27 **RESPONSE TO DOCUMENT DEMAND NO. 2.24:**

28 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections

1 to Definitions, and Objections to Document Demands, as well as each specific objection to each
2 individual Topic, as set forth above.

3 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
4 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
5 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
6 produce documents for a second time in order to respond to this Request.

7 **DOCUMENT DEMAND NO. 2.25:**

8 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
9 issues, topics, and/or events described in or associated with Topic 25:

10 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
11 rules or regulations issued by the California Department of Conservation, Division of Oil, Gas,
12 and Geothermal Resources, from January 1, 1978 to December 31, 2003.

13 **RESPONSE TO DOCUMENT DEMAND NO. 2.25:**

14 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
15 to Definitions, and Objections to Document Demands, as well as each specific objection to each
16 individual Topic, as set forth above.

17 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
18 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
19 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
20 produce documents for a second time in order to respond to this Request. Moreover, SoCalGas
21 will not produce copies of the actual rules or regulations to which the policies noted above, if any
22 exist, apply.

23 **DOCUMENT DEMAND NO. 2.26:**

24 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
25 issues, topics, and/or events described in or associated with Topic 26:

26 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
27 rules or regulations issued by the California Department of Conservation, Division of Oil, Gas,
28 and Geothermal Resources, from January 2, 2004 to the present.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.26:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
7 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
8 produce documents for a second time in order to respond to this Request. Moreover, SoCalGas
9 will not produce copies of the actual rules or regulations to which the policies noted above, if any
10 exist, apply.

11 **DOCUMENT DEMAND NO. 2.27:**

12 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
13 issues, topics, and/or events described in or associated with Topic 27:

14 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
15 rules or regulations issued by the California Public Utilities Commission from January 1, 1978 to
16 December 21, 2003.

17 **RESPONSE TO DOCUMENT DEMAND NO. 2.27:**

18 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
19 to Definitions, and Objections to Document Demands, as well as each specific objection to each
20 individual Topic, as set forth above.

21 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
22 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
23 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
24 produce documents for a second time in order to respond to this Request. To the extent the scope
25 of Topic No. 27 is intended to encompass additional rules and regulations and/or rules and
26 regulations governing any other aspect of SoCalGas' operations or business unrelated to
27 underground storage at the Aliso Canyon facility, it is vague and overbroad and SoCalGas will
28 not identify or produce any such documents in response to this Document Demand. Moreover,

1 SoCalGas will not produce copies of the actual rules or regulations to which the policies noted
2 above, if any exist, apply.

3 **DOCUMENT DEMAND NO. 2.28:**

4 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
5 issues, topics, and/or events described in or associated with Topic 28:

6 SoCalGas' OPERATING STANDARDS concerning the FACILITY'S compliance with
7 rules or regulations issued by the California Public Utilities Commission from January 1, 2004 to
8 the present.

9 **RESPONSE TO DOCUMENT DEMAND NO. 2.28:**

10 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
11 to Definitions, and Objections to Document Demands, as well as each specific objection to each
12 individual Topic, as set forth above.

13 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
14 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
15 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
16 produce documents for a second time in order to respond to this Request. To the extent the scope
17 of Topic No. 28 is intended to encompass additional rules and regulations and/or rules and
18 regulations governing any other aspect of SoCalGas' operations or business unrelated to
19 underground storage at the Aliso Canyon facility, it is vague and overbroad and SoCalGas will
20 not identify or produce any such documents in response to this Document Demand. Moreover,
21 SoCalGas will not produce copies of the actual rules or regulations to which the policies noted
22 above, if any exist, apply.

23 **DOCUMENT DEMAND NO. 2.29:**

24 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
25 issues, topics, and/or events described in or associated with Topic 29:

26 SoCalGas' financial planning, budgeting, and cost projections as to the operation,
27 maintenance, repair, inspection, monitoring, and testing of underground storage wells at the
28 FACILITY from January 1, 2004 to the present.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.29:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
7 ADP, or has otherwise made available information regarding such documents pursuant to the
8 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
9 produce documents for a second time in order to respond to this Request.

10 **DOCUMENT DEMAND NO. 2.30:**

11 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
12 issues, topics, and/or events described in or associated with Topic 30:

13 SoCalGas' financial planning, budgeting, and cost projections as to the capital planning
14 for underground storage wells at the FACILITY from January 1, 2004 to the present.

15 **RESPONSE TO DOCUMENT DEMAND NO. 2.30:**

16 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
17 to Definitions, and Objections to Document Demands, as well as each specific objection to each
18 individual Topic, as set forth above.

19 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
20 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
21 ADP, or has otherwise made available information regarding such documents pursuant to the
22 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
23 produce documents for a second time in order to respond to this Request.

24 **DOCUMENT DEMAND NO. 2.31:**

25 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
26 issues, topics, and/or events described in or associated with Topic 31:

27 SoCalGas' safety-related committees, including the roles, responsibilities, chain(s) of
28 command, and personnel assigned to such committees, from January 1, 2004 to the present.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.31:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
7 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
8 produce documents for a second time in order to respond to this Request.

9 **DOCUMENT DEMAND NO. 2.32:**

10 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
11 issues, topics, and/or events described in or associated with Topic 32:

12 SoCalGas' audit-related committees, including roles, responsibilities, chain(s) of
13 command, and personnel assigned to such committees, from January 1, 2004 to the present.

14 **RESPONSE TO DOCUMENT DEMAND NO. 2.32:**

15 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
16 to Definitions, and Objections to Document Demands, as well as each specific objection to each
17 individual Topic, as set forth above.

18 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
19 SoCalGas does not have and has not had over the requested time period any audit committee.
20 Accordingly, SoCalGas does not possess any documents responsive to this Request.

21 **DOCUMENT DEMAND NO. 2.33:**

22 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
23 issues, topics, and/or events described in or associated with Topic 33:

24 SEMPRA's oversight of and involvement in day-to-day decisions pertaining to
25 underground storage wells at the FACILITY from January 1, 2004 to the present.

26 **RESPONSE TO DOCUMENT DEMAND NO. 2.33:**

27 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
28 to Definitions, and Objections to Document Demands, as well as each specific objection to each

1 individual Topic, as set forth above.

2 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
3 Sempra has no involvement in decisions pertaining to day-to-day operations of the underground
4 storage wells at the Aliso Canyon field. Based on the foregoing, SoCalGas will not produce or
5 identify any documents in response to this Request.

6 **DOCUMENT DEMAND NO. 2.34:**

7 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
8 issues, topics, and/or events described in or associated with Topic 34:

9 SoCalGas' response to the INCIDENT, including but not limited to, detection of the
10 release, stopping the release, repair of SS-25, and any/or other actions taken by SoCalGas at the
11 FACILITY in response to and/or as a result of the INCIDENT.

12 **RESPONSE TO DOCUMENT DEMAND NO. 2.34:**

13 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
14 to Definitions, and Objections to Document Demands, as well as each specific objection to each
15 individual Topic, as set forth above.

16 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
17 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
18 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
19 produce documents for a second time in order to respond to this Request.

20 **DOCUMENT DEMAND NO. 2.35:**

21 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
22 issues, topics, and/or events described in or associated with Topic 35:

23 SEMPRA's response to the INCIDENT, including but not limited to, detection of the
24 release, stopping the release, repair of SS-25, and any/or other actions taken by SEMPRA at the
25 FACILITY in response to and/or as a result of the INCIDENT.

26 **RESPONSE TO DOCUMENT DEMAND NO. 2.35:**

27 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
28 to Definitions, and Objections to Document Demands, as well as each specific objection to each

1 individual Topic, as set forth above.

2 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
3 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
4 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
5 produce documents for a second time in order to respond to this Request.

6 **DOCUMENT DEMAND NO. 2.36:**

7 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
8 issues, topics, and/or events described in or associated with Topic 36:

9 The contents of the gas stored at the FACILITY the week before the INCIDENT,
10 including but not limited to, the constituents and/or components of the gas, quantities of each
11 constituent, and total quantities.

12 **RESPONSE TO DOCUMENT DEMAND NO. 2.36:**

13 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
14 to Definitions, and Objections to Document Demands, as well as each specific objection to each
15 individual Topic, as set forth above.

16 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
17 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
18 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
19 produce documents for a second time in order to respond to this Request.

20 **DOCUMENT DEMAND NO. 2.37:**

21 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
22 issues, topics, and/or events described in or associated with Topic 37:

23 The contents of the gas stored at the FACILITY during the five (5) years prior to the
24 INCIDENT, including but not limited to, the constituents and/or components of the gas,
25 quantities of each constituent, and total quantities.

26 **RESPONSE TO DOCUMENT DEMAND NO. 2.37:**

27 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
28 to Definitions, and Objections to Document Demands, as well as each specific objection to each

1 individual Topic, as set forth above.

2 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
3 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
4 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
5 produce documents for a second time in order to respond to this Request.

6 **DOCUMENT DEMAND NO. 2.38:**

7 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
8 issues, topics, and/or events described in or associated with Topic 38:

9 SoCalGas' air monitoring, emissions testing, air sampling, and/or any quantification of
10 released gas and other constituents as a result of the INCIDENT.

11 **RESPONSE TO DOCUMENT DEMAND NO. 2.38:**

12 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
13 to Definitions, and Objections to Document Demands, as well as each specific objection to each
14 individual Topic, as set forth above.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
17 ADP, or has otherwise made available information regarding such documents pursuant to the
18 ADP, that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
19 produce documents for a second time in order to respond to this Request.

20 **DOCUMENT DEMAND NO. 2.39:**

21 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
22 issues, topics, and/or events described in or associated with Topic 39:

23 SoCalGas's knowledge about health effects and/or potential harm to human health that
24 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents
25 from Well SS-25 and/or any other wells at Aliso Canyon prior to and up to the date of the
26 INCIDENT.

27 **RESPONSE TO DOCUMENT DEMAND NO. 2.39:**

28 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections

1 to Definitions, and Objections to Document Demands, as well as each specific objection to each
2 individual Topic, as set forth above.

3 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
4 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
5 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
6 produce documents for a second time in order to respond to this Request.

7 **DOCUMENT DEMAND NO. 2.40:**

8 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
9 issues, topics, and/or events described in or associated with Topic 40:

10 SoCalGas's knowledge about health effects and/or potential harm to human health that
11 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents
12 from Well SS-25 and/or any other wells at Aliso Canyon from the date of the INCIDENT to the
13 present.

14 **RESPONSE TO DOCUMENT DEMAND NO. 2.40:**

15 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
16 to Definitions, and Objections to Document Demands, as well as each specific objection to each
17 individual Topic, as set forth above.

18 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
19 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
20 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
21 produce documents for a second time in order to respond to this Request.

22 **DOCUMENT DEMAND NO. 2.41:**

23 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
24 issues, topics, and/or events described in or associated with Topic 41:

25 SoCalGas's knowledge about and responses to complaints, notices, notifications, orders,
26 warnings, correspondence and/or information (other than by litigation consultants and/or expert
27 witnesses) relating to health risks and/or potential harm to human health posed by the
28 INCIDENT.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.41:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
7 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
8 produce documents for a second time in order to respond to this Request.

9 **DOCUMENT DEMAND NO. 2.42:**

10 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
11 issues, topics, and/or events described in or associated with Topic 42:

12 SoCalGas's knowledge about health effects and/or potential harm to human health that
13 would be impacted by the "killing" of Well SS-25 in February 2016 and continuing to the present.

14 **RESPONSE TO DOCUMENT DEMAND NO. 2.42:**

15 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
16 to Definitions, and Objections to Document Demands, as well as each specific objection to each
17 individual Topic, as set forth above.

18 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
19 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
20 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
21 produce documents for a second time in order to respond to this Request.

22 **DOCUMENT DEMAND NO. 2.43:**

23 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
24 issues, topics, and/or events described in or associated with Topic 43:

25 SoCalGas's knowledge about property damage and/or potential harm to property that
26 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents
27 from Well SS-25 and/or any other wells at Aliso Canyon prior to and up to the date of the
28 INCIDENT.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.43:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
7 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
8 produce documents for a second time in order to respond to this Request.

9 **DOCUMENT DEMAND NO. 2.44:**

10 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
11 issues, topics, and/or events described in or associated with Topic 44:

12 SoCalGas's knowledge about property damage and/or potential harm to property that
13 would be posed by or related to emissions of gas and/or other chemicals, material, or constituents
14 from Well SS-25 and/or any other wells at Aliso Canyon from the date of the INCIDENT to the
15 present.

16 **RESPONSE TO DOCUMENT DEMAND NO. 2.44:**

17 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
18 to Definitions, and Objections to Document Demands, as well as each specific objection to each
19 individual Topic, as set forth above.

20 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
21 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
22 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
23 produce documents for a second time in order to respond to this Request.

24 **DOCUMENT DEMAND NO. 2.45:**

25 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
26 issues, topics, and/or events described in or associated with Topic 45:

27 SoCalGas's knowledge about and responses to complaints, notices, notifications, orders,
28 warnings, correspondence and/or information (other than by litigation consultants and/or expert

witnesses) relating to property damage and/or potential harm to property posed by the INCIDENT.

RESPONSE TO DOCUMENT DEMAND NO. 2.45:

SoCalGas reasserts and incorporates each of the General Objections, Specific Objections to Definitions, and Objections to Document Demands, as well as each specific objection to each individual Topic, as set forth above.

Subject to and without waiving the foregoing objections, SoCalGas responds as follows: SoCalGas has already produced non-privileged documents in connection with and pursuant to the ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or produce documents for a second time in order to respond to this Request.

DOCUMENT DEMAND NO. 2.46:

Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the issues, topics, and/or events described in or associated with Topic 46:

SoCalGas's knowledge about property damage and/or potential harm to property that would be impacted by the "killing" of Well SS-25 in February 2016 and continuing to the present.

RESPONSE TO DOCUMENT DEMAND NO. 2.46:

SoCalGas reasserts and incorporates each of the General Objections, Specific Objections to Definitions, and Objections to Document Demands, as well as each specific objection to each individual Topic, as set forth above.

Subject to and without waiving the foregoing objections, SoCalGas responds as follows: SoCalGas has already produced non-privileged documents in connection with and pursuant to the ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or produce documents for a second time in order to respond to this Request.

DOCUMENT DEMAND NO. 2.47:

Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the issues, topics, and/or events described in or associated with Topic 47:

SoCalGas' implementation, funding of, and reimbursement associated with the Temporary Relocation Program.

1 **RESPONSE TO DOCUMENT DEMAND NO. 2.47:**

2 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
3 to Definitions, and Objections to Document Demands, as well as each specific objection to each
4 individual Topic, as set forth above.

5 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
6 SoCalGas has already produced or otherwise made available non-privileged, non-private data and
7 documents in connection with and pursuant to the ADP that are responsive to this Request. Based
8 on the foregoing, SoCalGas will not identify or produce documents for a second time in order to
9 respond to this Request.

10 **DOCUMENT DEMAND NO. 2.48:**

11 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
12 issues, topics, and/or events described in or associated with Topic 48:

13 Post-INCIDENT leaks or releases at or from the FACILITY and causes thereof.

14 **RESPONSE TO DOCUMENT DEMAND NO. 2.48:**

15 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
16 to Definitions, and Objections to Document Demands, as well as each specific objection to each
17 individual Topic, as set forth above.

18 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
19 SoCalGas has already produced or otherwise made available non-privileged data and documents
20 in connection with and pursuant to the ADP that are responsive to this Request. Based on the
21 foregoing, SoCalGas will not identify or produce documents for a second time in order to respond
22 to this Request.

23 **DOCUMENT DEMAND NO. 2.49:**

24 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
25 issues, topics, and/or events described in or associated with Topic 49:

26 SoCalGas's response to post-INCIDENT leaks or releases at or from the FACILITY.

27 **RESPONSE TO DOCUMENT DEMAND NO. 2.49:**

28 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections

1 to Definitions, and Objections to Document Demands, as well as each specific objection to each
2 individual Topic, as set forth above.

3 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
4 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
5 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
6 produce documents for a second time in order to respond to this Request.

7 **DOCUMENT DEMAND NO. 2.50:**

8 Please produce all DOCUMENTS which relate or pertain to, evidence, and/or reflect the
9 issues, topics, and/or events described in or associated with Topic 50:

10 SEMPRAs response to post-INCIDENT leaks or releases at or from the FACILITY.

11 **RESPONSE TO DOCUMENT DEMAND NO. 2.50:**

12 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
13 to Definitions, and Objections to Document Demands, as well as each specific objection to each
14 individual Topic, as set forth above.

15 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
16 SoCalGas has already produced non-privileged documents in connection with and pursuant to the
17 ADP that are responsive to this Request. Based on the foregoing, SoCalGas will not identify or
18 produce documents for a second time in order to respond to this Request.

19 **DOCUMENT DEMAND NO. 3:**

20 For each deponent, please produce a copy of his or her current resume or CV, as well as a
21 copy of any and all prior testimony, whether provided in an individual or representative capacity,
22 including any and all deposition testimony, trial testimony, sworn statements, affidavits,
23 declarations, expert reports, and/or testimony before a legislative, regulatory or investigative body
24 or agency.


25 **RESPONSE TO DOCUMENT DEMAND NO. 3:**

26 SoCalGas reasserts and incorporates each of the General Objections, Specific Objections
27 to Definitions, and Objections to Document Demands, as well as each specific objection to each
28 individual Topic, as set forth above.

1 Subject to and without waiving the foregoing objections, SoCalGas responds as follows:
2 At a time that is reasonable, appropriate and feasible, for each witness testifying in connection
3 with this Deposition Notice, SoCalGas will identify or produce: (a) that person's current resume,
4 CV or other appropriate professional biography, if one exists; and (b) if any, public deposition
5 testimony, trial testimony, and/or testimony before a legislative, regulatory or investigative body
6 or agency of such persons to the extent they were provided on behalf of SoCalGas or in
7 connection with work performed by them for SoCalGas, concern issues relevant to the specific
8 subject matter of the Topic for which the person has been designated, and are identified after a
9 reasonable search and diligent inquiry.

10 Dated: March 27, 2018

MORGAN, LEWIS & BOCKIUS LLP

11
12
13 By 
14 Yardena R. Zwang-Weissman
15 Attorneys for Defendants
16 SOUTHERN CALIFORNIA GAS
17 COMPANY and
18 SEMPRA ENERGY
19
20
21
22
23
24
25
26
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28

PROOF OF SERVICE

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 300 South Grand Avenue, Twenty-Second Floor, Los Angeles, California 90071-3132.

On March 27, 2018, I served the within document(s):

**DEFENDANT SOUTHERN CALIFORNIA GAS COMPANY'S
OBJECTIONS TO SECOND AMENDED NOTICE OF
DEPOSITION OF DEFENDANT, SOUTHERN CALIFORNIA GAS
COMPANY, BY PLAINTIFF THE PEOPLE OF THE STATE OF
CALIFORNIA [GROUP 2]**

☒ BY HAND - by causing the document(s) listed above to be delivered by courier to the person(s) at the address(es) set forth below on today's date.

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by electronic service **via Case Anywhere**: I attached a true and correct copy of the above-entitled document(s) to **Case Anywhere** by electronic transfer for service on all counsel of record by electronic service pursuant to the Order Authorizing Electronic Service. This service complies with C.C.P. § 1010.6.

3
4 and




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9 **SEE ATTACHED SERVICE LIST**

10 Executed on March 27, 2018, at Los Angeles, California.

11 I declare under penalty of perjury, under the laws of the State of California, that the above
12 is true and correct.

13 

14 Michelle M. Bronk

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EXHIBIT D

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.550],)
)
) JCCP NO. 4861

SOUTHERN CALIFORNIA GAS LEAK CASES)

THIS DOCUMENT RELATES TO: _____)

The People of the State of)
California, et al., v. Southern)
California Gas Company)
(Case No. BC602973))

— — —

MAY 1, 2018

— — —

Videotaped deposition of MAY LEW, VOLUME I,
held in the offices of Morgan Lewis, 300 South Grand
Avenue, Suite 2400, Los Angeles, California, commencing
at 9:31 A.M., on the above date before Pamela Cotten,
CSR, RDR, Certified Realtime Reporter, Certificate
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I N D E X

Witness: MAY LEW, VOLUME I

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BY MS. WIEMAN -----	144

E X H I B I T S

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Exhibit 8-1	4/21/03 Interoffice Memo to Marco Tachiquin from May Lew, Subject: Gas Quality of Aliso Canyon Low Pressure System, Three Pages	124
Exhibit 8-2	Southern California Gas Company Measurement Collection System Gas Analysis Report - Full Composition (mole%) - Hourly from 10/16/15 to 10/23/15, Six Pages	175
Exhibit 8-3	Southern California Gas Company Measurement Collections System Gas Analysis Report - Full Composition (mole%) - Daily from 10/23/10 to 10/16/15, 52 Pages	191
Exhibit 8-4	Southern California Gas Company Measurement Collections System Gas Analysis Report - Full Composition (mole%) - Hourly from 10/16/15 to 10/23/15, Six Pages	200

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4	Exhibit 8-5	Southern California Gas Company Measurement Collections System Gas Analysis Report - Full Composition (mole%) - Daily from 10/23/10 to 10/16/15, 52 Pages	203
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8	Exhibit 8-6	Southern California Gas Company Measurement Collections System Gas Analysis Report - Full Composition (mole%) - Hourly from 10/16/15 to 10/23/15, Six Pages	206
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12	Exhibit 8-7	Southern California Gas Company Measurement Collections System Gas Analysis Report - Full Composition (mole%) - Daily from 10/23/10 to 10/16/15, 52 Pages	208
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16	Exhibit 8-8	Southern California Gas Company Measurement Collections System Gas Analysis Report - Full Composition (mole%) - Hourly from 10/16/15 to 10/23/15, Six Pages	216
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20	Exhibit 8-9	Southern California Gas Company Measurement Collections System Gas Analysis Report - Full Composition (mole%) - Daily from 10/23/10 to 10/16/15, 52 Pages	217
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E X H I B I T S

(Continued)

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Deposition

Description

Page

4

Exhibit 8-10

Document Titled "XI. Gas
Quality," Revised 9/11/00

253

5

Bates Nos. SCG00923482 - 484

6

Exhibit 8-11

Document Titled "Analysis"
Bates No. SCG01566711

291

7

Exhibit 8-12

Gas Quality Monitoring,
Recommended Method: 188.002
Bates Nos. SCG01627705 - 711

316

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QUESTIONS NOT ANSWERED

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Line

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1 LOS ANGELES, CALIFORNIA - TUESDAY, MAY 1, 2018

2 9:31 A.M.

3 VIDEO OPERATOR BROWN: Good morning. We are now on
4 the record. My name is Darnell Brown, and I'm the
5 videographer with Golkow Litigation Services. Today's
6 date is May 1st, 2018, and the time is 9:31 A.M.

7 This video deposition is being held in
8 Los Angeles, California, in the matter of In Re Porter
9 Ranch, for the Superior Court of California,
10 Los Angeles County.

11 The deponent is May Lew.

12 Counsel will be noted on the stenographic
13 record.

14 The court reporter is Pam Cotten, who will now
15 swear in the witness.

16

17 MAY LEW,
18 called as a witness, and having been first duly sworn by
19 the Certified Shorthand Reporter, was examined and
20 testified as follows:

21

22 EXAMINATION

23 BY MR. PARRIS:

24 Q Is it Mrs. or Ms.?

25 A Ms.

1 Q Ms.

2 Okay. Hi, I'm Rex.

3 A Hi.

4 Q I represent the plaintiffs, some of the
5 plaintiffs, along with everybody else.

6 Before we start I wanted to let you know that
7 whenever I do these, especially when counsel like that
8 is staring at me, it makes me really nervous, and when
9 I get really nervous, my voice drops and people can't
10 hear me. So if at any time you can't hear me, will you
11 tell me?

12 A Yes.

13 Q Okay. Great.

14 Before we start, is there anything you need,
15 anything you want, anything that would make this more
16 comfortable? It is going to be uncomfortable, but --

17 A No, I'm fine. Thank you.

18 Q Okay. Good. Then let's start.

19 What do you do?

20 A I'm an engineer for Southern California Gas
21 Company.

22 Q And why are you here today?

23 A I was asked to be here.

24 Q Who asked you?

25 MR. JAMES: Calls for speculation.

1 BY MR. PARRIS:

2 Q Who asked you?

3 A Who asked me?

4 Q Yes.

5 A I was asked by David.

6 Q David who?

7 A David Logan.

8 Q And who is he?

9 A He's our lawyer. He is my lawyer.

10 Q And what did he ask you to do?

11 MR. JAMES: Objection. Attorney-client privilege.

12 BY MR. PARRIS:

13 Q What did he ask you to do?

14 MR. JAMES: Same. I'm instructing the witness not
15 to answer.

16 BY MR. PARRIS:

17 Q I take it that he did ask you to do something,
18 then?

19 MR. JAMES: Same objection.

20 BY MR. PARRIS:

21 Q Is that right?

22 MR. JAMES: Same objection.

23 Don't answer.

24 BY MR. PARRIS:

25 Q When did he ask you?

1 A Hmm. It must have been a couple of weeks ago.

2 Q Couple weeks ago. Do you have an
3 understanding of what you are supposed to do today?

4 A Yes. I'm supposed to come and answer your
5 questions.

6 Q Okay. And did anyone tell you that you are
7 designated for some specific reason to be here today?

8 A I was told there was two questions.

9 Q There was what?

10 A There was two questions I was here to answer.

11 Q And what is that?

12 A Off the top of my head, it was the gas
13 composition from a certain time period, five years --
14 five years before October 2015, the 23rd, and then that
15 was it.

16 Q That was it?

17 A Two questions -- I don't recall. It was just
18 two questions. It was just the gas composition from
19 Aliso Canyon.

20 Q What about after October 2015?

21 A I'm not here to answer that.

22 Q So is there a specific date that you are not
23 here to answer about?

24 A It was up -- it was -- I was to be here to
25 answer questions five years before October the 23rd,

1 2015.

2 Q Did you get fired on October 25th?

3 MR. JAMES: Objection. Argumentative.

4 THE WITNESS: No.

5 BY MR. PARRIS:

6 Q Why --

7 A I just came here to answer the questions I was
8 told to answer. It is just for that time period.

9 Q Were you told not to answer anything after
10 October 23rd?

11 MR. JAMES: Objection. Argumentative. If you want
12 to -- if you want to ask her about what the scope of
13 the PMQ topics are, why don't you put the PMQ notice in
14 front of her.

15 MR. PARRIS: Why don't you stay out of my
16 deposition, Counsel. All right? If you have an
17 objection to make, follow the rules.

18 MR. JAMES: I made my objection.

19 MR. PARRIS: We are not going to sit here for
20 14 hours and have you violate the rules. Okay?

21 MR. JAMES: I made my objection.

22 MR. PARRIS: The rules say you can object to the
23 form of the question or something privileged. Limit it
24 to that. Thank you.

25 Read the question back, please.

1 (Record read as follows:

2 "Question: Were you told not to
3 answer anything after October 23rd?")

4 MR. JAMES: Objection. Attorney-client privilege.

5 Don't answer if that's a question that invades
6 the conversations we had.

7 BY MR. PARRIS:

8 Q Do you know anything about the gas composition
9 after October 23rd --

10 MR. JAMES: Outside the scope.

11 BY MR. PARRIS:

12 Q -- 2015?

13 MR. JAMES: Objection. Outside the scope of the
14 PMQ topic.

15 You can answer if you know.

16 THE WITNESS: Oh. What was your question again?

17 MR. PARRIS: Read it back, please.

18 (Record read as follows:

19 "Question: Do you know anything
20 about the gas composition after

21 October 23rd --

22 Objection.

23 "Question: -- 2015?")

24 THE WITNESS: I've only come prepared to answer
25 questions that I was given.

1 BY MR. PARRIS:

2 Q I understand that.

3 A Okay.

4 MR. PARRIS: Read the question back, please.

5 (Record read as follows:

6 "Question: Do you know anything

7 about the gas composition after

8 October 23rd --

9 Objection.

10 "Question: -- 2015?")

11 MR. JAMES: I'm going to add the objection vague

12 and ambiguous.

13 BY MR. PARRIS:

14 Q Do you understand when we talk about gas
15 composition, we are talking about the natural gas
16 matrix coming out of Aliso Canyon? Do you understand
17 that?

18 A Yes.

19 Q Okay. And is that what you were prepared to
20 answer, the five years before the blowout?

21 A I provided data for that time period because
22 that was the question asked.

23 Can I -- is it possible if I could see those
24 questions, please?

25 Q See the questions?

1 A Yes, that you were asking. The two questions.

2 Q Of course.

3 A Just to remind me of those two questions. Not

4 yours. What I was here for originally, the two

5 questions that I'm here for.

6 Q If your counsel wants to show you something,

7 he certainly can.

8 A You can't show them to me?

9 Q I've never seen them.

10 A Oh.

11 Q Just assume that I'm a six-year-old and don't

12 understand anything about this as you answer my

13 questions. Okay?

14 A I think you are smarter than that, but okay.

15 Q I mean that. I mean it. The purpose of you

16 being here is to explain things to the jury. And in

17 order to do that, don't assume I have any advance

18 knowledge. Okay? Fair enough?

19 A Okay.

20 Q By the end of the day, you will think I am a

21 six-year-old. Okay? Thank you.

22 MR. PARRIS: What was the last question?

23 (Record read as follows:

24 "Question: Okay. And is that what

25 you were prepared to answer, the five

1 years before the blowout?

2 "Answer: I provided data for that
3 time period because that was the
4 question asked.")

5 BY MR. PARRIS:

6 Q Okay. You provided data. Does that mean you
7 are not here to answer questions?

8 A I'm here to answer those questions, those two
9 questions.

10 Q So far we only have one question. We haven't
11 figured out the second one.

12 THE WITNESS: Okay. Do you remember?

13 MR. JAMES: It is his deposition.

14 BY MR. PARRIS:

15 Q You don't know what the other reason you are
16 here for?

17 A No. It was to answer questions about the gas
18 composition coming out of Aliso Canyon five years
19 before October the 23rd, 2015.

20 Q Okay. What was coming out of there
21 October 22nd, 2015 -- or '14? I think it was '15.

22 A It was 2015.

23 (Mr. Rutger Parris enters the room.)

24 MR. JAMES: Objection. Vague and ambiguous.

25 THE WITNESS: Coming out of where? At what time?

1 BY MR. PARRIS:

2 Q SS-25.

3 A That was the second question. Okay. Thank
4 you. So the second question is what's coming out of
5 SS-25 for the same time period.

6 So I do not know --

7 MR. JAMES: Objection. Hold on. Objection.
8 Assumes facts not in evidence.

9 THE WITNESS: Oh.

10 MR. PARRIS: Well, presumably, nothing is in
11 evidence. That's why I'm asking questions, Counsel.
12 Come on.

13 What was the last question? He is confusing
14 me, Paul. This isn't fair.

15 (Record read as follows:

16 "Question: Okay. What was coming
17 out of there October 22nd, 2015 -- or
18 '14? I think it was '15.

19 "Answer: It was 2015.")

20 THE WITNESS: I don't know if -- what was coming
21 out, if there was anything coming out from SS-25.

22 BY MR. PARRIS:

23 Q You don't know what --

24 A We have the gas composition -- the gas
25 composition I provided was coming out of the storage

1 field through a meter at Aliso --

2 Q Through a?

3 A Through a meter at Aliso Canyon, not
4 necessarily at the SS-25 well.

5 Q What was the gas coming out of SS-25 at the
6 meter in regards to composition?

7 A I don't know. We -- we test the gas at the
8 storage field near -- at the meter. We don't test at
9 each individual well.

10 Q Even after the blowout?

11 MR. JAMES: Outside the scope.

12 THE WITNESS: That would be outside the scope.

13 BY MR. PARRIS:

14 Q You can still answer it, please.

15 A We only monitor-test the gas at the meter at
16 the storage field where it's the withdrawal gas coming
17 out.

18 Q What was your job title back in October of
19 2015?

20 A Principal engineer.

21 Q I'm sorry, what?

22 A Principal engineer.

23 Q What does that mean in regards to the chain of
24 command in regards to gas composition?

25 A Interesting question. So I'm the principal

1 engineer in our chemical and environmental section.

2 Q Does that mean you are the boss?

3 A No, I'm not the boss.

4 Q Who is the boss?

5 A My boss -- my boss?

6 Q Yeah. Who is your boss?

7 A My supervisor is Shahid Razzak. He is my
8 boss.

9 Q Was that true in October 2015?

10 A Yes, it was.

11 Q And how do you spell his last name?

12 A R-a-z-z-a-k.

13 Q And is he an engineer?

14 A He is a chemist.

15 Q He is a chemist?

16 A Yes.

17 Q Are you a chemist?

18 A No. I'm a chemical engineer.

19 Q What's the difference?

20 A We take different classes. I specialize in
21 the application more so than just the chemistry part of
22 it.

23 Q Explain that to me.

24 A You know, besides testing the gas, we would
25 determine what to do with the gas, how it is used, how

1 we would process it.

2 Q What do you mean "how it is used"?

3 A So what I -- what I look at is the gas, just
4 see if it could be used by our customers probably. So
5 when we look at the gas, we need to make sure it could
6 burn, like in your house, safely.

7 Q So do you have parameters --

8 A Yes.

9 Q -- that it has to meet?

10 A Yes, we do.

11 Q And how do you describe those parameters to a
12 six-year-old?

13 A Well, we have limits on the gas. So there's
14 various limits that we look at the gas in terms of --
15 in terms of if it could combust, we have a limit of
16 what the BTU range could be in gas.

17 Q What is that range for a residential consumer?

18 A Currently it is 990 BTUs per cubic feet.
19 That's the minimum heating value. And the maximum
20 heating value is 1150 BTUs per cubic feet.

21 Q And was that true back in 2015?

22 A Yes, it was.

23 Q And do you look at anything else?

24 A We look at the carbon dioxide content to see
25 if it is corrosive to our pipelines.

1 Q You look at the carbon dioxide levels to see
2 if it is coercive to the pipeline?

3 A Corrosive. Yes.

4 Q Anything else?

5 A We look at the oxygen level for the same
6 reason, to see if it is corrosive to the pipeline. We
7 look at the total inerts, which is nitrogen plus the
8 oxygen plus the carbon dioxide, and it has to be low
9 enough so that it will burn properly.

10 Q Within the BTU range?

11 A Besides the BTU range, we have limits for
12 total inerts.

13 Q What are the limits?

14 A For total inerts, it is 4 percent.

15 Q And how is that determined as to what is
16 appropriate or acceptable?

17 A We test the gas.

18 Q No, but how did you come up with 4 percent?

19 A How did we come up with 4 percent? You know,
20 I didn't come up with the 4 percent, but it was here
21 before I started working, but it is the same thing. We
22 determine what is combustible. So besides looking at
23 the BTU, we also look at the total inerts.

24 Q That's because it affects the BTUs; right?

25 A Correct.

1 Q Okay. Anything else?

2 A We look at the moisture level of the gas to
3 make sure, same reason, that it won't cause corrosion
4 and it won't cause pipeline operations.

5 Q Okay.

6 A We look at the hydrocarbon dew point percent
7 so that -- so that there won't be any liquids
8 condensing out of our pipeline.

9 Q What did you call that?

10 A Hydrocarbon dew point.

11 Q Okay.

12 A We also look at sulfur content, so we have
13 limits on sulfur. We have a hydrogen sulfide limit.
14 We have a total mercaptan limit and the total sulfur
15 limit.

16 Q Total what?

17 A Total sulfur.

18 So that's there because of -- one was for
19 hydrogen sulfide for corrosion. For mercaptan, it is
20 odorant level.

21 For total sulfur, we have that also for -- to
22 make sure we are under the local air district limits
23 for sulfur. So we want to make sure, you know, we
24 don't burn more sulfur than is allowed by the air
25 districts or by the CPUC.

1 Q So the hydrogen sulfide is because of --

2 A Corrosion.

3 Q -- coercion?

4 A Corrosion. It is corrosion. C-o-r-r.

5 Q I know that.

6 A Corrosion.

7 Q Corrosion. Right.

8 A Yes.

9 Q Good. Close enough?

10 MS. OLIVER: Yes.

11 THE WITNESS: It is a -- the H₂S -- the hydrogen

12 sulfide limit, they call it H₂S, it is also a limit

13 that's in our general order. It is in the CPUC,

14 California Public Utilities Commission, General

15 Order 58A. It states that our hydrogen sulfide limit

16 should be below, you know, the .25 grains of sulfur per

17 hundred cubic feet.

18 BY MR. PARRIS:

19 Q What does that translate into parts per
20 billion?

21 A Parts per billion or -- parts per billion?

22 Q Yes. What do you measure? Parts --

23 A We measure in parts per million. Four parts
24 per million.

25 Q What is it?

1 A Four.

2 Q Four?

3 A Yeah.

4 Q And that's -- you get that parts per million
5 from the State?

6 A Yes.

7 Q Any other --

8 A From the State or from --

9 Q Any other -- any other parameters that you try
10 to keep it in or that you are required to keep it in?
11 You are the one that says you can't put that gas into
12 the house; right?

13 A Yeah. The CPC says we can't deliver to
14 customers at higher than four parts per million.

15 Q Do you know why?

16 MR. JAMES: Calls for speculation.

17 THE WITNESS: Don't know.

18 BY MR. PARRIS:

19 Q Do you have an understanding of the dangers of
20 going above that?

21 MR. JAMES: Calls for speculation. Outside the
22 scope.

23 THE WITNESS: I'm not the right person to ask
24 exactly what those numbers are, but there are numbers
25 out there. But that four ppm is well under whatever is

1 published out there. I just can't cite it to you. I'm
2 not the person to ask. Off the top of my head.

3 BY MR. PARRIS:

4 Q Have you ever read what was published out
5 there?

6 MR. JAMES: Same objection.

7 THE WITNESS: I can't recall. Sorry.

8 BY MR. PARRIS:

9 Q And is that based on chronic exposure or
10 temporary exposure?

11 MR. JAMES: Same objection.

12 THE WITNESS: I cannot recall. Are you asking
13 about this --

14 BY MR. PARRIS:

15 Q Hydrogen sulfide at four parts per million.

16 A That's just what is stated in the -- in our
17 limit, we have the same limit, and in the general order
18 of the 58A, it is also the same.

19 Q So is there anybody else in the company in
20 regards to Aliso Canyon that would have a
21 decision-making function in regards to what to do if
22 the gas -- if the hydrogen sulfide exceeds four parts
23 per million other than you as the principal engineer?

24 MR. JAMES: Calls for speculation.

25 THE WITNESS: Yeah. I would have to guess on that

1 one, who exactly that is.

2 BY MR. PARRIS:

3 Q Well, has there ever been a time when it
4 exceeded that?

5 A I'm unaware of any time that exceeded that.

6 Q And we will get into how you monitor it and
7 how often you monitor it and how you test it.

8 What about benzene, do you test for that?

9 A We -- where?

10 Q Anywhere.

11 A We --

12 MR. JAMES: Outside the scope to the extent --

13 THE WITNESS: It is outside of our scope. I'm just
14 here to --

15 MR. JAMES: -- it's outside the time range.

16 THE WITNESS: Okay. So for the question -- for the
17 time period I'm talking about and for Aliso Canyon,
18 we -- we only monitor the gas. In terms of benzene, we
19 don't specifically monitor for it online.

20 BY MR. PARRIS:

21 Q What do you mean, online?

22 A So we have a gas chromatograph at Aliso
23 Canyon.

24 Q At Aliso Canyon?

25 A Yes.

1 Q Okay. Are you monitoring it as it goes in or
2 as it goes out?

3 A So we have -- we monitor both. We monitor as
4 it comes in and we monitor as it comes out.

5 Q Okay. So let's make certain I have everything
6 you are monitoring for. All right? You are monitoring
7 for water, vapor; right?

8 A At where?

9 Q Anywhere.

10 A Anywhere? Well, I'm here to answer the
11 question for Aliso; right?

12 Q No. You are here to answer whatever question
13 I ask you. If your counsel wants you to not answer, he
14 will say something, believe me. I mean, he is sitting
15 there ready to pounce.

16 A Okay. Well, I'll answer for Aliso because
17 that's why everybody is here. We do monitor --

18 Q Let me say this.

19 A -- for the water content --

20 Q Let me say this.

21 A -- at Aliso.

22 Q You are under oath. And you are here to
23 answer any question I ask you unless he tells you not
24 to.

25 Do you understand that? Do you?

1 A I'm going to try to answer your questions,
2 yes.

3 Q Okay.

4 A Right.

5 Q You keep qualifying your answer based upon
6 these two questions you were asked, and I just want to
7 be clear. That's not what we are doing here. What we
8 are doing here is they served you up to me to ask
9 questions, and I'm going to ask them and you are
10 required to answer them.

11 Fair enough?

12 A Okay. I will try to answer it if that's my
13 expertise.

14 Q Okay. Anywhere coming in and out of Aliso
15 Canyon.

16 A So, yes. We monitor the -- the water content
17 coming out of Aliso Canyon.

18 Q Okay. You monitor hydrogen sulfide; right?

19 A We test for hydrogen sulfide.

20 Q What's the difference?

21 A We do spot-testing for hydrogen sulfide at
22 Aliso. We don't monitor -- we don't have an online
23 monitor, a continuous monitor for H₂S at Aliso.

24 Q Okay. So there's a difference between
25 monitoring and testing; right? What triggers the

1 testing, the spot-testing for hydrogen sulfide?

2 A We do sulfur testing, which includes hydrogen
3 sulfide.

4 Q Do you monitor for sulfur or do you spot-test?

5 A We spot-test for sulfur at Aliso Canyon.

6 Q Before it is injected or after?

7 A At Aliso Canyon, we will do the spot-test upon
8 withdrawal.

9 Q Okay. What else?

10 MR. JAMES: Vague and ambiguous.

11 BY MR. PARRIS:

12 Q What else do you test for or monitor?

13 A So let's go back on the monitoring part of it,
14 yeah. So we have a gas chromatograph that will test
15 for hydrocarbon composition, and that's --

16 Q What kind?

17 A Hydrocarbon composition.

18 Q What kind of gas chromatograph do you use?

19 A What kind? What do you mean?

20 Q What's the brand?

21 A The brand. Oh, okay. Hmm. Off the top of my
22 head -- so it is the Danalyzer. It is the --

23 Q Are there different --

24 A It is model 500. Yeah. It is a model 500.

25 Q Model 500, what company?

1 A Danalyzer belongs to Emerson.

2 Q Emerson?

3 A Yes.

4 Q Okay. And has that been true the entire time
5 you have been the principal engineer?

6 A Yes.

7 Q Okay. Thank you.

8 Has it ever been upgraded?

9 A Not to my knowledge. It has always been the
10 same analyzer at Aliso. Is that what your question is?

11 Q Yes. Yes.

12 A Okay.

13 Q Do you know when it was purchased or when it
14 was installed?

15 A Not --

16 MR. JAMES: Outside the scope. Calls for
17 speculation.

18 THE WITNESS: I don't know. Not off the top of my
19 head.

20 BY MR. PARRIS:

21 Q Have any estimate of how old it is?

22 A Oh.

23 MR. JAMES: Calls for speculation.

24 THE WITNESS: I would have to guess. I don't know
25 what it is. No. It would be a total guess for me.

1 BY MR. PARRIS:

2 Q Okay. Thank you.

3 A Yeah.

4 Q Before you were the principal engineer, did
5 you work in or about Aliso Canyon at any time?

6 A Never.

7 Q Never. Bet you wish you never did, huh?

8 A What?

9 Q I bet you wish you never did, huh?

10 MR. JAMES: Outside the scope.

11 BY MR. PARRIS:

12 Q Okay. So we have sulfur, what else?

13 A So that's as much as we have out there at the
14 storage field, just the gas chromatograph and the
15 moisture analyzer.

16 Q Okay. The gas chromatograph. The moisture
17 analyzer --

18 A Yes.

19 Q -- that's a different machine; right?

20 A Yes.

21 Q So that's -- and the only thing you monitor
22 for would be water content. What about CO2?

23 A Oh. That's part of the gas chromatograph. So
24 it is not only hydrocarbons, it is carbon dioxide and
25 then it is the nitrogen content.

1 Q CO, nitrogen?

2 A CO2.

3 Q Nitrogen.

4 So you monitor for water vapor -- or water

5 content, CO2, nitrogen content and CO2 content. Right?

6 Anything else?

7 What about mercaptans, do you monitor that?

8 A No. That would be a test that we do.

9 Q Anything else?

10 A No.

11 Q What about methane?

12 A That's -- oh, okay. So the gas chromatograph

13 actually tests -- the hydrocarbon I meant was the

14 methane, ethane, propane, butanes, pentanes and hexanes

15 and heavier. That's what -- the hydrocarbons we look

16 at.

17 Q What do you mean, heavier?

18 A Oh. So we -- the hexanes, we test for up to

19 C6+.

20 Q Okay.

21 A So that's hexane and heavier.

22 Q You mean six carbons?

23 A Yes.

24 Q Thank you.

25 Anything else?

1 A For gas composition; right?

2 Q Well, wait a minute. It is making me think
3 there's a trick.

4 A No. That's it.

5 Q Do you monitor anything other than gas
6 composition?

7 A Do I personally monitor? No.

8 Q Does the company?

9 A The company -- well, the company measures the
10 gas, so there's a meter there, so they probably --

11 Q You mean the volume?

12 A The volume. So they look at, you know,
13 volume, that's it.

14 Q Now, you measure the volume of the gas before
15 it is injected; right?

16 MR. JAMES: Outside the scope.

17 THE WITNESS: Yeah. I would have to speculate
18 that. I'm not the measurement person. Sorry.
19 There's --

20 BY MR. PARRIS:

21 Q You don't have anything to do with that?

22 A I don't have anything to do with -- I don't
23 know exactly what meters they have out there in
24 details, no. I just know they measure the volume, yes.

25 Q Okay. Anybody measure or monitor the gas

1 composition at the site of the consumer?

2 MR. JAMES: Outside the scope. Vague and
3 ambiguous.

4 BY MR. PARRIS:

5 Q Do you know what consumer means?

6 A I do, but you said anybody, so.

7 Q Anybody outside --

8 A Anybody where?

9 Q Anybody -- okay. Fair enough.

10 A Yes.

11 Q Does Southern California Gas Company have
12 anyone, to your knowledge, that monitors the gas
13 composition at the search site?

14 MR. JAMES: Same objections.

15 THE WITNESS: It is outside the scope.

16 BY MR. PARRIS:

17 Q You don't get to do that. He gets to do that.

18 A I see.

19 Okay. So we do measure at our customers. It
20 is just the large customers that we monitor at, like
21 power plants.

22 Q Industrial customers?

23 A Or industrial customers. So we have -- we do
24 monitor what goes into our customers, the larger
25 customers, yes.

1 Q And do you have a role in that?

2 MR. JAMES: Outside the scope.

3 THE WITNESS: No.

4 BY MR. PARRIS:

5 Q None at all?

6 A Not for those.

7 Q Have you ever had a role in that?

8 MR. JAMES: Same objection.

9 THE WITNESS: No.

10 BY MR. PARRIS:

11 Q Do you have an understanding of how that
12 monitoring process takes place?

13 MR. JAMES: Same objection. Calls for speculation.

14 THE WITNESS: I'm not directly --

15 MR. PARRIS: Counsel, when I ask her if she has an
16 understanding, it can't possibly call for speculation.
17 She either does or she doesn't.

18 THE WITNESS: I'm going to -- well, I'm not
19 directly involved in -- was that your question?

20 BY MR. PARRIS:

21 Q Uh-huh.

22 A Yeah. I don't know exactly what they have at
23 each of our large customers who have gas
24 chromatographs.

25 Q Okay. So where does your responsibility end

1 in regards to the transmission of gas and measuring its
2 composition?

3 A So I mainly -- where does it end? Okay. I
4 just work in the lab. So, like gas chromatographs for
5 customers, I don't go -- we don't go to those sites.
6 We mainly do, you know, testing, you know, from the
7 lab, and we have knowledge of what -- like with what
8 the storage fields has. For our customer sites there's
9 a different group that works on it. We just -- we
10 primarily look at gas chromatographs for -- for our --
11 we call them BTU districts, so for our residential
12 customers. We have, like, units at major points around
13 our system, that's what our group is in charge of, and
14 not for the particular customers, the big -- those
15 large industrial customers, we don't deal directly
16 with.

17 Q Okay. Describe to me what it looks like when
18 the gas leaves the Aliso Canyon facility at the last
19 point it's measured by you or your group.

20 MR. JAMES: Outside the scope.

21 THE WITNESS: It is measured at the storage field.
22 It is not measured by our group. It is that gas
23 chromatograph at the plant.

24 BY MR. PARRIS:

25 Q All right. So there's one site where it is

1 measured; right?

2 A At Aliso Canyon?

3 Q Yes.

4 A Well, it is at Aliso, so there's gas --

5 there's a gas chromatograph as it comes in Aliso.

6 There's gas chromatographs as it comes out of Aliso.

7 Q Does that have a physical location?

8 A Yeah, it does. I just can't tell you exactly
9 where.

10 Q Okay. Have you ever seen it?

11 A I may have over the time. I just haven't,
12 like, had to touch it. It is basically at the storage
13 field by the meters.

14 Q And so the meters are at the storage field?

15 A Right.

16 Q You may or may not have seen them or seen one
17 of them?

18 A Well, I've seen the meters.

19 Q Where?

20 A At the storage fields, yes. It is on the
21 meter run. It is at the plant.

22 Q Say it again.

23 A It is on -- the meters are on like --

24 Q You can talk to me like a six-year-old, but
25 you can't look at me like one.

1 A Okay. So it is just meters that -- we have
2 like meter runs at the plant, so there is just maybe,
3 like, I think four meters there. And off of one of
4 those lines we have our -- we tap -- what it is is they
5 have a sample tap off the meter, and it goes into our
6 gas -- into the gas chromatograph that's specifically,
7 you know, for that meter run.

8 Q Okay. What's a meter run?

9 A It is just -- it is a pipe with a meter there.

10 Q Okay. So it is not a temporal thing. It is a
11 physical thing; right?

12 A What's temporal?

13 Q Time.

14 A Time.

15 Q You know, like a meter run during this period
16 of time.

17 A Oh, no.

18 Q Okay.

19 A No. It is a meter that's always there, and it
20 constantly tests for the flow rate. Yeah.

21 Q Okay. So when the gas is being monitored,
22 that's a 24-hour-a-day process; right?

23 A Yes.

24 Q Okay. And is there some type of 24-hour-a-day
25 readout that comes from this gas chromatograph?

1 A So the gas chromatograph will give a daily
2 average, yes.

3 Q A daily average.

4 A Yes.

5 Q It doesn't give you a continuous run?

6 A A gas chromatograph will test the gas
7 continuously, but it depends on what the -- it takes
8 time to analyze the gas; right? So it is like a
9 12-minute run. So every 12 minutes -- it will take --
10 you inject -- it injects into it, and it takes 12
11 minutes to analyze it, to determine all those
12 compounds. So it is every 12 minutes.

13 But the thing that we do -- that we do save or
14 look at is, like, the daily average of all those runs.

15 Q Okay. So just so I'm clear in the process,
16 every 12 minutes there's a report from the monitor,
17 like someone's computer; right?

18 A Yeah. It goes into the actual chromatograph.

19 Q Okay.

20 A But it depends on what we pull from it. So
21 the data that we look at is the daily average. It will
22 save -- it will also save the daily averages.

23 Q Okay.

24 A Yeah.

25 Q So it saves the daily average?

1 A Right.

2 Q What does it do with the every-12-minutes?

3 A It only -- the gas chromatograph can only hold
4 a certain number of data. So it holds seven weeks --
5 not seven weeks. Seven days.

6 Q Seven days.

7 A It holds seven days of data -- right? For --
8 I take that back. I'm going to say it actually holds
9 30 days of data.

10 Q Thirty days?

11 A And that's it. And so it just rolls out;
12 right? It can only save up to 30 days, and it rolls
13 through.

14 And what we -- so what we do is we could
15 save -- we also could save the daily averages. It is a
16 quick way to look at it; right?

17 Q It's like a Time Warner thing, when I save
18 something; right? When it hits 100 percent, it starts
19 knocking stuff off and rolls over; is that right?

20 A I don't know. I don't -- I never had that
21 issue.

22 Q Okay. But that's what happens.

23 A Okay.

24 Q Is that correct?

25 A Yeah. When it -- it just replaces it, you

1 know, it just writes over it. Yeah.

2 Q Thank you.

3 So it is never downloaded to a server?

4 A We have a measurement collection system in the
5 company, and it pulls into that database. It will pull
6 the daily average and the hourly average, but we don't
7 take the minute data -- we don't take the 12-minute
8 analysis. We just take the dailies and the hourly
9 averages.

10 Q What do you do with the hourly average?

11 A It is saved in this data -- it is saved in the
12 measuring collection system.

13 Q Is it saved forever?

14 A No. And I don't manage it. I can't tell you
15 what it is, but it should be saved. I don't know
16 offhand what the time period is for the measurement
17 collection system because we don't manage that part of
18 it, but they do save the data.

19 I would have to ask them how far back they go,
20 but you could tell, you know, when you go in and you
21 look for your -- the time period, we could go back and
22 look.

23 Q Okay.

24 A Yeah.

25 Q Who would I ask for that?

1 MR. PARRIS: Counsel, you are not allowed to shake
2 your head yes or no when she is looking for an answer.
3 That's cheating.

4 THE WITNESS: I don't know exactly who it is. Can
5 we provide that later if we have to?

6 BY MR. PARRIS:

7 Q Is there a department?

8 A Well, yeah. It is the measurement department.

9 Q It is called the measurement department?

10 A No. That's the -- that's why I have to go
11 look it up. We have something like a measurement
12 department. I don't know their exact --

13 Q Okay. Part of IT?

14 A They are part of the measurement department.

15 Q Okay.

16 A Yeah. I have to go check who that is.

17 Q I'm sure somebody will figure it out.

18 A Yes.

19 Q All right. So why are you concerned with the
20 daily average?

21 A We just want to make sure that -- why am I
22 concerned with the daily average?

23 Q In your job.

24 A In my job? Well, in general, it is just an
25 easier -- the gas doesn't vary that much, so it is just

1 easier for us just to look at the daily average in
2 general, yes.

3 Q Okay.

4 A Instead of a lot of data, like hourlies.

5 Q Right.

6 A So it depends on what the average is, and I'll
7 go back and check what the hourly is.

8 Q And is that because your primary concern is
9 the BTUs, the BTU range, the marketability of the gas?

10 A My primary concern is the gas quality. So
11 that's -- you know, we went over it earlier about all
12 the aspects of it.

13 Q Well, gas quality would be a lot more things;
14 wouldn't it? There would be arsenic; right? Did you
15 ever test for arsenic?

16 A We used to test for arsenic, yes.

17 Q When did you stop?

18 A I don't think we --

19 MR. JAMES: Outside the scope.

20 THE WITNESS: It is still listed. It is only when
21 we suspect it. Right now it is listed in our tariffs,
22 and it depends on -- it will tell you. It will say
23 for -- we just included arsenic into our gas quality,
24 to our -- for biomethane, so that's renewable gases.
25 So for landfill gas, we have to test for arsenic.

1 BY MR. PARRIS:

2 Q So when you say you just included arsenic --

3 A Yes.

4 Q -- as a gas you test for --

5 A Yes.

6 Q -- what does "just" mean?

7 A So we just changed our tariffs maybe -- was it
8 2015? We changed our tariffs a few years back to
9 include biomethane gas-quality specifications.

10 Q Okay. Is that company-wide or is that just in
11 Aliso Canyon?

12 A Oh, no. That's company-wide, and it applies
13 to biomethane.

14 Q Applies to what?

15 A Biomethane.

16 Q Bio?

17 A Biomethane.

18 Q Biomethane.

19 A Yes.

20 Q What is biomethane?

21 A Biomethane is gas that is from digested --
22 digesters like, you know, biogas, dairy gas --

23 Q Oh, I see.

24 A -- landfill gas --

25 Q I get it.

1 A -- sewage gas.

2 So it was landfill gas that there was concerns
3 that there might be constituents in there such as
4 arsenic, and so we have to -- if we do get gas from
5 landfills, we will test it for arsenic.

6 Q What about gas from the New Mexico fields?

7 A We test -- we don't test -- we only test that
8 gas from out of state. So are you referring to
9 something?

10 Q Hmm?

11 A What are you referring to in New Mexico?

12 Q Don't you get gas from the New Mexico fields?

13 A We get gas from out of state.

14 Q You have no idea where it comes from?

15 A We would have to ask our out-of-state
16 suppliers where their gas is coming from. We don't
17 have any control over it.

18 Q Okay. So the where it comes from, other than
19 being out of state, is not part of your decision-making
20 process of how to test; is that correct?

21 A Say that again.

22 Q Where the gas comes from --

23 A Where the gas comes from?

24 Q -- other than from coming -- other than coming
25 from out of state -- right?

1 A So in-state gas, is that what you are
2 referring to?

3 Q Let's start over. Okay?

4 A Okay.

5 Q All right. Gas will come from out of state;
6 right?

7 A Yes.

8 Q It will be injected into Aliso Canyon; right?

9 A Yes.

10 Q Before you inject it, you test it?

11 A Correct.

12 Q Now, does it matter where the out-of-state gas
13 originated in regards to what testing you do?

14 A Oh, okay. So for out-of-state gas, we test --
15 it is interesting. So for out-of-state gas, we
16 actually just monitor for the sulfur compounds to see
17 if there's enough odor in it.

18 So if you are referring to like -- I don't
19 know what you are referring to. So gas from New
20 Mexico. We were told that -- you know, if there was a
21 field that had arsenic in it, then we would monitor for
22 it, but we were told that that field with arsenic in
23 it, from years before I even started, was no longer in
24 operation. We were not getting any gas from that
25 particular field with arsenic in it.

1 Q Okay.

2 A Yes.

3 Q What about any other fields with arsenic?

4 A We are not aware of any with arsenic in it
5 that would be coming into our system.

6 Q You would have to test for it to be aware;
7 right?

8 A Yeah. Yes, you would. And there's --

9 Q And you don't test for it, do you?

10 A We don't -- we -- actually, we do test for it,
11 off and on, for arsenic if we -- for that field, but it
12 is no longer coming in. So before, we did. We tested
13 on a regular basis. But we were told it is not coming
14 in anywhere. But we do do spot-testing sometimes, but
15 we don't -- no. We don't have a reason to test for it.
16 We don't see signs of it in our system anymore.

17 Q How would you see a sign if you don't test?

18 A We would have complaints from our field. What
19 happens with arsenic, it is an arsenic compound of
20 sulfur and it deposits -- if it -- it will deposit on
21 our regulators or pressure cuts. We will see white
22 particles, but we don't see that. We haven't seen
23 it -- we haven't had complaints.

24 Q We are going to talk about complaints in a
25 little bit. Okay. It is my ADD. It puts me all over

1 the place, so I have got to go back and make sure I
2 have everything listed. Okay?

3 You test for sulfur, hydrogen sulfide,
4 moisture, CO₂, CO₂ nitrogen; right?

5 A The total inerts.

6 Well, I don't know why you do that. So it is
7 CO₂ and then it is nitrogen.

8 Q So you test for both?

9 A Yes.

10 Q I thought you were telling me --

11 A Then we add it together manually to see if it
12 is less than 4 percent.

13 Q Oh, I see.

14 A Yes.

15 Q Okay. I get it.

16 A Yes.

17 Q It doesn't matter if it is 3 percent CO₂ and
18 2 percent nitrogen --

19 A It matters to me, yes, because then when you
20 total it up, you get 3 plus 2, which is --

21 Q That is 5, so you have got to do something;
22 right?

23 A Correct.

24 Q What do you do?

25 A We will shut off the supply if it is above our

1 specification.

2 Q Don't we have gas shortages when we do that?

3 A I know, we do.

4 Q You do?

5 A But we don't do it -- it hasn't occurred. It
6 is just that if it goes above 4, we will do it.

7 Q I see.

8 A Yes.

9 Q But that has never happened, to your
10 knowledge; right?

11 A Where?

12 Q At Aliso Canyon.

13 A No. Yes, you are correct.

14 Q Okay. Thank you.

15 So those are the things you monitor. You
16 monitor sulfur, water, nitrogen, and CO2?

17 A We test for all those constituents.

18 Q You monitor those; right? Because you told me
19 there's a difference between --

20 A Yes, yes. So we monitor for water, and we
21 monitor for the hydrocarbon composition. We test for
22 the H2S, and we test for other sulfur compounds.

23 Q When you say you monitor --

24 A At Aliso.

25 Q -- the hydrocarbon composition, what does that

1 mean? I mean, methane is a hydrocarbon. What do you
2 mean by that? Isn't it?

3 A Yes. So I'm just -- hydrocarbon, methane,
4 ethane, propane, yes. So you are saying methane, so
5 that's a hydrocarbon, yes.

6 Q Right. So you monitor for all of it?

7 A Yes.

8 Q So you get a number --

9 A Yes.

10 Q -- that represents the amount of hydrocarbons
11 in the gas; right?

12 A We get a number for the methane, we get a
13 number for the ethane and the propane, the butanes,
14 pentanes, and hexane.

15 Q Okay.

16 A Yes.

17 Q And what toxic gases are in that composition?

18 MR. JAMES: Calls for speculation. Outside the
19 scope. Calls for expert testimony.

20 THE WITNESS: I'm not your safety person in what
21 causes toxic.

22 BY MR. PARRIS:

23 Q Do you know?

24 A I know if you have too much methane, you are
25 not going to have enough oxygen.

1 Q Because it won't combust; right?

2 A That would be toxic to you, yes.

3 Q Oh, a person --

4 A Yeah. Right. I mean, you are just asking me
5 this question. So it depends on how much; right? So.

6 Q So you spot-test for certain things; right?

7 A At Aliso, yes.

8 Q And you are involved in that, somewhat?

9 A Somewhat involved in it. Someone in our group
10 will do that particular job, yes.

11 Q Okay. Let's start with the things you test
12 for now. It is hydrogen sulfide; right? It is HS2 or
13 H2S?

14 A H2S is hydrogen sulfide.

15 Q Okay. Benzene; right?

16 A At Aliso Canyon, no, we don't test for -- test
17 for benzene.

18 Q Okay. You seem to qualify that. What were
19 you thinking?

20 A You were doing spot -- you were doing testing,
21 testing, yeah, so you are asking -- we don't
22 specifically test for benzene, like we --

23 Q Okay.

24 A Yeah, we just don't go out and just -- at
25 Aliso, we don't test for benzene.

1 Q I just want to know what you test for.

2 A Yeah, that's what I'm telling you.

3 Q Okay. Hydrogen sulfide. What else?

4 A We will sample the gas, and it will be
5 analyzed for the other sulfur compounds in the gas.

6 Q Like what?

7 A We look for --

8 Q You monitor the sulfur; right? Or you test
9 for the sulfur?

10 A It depends on where. So we monitor for the
11 sulfur from our out-of-state gas.

12 Q Okay. Is that a separate line that comes in,
13 is that a major line that comes in that you know this
14 is out-of-state versus in-state?

15 A When it -- where -- so at our border stations,
16 it's from out of state, yes.

17 Q Okay. So it is at the border stations that
18 you test --

19 A That we test for it, and we monitor for
20 sulfur, yes.

21 Q Okay. And that's with the Emerson 500 gas
22 chromatograph?

23 A No. That's another -- that is a sulfur
24 analyzer at the border stations.

25 Q Okay. So you monitor the sulfur coming in

1 from out of state. What do you do at Aliso Canyon in
2 regards to out-of-state? Anything?

3 A Well, it shouldn't change that much on the way
4 in, but we do have -- we do monitor for the hydrocarbon
5 composition.

6 Q Okay.

7 A That's for -- don't ask me why, but that's
8 for -- you know, that's for measurement purposes for
9 the storage field so they can operate and they know,
10 you know, what gases come in.

11 Q Okay. So so far I have you testing for
12 hydrogen sulfide. Anything else?

13 A At Aliso; right?

14 Q Yes.

15 A So sulfur compounds.

16 Q Sulfur compounds.

17 A Yes.

18 Q I thought you monitor for that.

19 A No, we test for it, yeah.

20 Q Okay. What else?

21 A That we test for. So that's all I'm aware
22 of -- that's all I'm aware, what's tested.

23 Q Spot-tested?

24 A Spot-tested at Aliso; right.

25 Q So the only thing you spot-test for at Aliso

1 is hydrogen sulfide and sulfur compounds; is that

2 accurate?

3 A Yes. Yes.

4 Q Okay. So have you -- so there is no testing

5 for benzene; right?

6 A No test.

7 Q Ever?

8 MR. JAMES: What was the question?

9 THE WITNESS: Yeah.

10 BY MR. PARRIS:

11 Q Ever.

12 A Ever. Like, we are just talking spot-testing
13 at Aliso Canyon, like, at the storage fields?

14 Q Uh-huh.

15 A Hmm. Ever, that's a long time.

16 MR. JAMES: Outside the scope. Outside the scope.

17 THE WITNESS: Can I just say it for the five years?

18 I'm certain that -- specifically that we went and --

19 you know, looked for benzene ever. Like a test, like a

20 spot-test, yeah, for five years. Yes, I'm fine with

21 that.

22 BY MR. PARRIS:

23 Q Okay.

24 A Yes.

25 Q So for five years --

1 A For the last --

2 Q -- there has been no spot-testing for benzene;
3 is that correct?

4 A From 2015 prior; right? So from 2010 to 2015,
5 no spot-testing for benzene at Aliso Canyon and the
6 storage field where I get the withdrawals, yeah.

7 Q Okay. In that five-year period, are you aware
8 of any testing of any kind for benzene at the Aliso
9 Canyon facility?

10 A So for the storage gas, no. Because, you
11 know, we have been asked that already. For the
12 storage-field gas from the storage zone, no. No, no
13 spot-testing at the storage zone.

14 Q Okay. And are you in charge or are you -- you
15 are the person that's responsible, at least in regards
16 to this litigation, for all the testing at Aliso
17 Canyon; is that correct?

18 A The gas --

19 MR. JAMES: Vague and ambiguous.

20 THE WITNESS: Yeah. Only for the gas composition
21 part of it with the monitoring, yes.

22 BY MR. PARRIS:

23 Q That's what I mean.

24 A Yes.

25 Q So the amount of benzene in the gas, that's

1 part of the composition; isn't it?

2 MR. JAMES: Assumes facts not in evidence.

3 THE WITNESS: I mean, we group it all into -- if

4 you are looking for benzene, it would be -- if it was

5 there, it would be part of the monitoring part of it,

6 but we wouldn't specifically know what that value was,

7 but it would be a really -- a trace level that was in

8 there.

9 BY MR. PARRIS:

10 Q How would you know that?

11 A How would I know that? Just based on our

12 experience when we have looked for it in general, it is

13 not at a very -- it is always in a trace amount.

14 Q So have you ever been aware of benzene levels

15 at -- anywhere in the Aliso Canyon formation being

16 higher than a trace amount?

17 A It depends on where you are at at Aliso, but

18 it wouldn't be the storage gas or the gas that comes

19 out of withdrawal and to our customers.

20 Q Where would it be? Are you saying there is

21 benzene there?

22 A No. If we had tested for it?

23 Q Yeah.

24 A I would have to look at the results. I mean,

25 if we had tested for benzene for other reasons, not the

1 storage gas, it would be something special that the
2 field would have asked to do, but it wouldn't have been
3 the storage-field gas. It is not -- you know, it is --

4 Q During your employment with Southern
5 California Gas Company, have you ever been involved
6 with testing the Aliso Canyon field for benzene?

7 MR. JAMES: Potentially outside the scope.

8 THE WITNESS: It is outside.

9 BY MR. PARRIS:

10 Q You still have to answer.

11 A It is? Okay. So -- so it is just for the
12 storage gases, that's why I keep on saying it is the
13 storage gas, but we do do testing in other locations in
14 that -- at Aliso, but it is not the storage-field gas
15 because storage fields gas doesn't have -- it only --
16 it doesn't have benzene in trace levels. It is our gas
17 from out-of-state.

18 Q How do you distinguish the difference?

19 A We can tell by the gas -- well, for Aliso
20 Canyon, at the storage gas, it would be gas that we
21 inject that comes out. But you can tell by the gas
22 composition if it is, you know, gas from out of state.
23 It is, you know, a lower BTU, it is a higher methane,
24 you know, less ethane, less propane.

25 Q Okay.

1 A Compared to other gases in the system.

2 Q Tell me if I'm wrong about this. My
3 understanding is you have this formation called the
4 Aliso Canyon formation. Right?

5 A Okay.

6 Q Is that right?

7 A I can't -- see, I'm not the storage field
8 engineer, and I don't -- and I'm not the right person
9 to ask about the storage formation.

10 Q Well, how do you know the difference between
11 gas that was naturally occurring and gas that was
12 injected into Aliso Canyon?

13 MR. JAMES: Outside the scope.

14 THE WITNESS: I would have -- you would have --
15 someone would have to tell me this is storage-field
16 gas, this is -- and what we test here, this is gas
17 that's not storage-field gas, and then we would just do
18 a comparison test.

19 BY MR. PARRIS:

20 Q Okay.

21 A So that's how one would do it.

22 Q So that's based upon samples coming to you
23 that are designated storage field versus something
24 else; right?

25 A Right. Someone would have to tell me. I

1 wouldn't be able to tell you.

2 Q Okay.

3 A I would have to ask him. They would have to
4 tell me. I get those -- I have to ask those questions
5 sometimes, or I sometimes just send it in and they will
6 say, hey -- they will tell me it is or not.

7 Q Why do you care? Why is that relevant to your
8 job?

9 A It is not, so I shouldn't. So what we have in
10 our lab is we have technicians that pull these samples.
11 So it is up to them to pull the sample and collect it.
12 If we have to title it properly, we would ask them.

13 Q Okay.

14 A But the title usually is what -- you know,
15 what that location is, but I would have to ask for that
16 location, is that storage gas, if I cared; right? Or
17 if you cared. You are asking me how.

18 Q I care.

19 A Yeah, you care, then you should ask, like, is
20 this location storage gas or, you know, what is it.
21 Yeah.

22 Q So how can there be a difference, physically,
23 how can there be a difference? Explain that to me.

24 MR. JAMES: Vague and ambiguous.

25 THE WITNESS: Difference in what?

1 BY MR. PARRIS:

2 Q Storage gas and other gas.

3 A Storage gas and what gas?

4 Q Other types of gas.

5 A Other types of gas? Storage gas would look
6 like our out-of-state gas. So we would compare our
7 out-of-state gas to storage gas.

8 Q Yeah, but don't they mix it all in the same --

9 A Don't know.

10 MR. JAMES: Calls for speculation.

11 BY MR. PARRIS:

12 Q -- storage reservoir?

13 A I don't know. I don't think so. It just has
14 to be from the storage zone. You would have to ask
15 somebody else.

16 Q Okay. So is it your understanding that --

17 MR. JAMES: We have been going about an hour. It's
18 time for a break.

19 MR. PARRIS: After an hour, you get a break?

20 THE WITNESS: Can I go?

21 MR. JAMES: Yes.

22 THE WITNESS: I drank two glasses of water.

23 MR. PARRIS: How can you be in these rich people's
24 firm if you only work an hour at a time, you know?

25 MR. JAMES: We also come -- we also show up on time

1 as well.

2 MR. PARRIS: Is it just poor lawyers that work more
3 than an hour at a stretch?

4 MR. JAMES: We would like to take a break.

5 MR. PARRIS: How long do you want?

6 MR. JAMES: Ten minutes. That's fine.

7 VIDEO OPERATOR BROWN: The time is now 10:31.

8 Going off the record.

9 (Recess taken.)

10 VIDEO OPERATOR BROWN: The time is now 10:50. Back
11 on the record.

12 BY MR. PARRIS:

13 Q Okay. What did you talk about?

14 A I can't --

15 MR. JAMES: Objection.

16 THE WITNESS: -- divulge that.

17 BY MR. PARRIS:

18 Q So we took a break, you talked to your
19 attorney. Is there any part of your testimony you want
20 to change?

21 A No.

22 Q Okay. So you have given me your very best
23 answers. Is that right?

24 A Yes.

25 Q And they are truthful; is that right?

1 A As far as I recall, yes.

2 Q Okay. Now, you understand in order to give a
3 truthful answer, you have to give me a full and
4 complete answer.

5 Do you agree with that?

6 A Really? I don't know. I have to answer your
7 question, yes.

8 Q Okay. So is it your opinion, as we have been
9 talking here, that when I ask you a question, you were
10 not obligated to give me a full and complete answer?

11 A I am obligated to answer your question, yes.

12 Q Okay. Let me ask it again. Is it your
13 understanding that in order to be truthful, you must
14 give me a full and complete answer?

15 A I am obligated to answer your question, yes.

16 Q Why do you not want to answer that question?
17 Well, you are not equivocating, I'm sorry. I thought
18 you were equivocating.

19 So you would agree with that; right?

20 MR. JAMES: Vague and ambiguous.

21 BY MR. PARRIS:

22 Q You would agree that your answers must be full
23 and complete?

24 A Yes.

25 Q Okay. Thank you. I'm sorry. I

1 misunderstood. Lawyers are paranoid creatures.

2 Okay. So is there any additions to anything
3 you have said up until now that you would like to make?

4 A No.

5 Q Okay. Thank you.

6 Now, you were talking about the storage gas, I
7 believe -- is that how you refer to it? -- versus some
8 other type of gas?

9 A We were talking -- we are here today to talk
10 about storage gas.

11 Q I'm sorry, what?

12 A We are here today to talk about storage gas.

13 Q Well, he might be, but I'm not. I'm here to
14 find out everything you know about anything that is
15 relevant to this case. Okay?

16 A Okay.

17 Q Thank you.

18 So what is the difference, in your mind,
19 between storage gas that you do testing for and other
20 types of gas?

21 MR. JAMES: Calls for speculation. Outside the
22 scope.

23 THE WITNESS: That's a vague question. What?

24 BY MR. PARRIS:

25 Q That's what --

1 A So we test for storage gas, we do test for
2 other gases.

3 Q Where do you get those gases?

4 MR. JAMES: Same objections.

5 BY MR. PARRIS:

6 Q The other gases that you test for that is not
7 storage gas, where do they come from?

8 MR. JAMES: Vague and ambiguous.

9 THE WITNESS: What -- can you rephrase it or --
10 what --

11 BY MR. PARRIS:

12 Q I'm sorry, what?

13 A What? Where does what come from?

14 Q You were talking to me earlier about storage
15 gases and that you also test for gases that come from
16 someplace else; right?

17 MR. JAMES: Misstates her testimony.

18 MR. PARRIS: Well, we can go back and look at it,
19 if you want.

20 THE WITNESS: What we do at the lab is we are
21 requested to go out to do testing, and if -- so it is
22 whatever we are requested to test for.

23 BY MR. PARRIS:

24 Q Do you have an understanding that sometimes
25 you test gases that have nothing to do with the storage

1 gases?

2 A Yes. We test for -- we will be requested to
3 test for gases, various gases.

4 Q Where do they come from?

5 A We are only -- you know, when we are initially
6 given the request, we are just given the location of to
7 test at.

8 Q And do you have a belief that that is not
9 storage gas? When we say storage gas, we are talking
10 about gas that was injected; right?

11 A Yes.

12 So if we are asked to test, we will test that
13 particular -- you know, a particular site. If we are
14 testing at the storage field, we will test at the
15 storage field. If we are testing anywhere else, we
16 would be told where to test for it. When you ask me --
17 that's all we are told, we are just -- we're given a
18 location or brought to a location, we test the gas.

19 Q Okay. So are there locations up in Aliso
20 Canyon that have nothing to do with injected gas?

21 A Yes.

22 Q What keeps them from getting mixed up?

23 MR. JAMES: Outside the scope. Calls for
24 speculation.

25 THE WITNESS: I don't know.

1 BY MR. PARRIS:

2 Q Do you have an understanding that they don't
3 mix?

4 MR. JAMES: Outside the scope.

5 THE WITNESS: I would be guessing. In my opinion,
6 it would depend on where it is at and where we are
7 pulling our samples at.

8 BY MR. PARRIS:

9 Q And what makes you believe that?

10 MR. JAMES: Same objection.

11 THE WITNESS: I have been told that.

12 BY MR. PARRIS:

13 Q Who told you?

14 A Whoever the requester is at the time.

15 Q Okay. So tell me how they tell you. Is it an
16 email? Is it a note? Is it verbal? How do you know
17 that you are not testing storage gas when they send you
18 to a location?

19 MR. JAMES: Outside the scope.

20 THE WITNESS: If they would tell me, they tell me.
21 It just -- it depends on who is the requester. If they
22 tell me just the test -- if they tell us -- it is not
23 me specifically, if they tell us to test the location,
24 we show up and test the gas.

25 ///

1 BY MR. PARRIS:

2 Q Okay. And so sometimes do you show up at a
3 location that you believe has nothing to do with
4 injected gas?

5 A I -- I wouldn't know unless they tell me.

6 Q Okay.

7 A Unless the requester told me.

8 Q Has anybody told you that?

9 MR. JAMES: Outside the scope.

10 THE WITNESS: Well, yes, we do get requests that I
11 have been told, you know, test here. It is for --

12 BY MR. PARRIS:

13 Q Are you --

14 A It is gas from -- you know, it is just gas
15 from wherever they are -- however they describe it to
16 me, that's what they tell me.

17 There's a lot of terminology that they will
18 give me, and it is not necessarily -- they don't say
19 nonstorage, they will just give me different wording,
20 like it is from the -- you know, from this location, it
21 is the tubing, but I don't know what tubing is; right?
22 I don't know what that means. It is just that you test
23 from here, from the tubing. But I don't ask -- I mean,
24 I don't normally ask them is it storage or is it what.
25 It is just you test here.

1 Q Okay. I get that. Why do you believe that
2 sometimes that involves gas that has not been injected?

3 MR. JAMES: Outside the scope.

4 THE WITNESS: It would be something someone would
5 tell me. It just depends on the request.

6 BY MR. PARRIS:

7 Q Has anybody ever told you that, hey, this is
8 not storage gas --

9 MR. JAMES: Outside the scope.

10 BY MR. PARRIS:

11 Q -- this is some other kind of gas?

12 A From my recollection -- if it is nonstorage
13 gas, yes -- I mean, I would be told something else.
14 Whatever it is, they would tell me what the gas is or
15 what the name of the source is.

16 Q How do we, meaning the people who have been
17 injured by this gas, when we ask for records, ask to
18 distinguish between storage gas and some other type of
19 gas?

20 MR. JAMES: Assumes facts not in evidence. Outside
21 the scope.

22 THE WITNESS: Again, I would say you should ask.

23 BY MR. PARRIS:

24 Q So there is a distinction; is that right?

25 A It is -- you know, it is outside my knowledge.

1 I mean, they -- someone -- the requester would tell me
2 if it is, you know -- it normally is the -- if it is
3 storage gas or it is from a certain location, they
4 would just tell me the location --

5 Q Give me some locations that you believe --

6 A I don't --

7 Q -- do not involve testing storage gas.

8 A It's --

9 MR. JAMES: Outside the scope.

10 THE WITNESS: Say that again.

11 MR. PARRIS: Read the question back, please.

12 (Record read as follows:

13 "Question: Give me some locations that you
14 believe do not involve testing storage gas.")

15 BY MR. PARRIS:

16 Q I should add to that that you tested.

17 A I mean, there's a lot of locations that I
18 tested, but it is outside of Aliso.

19 Q Okay.

20 A Like a storage field, right.

21 Q So we are not talking about Aliso Canyon.

22 A Yeah. What are we talking?

23 Q I'm asking you.

24 A We test gas.

25 Q Okay. So let's see if we can narrow it. All

1 of the gas that you test from Aliso Canyon is, your
2 understanding, storage gas. Is that correct?

3 A It just depends --

4 MR. JAMES: Vague and ambiguous as to time.

5 THE WITNESS: Yeah. I just don't -- I mean, we do
6 test -- we go up in that area and we do test for gas in
7 that area, and there's an area for the storage -- like,
8 we only go to, like, the -- if we go test for storage
9 gas, we are at the plant, the dehydration plant or at
10 the compressor plant.

11 And whatever goes in, I don't know, you know,
12 where it comes from. I'm just told this is, you know,
13 the storage gas here.

14 BY MR. PARRIS:

15 Q Okay. So if it hits the compressor --
16 right? -- or if it hits what, the dehydrator?

17 A Yes.

18 Q If it hits one of those two places --

19 A I --

20 Q -- you believe it to be storage gas; right?

21 A Yes. That's my belief, it is storage gas.

22 Q Okay. Do you have a belief that you do other
23 types of testing for gas in Aliso Canyon that has not
24 been injected into the formation?

25 A I would -- yes, I would have to be told that,

1 though, like this is a certain gas from this location.

2 Q A location in Aliso Canyon, but it doesn't mix
3 with --

4 A In that area.

5 Q -- the storage gas?

6 A Yes.

7 Q Okay. Do you have any estimate as to the
8 volume of that type of gas compared to storage gas --

9 MR. JAMES: Assumes facts not in evidence. Outside
10 the scope.

11 BY MR. PARRIS:

12 Q -- that comes out of the formation?

13 MR. JAMES: Assumes it -- same objection.

14 THE WITNESS: I don't have -- no, I don't know. I
15 don't have that number.

16 BY MR. PARRIS:

17 Q Do you know of any way to determine that
18 number?

19 MR. JAMES: Same objection.

20 THE WITNESS: I don't know.

21 BY MR. PARRIS:

22 Q So you know of no way to determine it?

23 A I --

24 MR. JAMES: Same objections.

25 THE WITNESS: Yes. That's not my job. I don't

1 know.

2 MR. PARRIS: Counsel, why are you doing that?

3 Unless you have a problem with the form of the
4 question, follow the rules. I get to ask her these
5 things. You know it. All you are doing is eating my
6 time and disrupting the deposition, and I would like
7 you to stop and start following the rules.

8 MR. JAMES: I said my objections. I stated my
9 objections.

10 MR. PARRIS: You don't get to do that.

11 MR. JAMES: I don't get to object? That's news to
12 me.

13 MR. PARRIS: Not unless it is to the form of the
14 question, that's correct, or privileged -- I'm asking
15 for something privileged. No, you do not. It is
16 against the rules. Could you follow the rules?

17 MR. JAMES: I am following the rules. I stated my
18 objections.

19 MR. PARRIS: No, you are clearly not.

20 BY MR. PARRIS:

21 Q You think it is important people follow the
22 rules; don't you?

23 MR. JAMES: Argumentative.

24 BY MR. PARRIS:

25 Q Do you?

1 A Yes.

2 Q Okay. Do you consider your job to be part of
3 ensuring the safety of the people living around Aliso
4 Canyon?

5 MR. JAMES: Outside the scope.

6 THE WITNESS: My job is to make sure the gas is
7 clean and it is usable and it will not harm the public,
8 yes.

9 BY MR. PARRIS:

10 Q Okay. So let's talk about the harm-the-public
11 part. What do you view your responsibilities to be in
12 regards to making sure the gas doesn't harm the public?

13 MR. JAMES: Outside the scope.

14 MR. PARRIS: The scope of what?

15 MR. JAMES: The PMQ topic for which she was
16 designated.

17 MR. PARRIS: She just told me that that's part of
18 her job.

19 MR. JAMES: That's different than what she was
20 designated for for purposes of this deposition --

21 MR. PARRIS: So what?

22 MR. JAMES: -- this PMQ topic.

23 MR. PARRIS: So what?

24 MR. JAMES: I objected.

25 MR. PARRIS: Read the question back, please.

1 (Record read as follows:

2 "Question: Okay. So let's talk
3 about the harm-the-public part. What do
4 you view your responsibilities to be in
5 regards to making sure the gas doesn't
6 harm the public?")

7 THE WITNESS: We -- I maintain that the gas-quality
8 specifications will be usable by our customers, by our
9 employees, and it is usable in our system and it won't
10 be -- it won't be a problem for -- you know, for
11 performance and for -- for our public. It has to be
12 safe for them to use the gas.

13 BY MR. PARRIS:

14 Q Okay. So are you confining your
15 responsibilities in regards to the safety of the public
16 to when they use the gas?

17 MR. JAMES: Outside the scope.

18 THE WITNESS: No. It is for -- we do -- you know,
19 especially for our employees, we want to make sure that
20 they could -- if they, you know, purge the gas out,
21 that it would be safe for them, right. So --

22 BY MR. PARRIS:

23 Q If they what?

24 A It would be safe for them. Like, if they had
25 to open up the line, if there's gas, we want to make

1 sure it is safe for them. But that's -- it should --
2 it should be covered in our gas-quality specifications.

3 Q Okay. So that's the employees. What about
4 the customer?

5 A It gets worse from -- so it includes the
6 public. If they are exposed -- if they use the gas, it
7 includes the public.

8 Q If they use the gas.

9 A Yeah. If the gas goes in their house, it
10 includes that too.

11 Q Have you ever taken in consideration the gas
12 that is coming out of the abandoned wells in the
13 neighborhood?

14 MR. JAMES: Outside the scope. Calls for
15 speculation. Assumes facts not in evidence.

16 BY MR. PARRIS:

17 Q He is really worried about that question. Can
18 you tell?

19 A We look at the gas that's coming, you know,
20 out of the storage field.

21 MR. PARRIS: Read the question back, please.

22 (Record read as follows:

23 "Question: Have you ever taken in
24 consideration the gas that is coming out
25 of the abandoned wells in the

1 neighborhood?")

2 MR. JAMES: Same objection. I'll add vague and
3 ambiguous.

4 THE WITNESS: That's not in my function, but if it
5 is an abandoned well, it wouldn't be gas that would be
6 coming into our system.

7 BY MR. PARRIS:

8 Q Why is that?

9 A It wouldn't be gas that would be coming into
10 our system. It would -- so we are looking at the
11 storage gas that's coming into our system, into our
12 pipeline, to our customers. If you are saying it is an
13 abandoned well, then there would be no gas coming into
14 our system.

15 Q It wouldn't migrate from the storage facility?

16 MR. JAMES: Calls for speculation. Outside the
17 scope. Assumes facts not in evidence.

18 THE WITNESS: I wouldn't know.

19 BY MR. PARRIS:

20 Q You don't know; is that correct?

21 A It is not -- you know, it is not my -- it is
22 not -- I'm not the expert on how gas is migrating from
23 the wells.

24 Q Have you ever heard that gas from the storage
25 facility might be going into the surrounding area

1 either through seepage or abandoned wells?

2 MR. JAMES: Outside the scope. Assumes facts not
3 in evidence.

4 THE WITNESS: No, not personally me.

5 BY MR. PARRIS:

6 Q Yeah, you personally.

7 A No.

8 Q Would that be a concern to you in regards to
9 you being responsible for the safety of the gas?

10 MR. JAMES: Calls for speculation. Outside the
11 scope. Misstates her testimony.

12 THE WITNESS: So I'm just here to talk about what
13 the gas is coming from the storage.

14 BY MR. PARRIS:

15 Q No, you are not here to talk about that. You
16 are here to answer my questions truthfully.

17 A It is not -- so I'm not working at storage.
18 I'm looking at gas that comes into our system, so I
19 can't answer that question. I don't know.

20 Q Okay.

21 A Right?

22 Q I don't know. You tell me.

23 A Yes, I cannot --

24 Q You told me you have responsibilities for

25 safety of the gas, and that's what -- I'm trying to

1 determine what that means.

2 A Okay. So I'm looking at gas that comes into
3 our system through a pipeline to our customers. I'm
4 not looking -- I'm not -- I don't work for -- I don't
5 work in the storage group. I don't look at what
6 happens within storage.

7 Q Okay. Well, maybe if we talk about why,
8 thinking of that, because what you said to me is that
9 if you open up a line and gas comes out and the worker
10 is exposed to it, that's a concern of yours; right?

11 A Yes, so --

12 Q What constituent part of the gas is --

13 A -- we do look at that. Yeah, we look at what
14 the -- well, someone from -- in the gas company will
15 look at what the exposure is to our employees, our
16 customers, and that will translate into our
17 specifications.

18 Q What does that mean, "translate into our
19 specifications"?

20 A If -- so if there is a concern for -- I don't
21 know, what could it be. Well, so if there is ever a
22 concern, we would -- and if there's a potential for a
23 gas supply to have that constituent, we would specify,
24 no, you know, we would shut you off, we don't want that
25 constituent in our gas.

1 Q So that's what your responsibility is is to
2 deal with the vendor?

3 A Is to deal with -- my responsibility is to
4 deal with -- if that gas is coming from a supplier,
5 then we would deal with that supplier.

6 Q Do you have any direct contact with the
7 supplier?

8 A Which supplier?

9 Q Any supplier.

10 A What kind of supplier?

11 Q The car wax supplier.

12 A No.

13 Q When you say supplier, what are you referring
14 to?

15 A I'm referring to gas suppliers.

16 Q Do you have any contact with gas suppliers?

17 A I do have contacts with our suppliers -- our
18 gas suppliers, yes.

19 Q Explain all forms of contact you have with the
20 gas suppliers.

21 MR. JAMES: Outside the scope.

22 THE WITNESS: It is outside the scope.

23 So the gas --

24 BY MR. PARRIS:

25 Q I live my life outside the scope. Have you

1 figured that out?

2 A Well, it is outside the scope because we have
3 gas -- we do have gas suppliers. So -- I mean, we do
4 have out-of-state gas suppliers. I don't talk to them
5 on a regular basis, but if there is an issue, we will
6 bring it up and talk to the gas suppliers.

7 Q Okay. An issue would be the quality of the
8 constituent parts of the gas; is that right?

9 A Well, it would be any of the parameters. If
10 they have high BTU, high Wobbe, we would point it out.
11 And it wouldn't be me personally. It would be someone
12 in the company. We would just look -- we would just
13 look at the quality, and then we would inform our --
14 whoever is dealing directly with the supplier to let
15 them know that it doesn't meet specification and they
16 need to take corrective action.

17 Q How do you find that person? How do you know
18 which person to pick up the phone and say, hey, this
19 company is not meeting specs?

20 A It is hard. Each supplier will have -- we
21 have people called account executives or we will have
22 managers that deal directly with those suppliers.

23 Q Okay. So when you become aware that the
24 natural gas matrix is out of specifications in any way,
25 you contact the account executive or the manager; is

1 that right?

2 MR. JAMES: Assumes facts not in evidence.

3 THE WITNESS: Yes. We do -- I would just -- I

4 don't have a -- I don't call them up. I -- you know, I

5 contact our -- you know, the managers, the account

6 execs, whoever is dealing with the supplier, and they

7 would inform them. It would have to go -- you know,

8 if --

9 BY MR. PARRIS:

10 Q How do you contact the account executive?

11 A How do I contact the account executives?

12 Q Yes. How do you alert them to the problem?

13 A It is either -- it is either emailed out to
14 them, message them -- yes, we email out to them. We
15 might give them a call. I personally; right?

16 Q Yes.

17 A Yes.

18 Q What's the company procedure?

19 MR. JAMES: Outside the scope.

20 THE WITNESS: I don't know if there's a company
21 procedure on how to contact people.

22 BY MR. PARRIS:

23 Q There's no policy or procedure of what you are
24 supposed to do when the gas that's measured is out of
25 spec?

1 A Are you --

2 MR. JAMES: Outside the scope.

3 THE WITNESS: We have procedures that will say
4 contact the -- whoever it is, the account executives or
5 the managers of that supplier.

6 BY MR. PARRIS:

7 Q Where would I find that procedure?

8 A It would be in our company -- it would be in
9 our company standards.

10 Q Your company standards?

11 A Yes.

12 Q Isn't that about 10,000 pages?

13 A I don't know how many pages.

14 Q Is there a specific section of the company
15 standards that that would be located in?

16 MR. JAMES: Outside the scope.

17 THE WITNESS: It would be -- it would be one of our
18 gas-quality standards.

19 BY MR. PARRIS:

20 Q One of our what?

21 A It would be one of our gas-quality standards.
22 But it would be internal documentation, I just don't
23 know what the number is off the top of my head.

24 Q In any given year in the last five years --
25 oh, I forgot. We are not talking about that.

1 A We are not talking about any --

2 Q In the last ten years that you have been with
3 the Southern California Gas Company, can you give me an
4 estimate of the number of times a year you contact an
5 account executive regarding the imported gas not
6 meeting specifications?

7 A So -- can you rephrase that?

8 Q Yeah. I'm happy to help you if you are not
9 following it.

10 A Yeah.

11 Q Can you give me an estimate of the number of
12 times in any average year that you contacted an account
13 executive regarding out-of-state gas not meeting
14 specifications?

15 A I can't off the top of my head, but it is not
16 very often.

17 Q More than five?

18 A No. It is not very often.

19 Q So it would be less than five times a year?

20 A It would be even -- if it even happened once a
21 year.

22 Q That would be unusual?

23 A Yes. For out-of-state, yes.

24 Q And this is for the compounds that you
25 monitor; right?

1 A Correct.

2 Q Okay. The only time you actually do
3 spot-testing is when the total sulfur content exceeds a
4 certain minimum or maximum; right?

5 A What are we talking about?

6 Q Well, you monitor for moisture, CO2, nitrogen;
7 right?

8 A Are we still talking about out-of-state gas?

9 Q Yeah.

10 A Okay. So for out-of-state gas, we monitor for
11 sulfur.

12 Q Total sulfur content; right?

13 A We monitor for sulfur. Total sulfur, hydrogen
14 sulfide, total mercaptans, and we look at the moisture
15 content. So for those constituents, very -- I don't
16 talk to the account execs.

17 So what happens there is the -- for our
18 out-of-state, the -- we have different people. But
19 even a different account exec. So if there are issues,
20 then we may talk to our gas control who talks to their
21 gas control, our gas -- then from there, if they talk
22 to me, then I talk to the account executives. It is
23 different.

24 Q Did you confuse me on purpose?

25 A I'm not supposed to. Okay.

1 Yeah, so for our out-of-states, it is very
2 important that we do monitor, and when it alarms, it is
3 a lot of gas. So we actually have -- we have
4 monitor -- we have people 24 hours who are looking at
5 that in gas control, so they will see it. And then
6 we'll get the call from them to tell me it's high, what
7 do we do.

8 Then we contact -- if they have already talked
9 to their people, then they will talk to me and then we
10 will talk to the account executives to see what they
11 can do, you know, higher up.

12 Q Okay. Limiting it to total sulfur, all right,
13 an alarm is triggered when it reaches a certain amount;
14 is that right?

15 A So for total sulfur, there's a limit, there's
16 an alarm, but -- there's an alarm for that amount, yes.

17 Q Do you know what it is?

18 A .75.

19 Q .750.

20 A 0.75 grains of sulfur -- or as sulfur per
21 100 cubic feet.

22 Q What does that translate into parts per
23 million?

24 A I can't tell you off the top of my head.

25 Q In that number would be the hydrogen sulfide;

1 right?

2 A That -- the total sulfur includes some --
3 total sulfur includes hydrogen sulfide in the total
4 sum.

5 Q Okay. What other compounds does it include?

6 A It includes the other sulfur compounds that
7 are analyzed.

8 Q Which are?

9 A I can't tell you off the top of my head. I
10 don't know. Because all I see is -- when I see those
11 numbers, it just says H₂S, total mercaptans, total
12 sulfur. It is already -- it is already added up before
13 it is sent out into gas control to look at. It's --

14 Q So it is mixed with the mercaptan number and
15 what other number?

16 A Total mercaptans, H₂S, and there's other
17 sulfides.

18 Q Okay. So how do you know if they are
19 measuring it as a conglomerate of gases if the hydrogen
20 sulfide has reached two parts per million?

21 A We actually -- so it is the three; right? We
22 look at H₂S, we look at total mercaptans, we look at
23 total sulfur. So how do we know? Because there's a
24 number that is given for H₂S.

25 Q Okay. So the H₂S is monitored for?

1 A Correct. It is part of the analysis at the
2 border stations.

3 Q Before it ever gets to Aliso Canyon; right?

4 A Yes.

5 Q And is that part of your function, is
6 monitoring it at the border?

7 A It is -- no. It is a function of, you know,
8 who was ever at the border to maintain that monitor.

9 Q What is your role once you get the data?

10 A When we review the data and -- well, so for
11 out-of-state, it is the gas-control people that are
12 looking at the data live and they see the alarms.

13 What we look at afterwards is we will look at
14 the data to understand, you know, what -- the daily --
15 we will take a quick look at the daily averages. We
16 will look at -- we will look at the ranges that we see
17 in a daily -- on a daily basis.

18 Q Okay. Do you ever look at the peak amount?

19 MR. JAMES: Assumes facts not in evidence.

20 THE WITNESS: I don't -- I don't look at it, but it
21 is recorded and gas control is notified of it.

22 BY MR. PARRIS:

23 Q Has anybody ever -- well, let me back up.

24 Do you ever concern yourself in any way with
25 any maximum amount of H₂S that has been injected into

1 the system at any time?

2 MR. JAMES: Outside the scope. Vague and
3 ambiguous.

4 THE WITNESS: If it is above the maximum?

5 BY MR. PARRIS:

6 Q No. There has to be a peak amount. What's
7 the highest amount of H₂S that has ever been injected
8 into Aliso Canyon at any time?

9 A Oh, okay.

10 Q To your knowledge.

11 A So I --

12 MR. JAMES: Outside the scope.

13 THE WITNESS: I don't look at that. I mean, we
14 review the data, and that's it. If it is close to the
15 max, then, yes, we would -- I would be concerned, but
16 it is -- it's usually very, very low. It is just a
17 trace amount.

18 BY MR. PARRIS:

19 Q It is usually very, very safe to drive on the
20 freeway until it is not.

21 A So we do -- I mean, we do look at it, so --
22 but it's -- you know, it has always been very low.

23 Q Have you ever been alarmed by the level of H₂S
24 going into the Aliso Canyon formation?

25 A No.

1 Q Never? Is that correct?

2 MR. JAMES: Asked and answered.

3 BY MR. PARRIS:

4 Q Never?

5 A Huh?

6 Q You have never been alarmed?

7 A So, from what I recall, for the, you know,
8 past five years and all that, no, we haven't had -- as
9 far as I can recall, we haven't had issues, so.

10 Q From the time you went to work for Southern
11 California Gas Company --

12 A I can't --

13 Q -- can you remember a time when you were
14 concerned about the amount of hydrogen sulfide going
15 into the formation?

16 MR. JAMES: Outside the scope.

17 THE WITNESS: I can't recall.

18 BY MR. PARRIS:

19 Q You don't recall ever being concerned; is that
20 correct?

21 A I don't recall from -- no, I don't recall.

22 Q Okay. Thank you.

23 Is that something you would have remembered?

24 A Yes. Definitely.

25 Q Okay. Good.

1 From the entire time you have worked at Aliso
2 Canyon, you have never been concerned about gas leaking
3 out of the field into the surrounding neighborhood; is
4 that true?

5 MR. JAMES: Outside the scope.

6 THE WITNESS: Yes. I don't work at Aliso Canyon.

7 MR. PARRIS: Ask the question again, please.

8 (Record read as follows:

9 "Question: From the entire time
10 you have worked at Aliso Canyon, you
11 have never been concerned about gas
12 leaks out of the field into the
13 surrounding neighborhood; is that
14 true?")

15 MR. JAMES: Same objection.

16 THE WITNESS: Yeah, I don't work at Aliso Canyon.

17 BY MR. PARRIS:

18 Q Ask the question again. I'm entitled to an
19 answer. I don't care what he says.

20 A So you asked the entire time I worked at Aliso
21 Canyon. I'm telling you I don't work at Aliso Canyon.

22 Q Oh, I see. Okay. Where do you work?

23 A I work at Pico Rivera.

24 Q Where?

25 A I work at Pico Rivera.

1 Q Is that where the control room is?

2 A No.

3 MR. JAMES: Vague and ambiguous.

4 BY MR. PARRIS:

5 Q Where is the control room?

6 A What control room?

7 Q Isn't there a control room that monitors the
8 gas?

9 A What --

10 MR. JAMES: Vague and ambiguous.

11 BY MR. PARRIS:

12 Q At Aliso Canyon or anywhere in the system.

13 A So there's a control room at Aliso Canyon. So
14 I don't work there.

15 Q All right. You work at Pico Rivera; right?

16 A Yes.

17 Q Do you work at an office?

18 A I work in the office, which is also in the
19 laboratory.

20 Q Okay. So describe your working environment
21 for me.

22 A I just told you. I work in the office and
23 also in the laboratory at Pico Rivera.

24 Q Okay. So if I were to describe my working
25 environment right now, I would say I'm at a very long

1 table with a bunch of mean-looking lawyers sitting at
2 it and a gray background behind the witness, I would
3 describe it. Describe your -- where you work.

4 A Describe my office?

5 Q Yeah. Is it an office with a desk and a
6 chair?

7 A Yes.

8 Q Is there -- is there some type of terminal
9 that gives you the data coming in about the composition
10 of the gas?

11 A We have -- no. So we have -- we have our
12 desktop or our computers. Then if we did want to
13 look -- so I don't, like, monitor that, what you are
14 describing, a terminal with data coming in. No. We
15 are -- I just work in an office with a computer.

16 Q Okay. So how are you alerted if the quality
17 of the gas changes?

18 A If the quality of the gas changes? It would
19 be someone external to the office. It would be someone
20 like in gas control or it would be someone that would
21 be working at that location who is monitoring that
22 data. They would let me know if there's a --

23 Q How do they let you know?

24 A We -- we would hear it through email, through
25 phone calls.

1 Q There's no established procedure of how you
2 are to be alerted?

3 A No specific established procedure, no. I
4 mean, we would just be -- if there was an issue, they
5 wanted us involved, if they wanted us to test it or to
6 verify it, then we would be called.

7 Q I see. So if they want you involved, what are
8 they asking you to do?

9 MR. JAMES: Calls for speculation.

10 THE WITNESS: If we were --

11 BY MR. PARRIS:

12 Q You said "if they want us involved," they
13 would contact you.

14 A They -- yes, they would -- it would just
15 depend on what they would be asking us. It just
16 varies. It depends on what the situation is --

17 Q Okay.

18 A -- what the issue is, what needs to be
19 verified. Just various processes.

20 Q What's your job description in regards to
21 that?

22 A We just respond to a request for testing gas.

23 Q Do you give them counseling?

24 A I could -- I would refer them to the
25 specification and ask him, you know, what is -- you

1 know, if they wanted a verification of the number, we
2 could say -- because if they are out in the field, they
3 say, "Oh, what's this limit," we could let them know or
4 "What's in the contract," we would let them know to
5 contact the account executive, you know, and we refer
6 them to that.

7 Q Okay. So let's talk about the information
8 that comes into your office. Okay. Your position with
9 the company. How is that information stream defined?

10 MR. JAMES: Vague and ambiguous.

11 THE WITNESS: Which information?

12 BY MR. PARRIS:

13 Q Well, you have to get some kind of information
14 to do your job.

15 A What are you --

16 Q How do you do your job every day?

17 MR. JAMES: Vague and ambiguous.

18 BY MR. PARRIS:

19 Q This isn't supposed to be a guessing game.
20 This is supposed to be both sides cooperating and
21 revealing all the information they have.

22 A Can you tell me specifically what you are
23 looking for?

24 Q I want to know what your job description with
25 Southern California Gas Company is and how you perceive

1 that on a day-to-day basis.

2 MR. JAMES: Asked and answered.

3 THE WITNESS: So I work at the engineering analysis
4 center in the chemical section, and when we get a
5 request and it is referred to me, we will just respond
6 to the request. And if it is testing, then we will go
7 test.

8 (Mr. Boucher enters the room.)

9 THE WITNESS: If they want clarification on their
10 test, they will go out and verify their test. If they
11 have a question on what the limit is, I could tell them
12 what the limit is, referring, you know, to the right
13 documentation.

14 BY MR. PARRIS:

15 Q Okay. So is it accurate to say that you are
16 not responsible for monitoring anything? You are
17 responsible for responding to people's requests about
18 what was monitored?

19 MR. JAMES: Misstates her testimony.

20 BY MR. PARRIS:

21 Q If that's wrong, just tell me how it is wrong.

22 A Yeah, so I don't do the day-to-day monitoring,
23 but if there's an issue for that day-to-day
24 monitoring -- if someone does, they will notify us if
25 it is an issue.

1 I do specify what monitors should be used and
2 how frequently we should be testing, but we don't --
3 and if we do have -- and we do respond to -- we do
4 respond to any test requests that would involve us
5 besides --

6 Q An average month --

7 A -- besides the monitoring, yes.

8 Q On an average month, how many requests do you
9 get for special testing?

10 A For special testing?

11 MR. JAMES: Outside the scope.

12 BY MR. PARRIS:

13 Q Company-wide.

14 A Company-wide? Not very often -- for me
15 personally or our group, we do get a lot of requests.

16 Q I thought you were the boss.

17 A No, I'm not.

18 MR. JAMES: Misstates her testimony.

19 THE WITNESS: I told you I'm not the boss. I'm the
20 principal engineer.

21 BY MR. PARRIS:

22 Q Okay.

23 A So I don't get requests specifically to me.
24 It would just be sent to me through, you know, what
25 they call my boss and I would get the requests.

1 Q Okay. So you are the principal engineer in
2 what department?

3 A In the chemical and environmental section.

4 Q Chemical and environmental section.

5 And it is your job to select the monitoring
6 equipment that the company uses; is that correct?

7 A I get to select -- I get to select the
8 monitors -- for gas quality, I get to select the gas
9 quality --

10 Q You don't get to do the crossing guard; right?

11 A No.

12 So -- so what we do is we'll evaluate whatever
13 monitor is out there, and then we approve it, and then
14 we will say, okay, you know, we will use this type of
15 monitor if you need it; right? So we -- we approve --
16 we approve the gas chromatograph that's used to go out
17 into the field.

18 Q Okay. That's what the chemical environment --
19 one of the things the chemical environmental section
20 does; is that correct?

21 A Yes.

22 Q Okay. And then sometimes somebody out in the
23 field or within some section of the company calls
24 you -- calls your department and says, "We need this
25 tested"; is that right?

1 A Yes. We will get requests.

2 MR. JAMES: Outside the scope.

3 BY MR. PARRIS:

4 Q Don't listen to him. Unless you are listening
5 for clues or signals. Are you?

6 MR. JAMES: Outside the scope.

7 THE WITNESS: This is attorney-client privilege.

8 MR. PARRIS: No, it is not.

9 MR. JAMES: Outside the scope.

10 MR. PARRIS: He is saying it in front of everybody,
11 so it is not privileged.

12 THE WITNESS: Okay. What's your question?

13 MR. PARRIS: Read it back, please.

14 (Record read as follows:

15 "Question: Okay. And then

16 sometimes somebody out in the field or

17 within some section of the company calls

18 you -- calls your department and says,

19 'We need this tested'; is that right?

20 "Answer: Yes. We will get requests.")

21 THE WITNESS: I answered it.

22 BY MR. PARRIS:

23 Q Is that correct?

24 A Yes.

25 Q Okay. Good.

1 So what do you do when you get a request to
2 test something?

3 MR. JAMES: Outside the scope.

4 BY MR. PARRIS:

5 Q Physically, what do you do?

6 A So if we get a request, we will schedule a
7 test, and if it requires going out in the field, I
8 would find someone to go out in the field to go sample
9 it -- sample it and bring it back to the lab for
10 analysis, if that's what it requires.

11 Q Okay.

12 A It depends on what the request is.

13 Q Okay. What else do you do in your job?

14 MR. JAMES: Outside the scope.

15 THE WITNESS: We -- besides requests, besides going
16 over the gas-quality limits, besides going over what
17 monitors are used and whatever -- you know, whatever
18 issues would pop up from people calling me with, you
19 know, if there's an alarm, what do we do.

20 BY MR. PARRIS:

21 Q Okay.

22 A All right.

23 Q So like on October 24th, did you get an alarm?

24 A No.

25 Q You never heard about an alarm at Aliso

1 Canyon?

2 A I don't -- we don't -- it had nothing to do
3 with -- did I get -- no. I didn't get anything on the
4 24th.

5 MR. PARRIS: Is that when it blew?

6 MS. OLIVER: 23rd.

7 MR. PARRIS: 23rd.

8 THE WITNESS: 23rd.

9 MR. PARRIS: Well, there's really no question about
10 that.

11 THE WITNESS: I didn't get -- no, not me.

12 BY MR. PARRIS:

13 Q Okay. Did your department?

14 A I don't know.

15 Q You never heard that your department was
16 contacted?

17 A I don't recall.

18 Q And your department is in charge of chemical
19 and environmental sections of the company; is that
20 right?

21 MR. JAMES: Misstates her testimony.

22 THE WITNESS: Our department is called chemical and
23 environmental, yes.

24 BY MR. PARRIS:

25 Q What does that mean to you?

1 MR. JAMES: Outside the scope. Calls for
2 speculation.

3 THE WITNESS: So we do testing for chemicals and we
4 also do environmental testing.

5 BY MR. PARRIS:

6 Q Is there any other section of the company that
7 was responsible for testing the constituent parts of
8 the gas being poured into Porter Ranch when that SS-25
9 blew other than your department?

10 MR. JAMES: Outside the scope. Calls for
11 speculation. Assumes facts not in evidence.

12 MR. PARRIS: He didn't like that question either.

13 MR. JAMES: Bad question.

14 MR. PARRIS: I ask a lot of bad questions. It is
15 the best I can do.

16 MR. JAMES: I agree.

17 MR. PARRIS: I didn't go to Harvard.

18 MR. JAMES: Neither did I.

19 MR. PARRIS: I bet you it was Ivy League, though.

20 MR. JAMES: You got me there.

21 MR. PARRIS: I didn't even graduate from high
22 school, so you can see the communication problem here;
23 right?

24 Do you want it read back?

25 THE WITNESS: No. I don't think your question was

1 accurate the way you said it.

2 MR. PARRIS: How can a question not be accurate?

3 An answer might not be accurate.

4 Read it back.

5 Well, I'll do it over. How about if I do it
6 over?

7 THE WITNESS: Rephrase it.

8 MR. PARRIS: Is that what they call it?

9 BY MR. PARRIS:

10 Q When SS-25 blew -- do you know what that means
11 when I say that?

12 MR. JAMES: Outside the scope.

13 THE WITNESS: No.

14 BY MR. PARRIS:

15 Q Okay. What do you refer to the events of
16 October 23rd, 2015, at the SS-25 blowout?

17 A I don't refer to it at all.

18 Q Okay. So as the principal engineer of the
19 company, you do not refer to the SS-25 incident on
20 October 23rd, 2015, at all?

21 A I --

22 MR. JAMES: Misstates her testimony.

23 THE WITNESS: So -- what was the question?

24 MR. PARRIS: Read it back, please.

25 (Record read as follows:

1 "Question: Okay. So as the
2 principal engineer of the company, you
3 do not refer to the SS-25 incident on
4 October 23rd, 2015, at all?")

5 THE WITNESS: I try not to.

6 BY MR. PARRIS:

7 Q Why is that?

8 A Something I don't deal directly with. I'm
9 principally looking at the gas inside our system.

10 Q Well, all that gas in that system came out;
11 didn't it?

12 MR. JAMES: Argumentative.

13 BY MR. PARRIS:

14 Q Didn't it?

15 MR. JAMES: Misstates -- assumes facts not in
16 evidence.

17 THE WITNESS: Some of the gas. I don't believe all
18 of the gas, and I don't know for sure.

19 BY MR. PARRIS:

20 Q A whole bunch of it came out; didn't it?

21 A I don't want to characterize it. So I would
22 refer to it as gas that leaked.

23 Q Is that how you refer to it --

24 A Yes.

25 Q -- is gas that leaked?

1 So was there any other department in the
2 company that on that day or any day thereafter till it
3 was stopped was responsible for determining the
4 constituent parts of the gas matrix that was spewing
5 out of that well?

6 MR. JAMES: Calls for speculation.

7 THE WITNESS: I don't know because I wasn't
8 involved in that part of it and what part of company
9 was involved in it. I wasn't called directly to work
10 on it.

11 BY MR. PARRIS:

12 Q Are you familiar with the standard operating
13 procedures for Southern California Gas Company?

14 A Not all of them.

15 Q Are you the only principal engineer at that
16 time?

17 A No.

18 Q How many principal engineers are there?

19 A I don't know.

20 MR. JAMES: Outside the scope. Calls for
21 speculation.

22 BY MR. PARRIS:

23 Q You don't know?

24 A I don't know.

25 Q How many principal engineers are in the

1 chemical environmental department?

2 A One.

3 Q And that is you?

4 A Yes.

5 Q And as the principal engineer of the chemical
6 environmental department of the Southern California Gas
7 Company on October 23rd, 2015, you don't know who or if
8 anyone was asked what the constituent parts of that gas
9 coming out of that well were; is that correct?

10 MR. JAMES: Misstates her testimony. Calls for
11 speculation. Outside the scope.

12 THE WITNESS: Yeah. I would -- I would be
13 guessing, but it was not me that was asked.

14 BY MR. PARRIS:

15 Q Do you have any information as to who it was?

16 MR. JAMES: Calls for speculation.

17 THE WITNESS: I don't know who was specifically
18 asked about it.

19 BY MR. PARRIS:

20 Q Do you know which department?

21 MR. JAMES: Calls for speculation. Misstates her
22 testimony.

23 THE WITNESS: Yeah, that would be a huge -- I mean,
24 I don't know who was asked.

25 ///

1 BY MR. PARRIS:

2 Q Was anybody asked, to your knowledge?

3 MR. JAMES: Calls for speculation.

4 MR. PARRIS: Counsel, it is nonsensical, that
5 objection. I asked "to your knowledge was anybody
6 asked."

7 THE WITNESS: I don't know. Not on that -- not on
8 that date, the 23rd, I don't know.

9 BY MR. PARRIS:

10 Q Any date 60 days after?

11 A I would have to --

12 MR. JAMES: Outside the scope.

13 THE WITNESS: Yeah. That's outside my scope. I
14 don't know. It wasn't me.

15 BY MR. PARRIS:

16 Q Tell me the truth.

17 A I am.

18 Q It is not outside anybody's scope. Do you
19 know?

20 MR. JAMES: Outside the scope.

21 THE WITNESS: Do I know?

22 BY MR. PARRIS:

23 Q If anybody in the company was responsible for
24 determining what the constituent parts of the natural
25 gas matrix coming out of that well, SS-25, any time

1 during the blowout?

2 MR. JAMES: Outside the -- outside the scope.

3 MR. PARRIS: I might have screwed that one up.

4 MR. JAMES: Calls for speculation.

5 MR. PARRIS: No. That was a good question.

6 THE WITNESS: Excuse me?

7 MR. PARRIS: That was a good question.

8 THE WITNESS: Okay. I don't know specifically who
9 was asked.

10 BY MR. PARRIS:

11 Q Do you know un-specifically?

12 A I know -- I know who my boss is.

13 Q Ahh, your boss.

14 A But I don't know if he was asked.

15 Q But your boss never talked to the principal
16 engineer about it; did he?

17 A No.

18 Q So do you have any understanding of where he
19 was getting his information, if he was getting his
20 information at all?

21 A I don't know who he was talking to
22 specifically.

23 Q Do you know if he was talking to anybody?

24 MR. JAMES: Outside the scope.

25 THE WITNESS: I -- it would be an assumption. I

1 don't know who -- but if he was talking to anybody, he
2 talks to people, yes. It is who --

3 BY MR. PARRIS:

4 Q You know the gravity of this; don't you?

5 A Yes, I do. So I don't know --

6 Q You know the children of that community were
7 breathing that gas. And I'm asking you who in the
8 company took the responsibility to determine exactly
9 what they were breathing.

10 MR. JAMES: Outside --

11 BY MR. PARRIS:

12 Q Do you know?

13 MR. JAMES: Outside the scope.

14 THE WITNESS: I can't answer that.

15 BY MR. PARRIS:

16 Q Is that because you do not know?

17 A I can't answer that.

18 Q Are you going to be in trouble if you answer
19 it?

20 MR. JAMES: Outside the scope.

21 THE WITNESS: I don't know. I can't answer that.

22 BY MR. PARRIS:

23 Q So is the answer "I don't know"?

24 MR. JAMES: Outside the scope. Asked and answered.

25 MR. PARRIS: Counsel, this is cross-examination,

1 and outside -- I mean, asked and answered is not a
2 proper objection. If you have any doubt, I would
3 suggest you look up Monroy versus City of Los Angeles,
4 164 Cal.App 4th, 268 [sic]. Thank you.

5 Repeat the question, please.

6 (Record read as follows:

7 "Question: So is the answer 'I
8 don't know'?")

9 THE WITNESS: What was the previous question?

10 BY MR. PARRIS:

11 Q I think I said -- asked, you know the children
12 of that community were breathing that gas, and I am
13 asking you in the company who took responsibility to
14 determine exactly what they were breathing?

15 MR. JAMES: Same objections.

16 BY MR. PARRIS:

17 Q And I believe you answered "I don't know." Is
18 that correct?

19 MR. JAMES: Same objections.

20 THE WITNESS: What was that last part? I don't --
21 the first part, I don't know something you are saying.

22 BY MR. PARRIS:

23 Q Oh.

24 A Right. But the second part was?

25 Q That's okay. I would like to know --

1 A So I just want you to rephrase the question.

2 Q Okay.

3 A Yes.

4 Q What don't you think is accurate about the
5 question?

6 A What was the last part of your question?

7 Q Oh. Who in the company took responsibility to
8 determine exactly what they were breathing?

9 A Oh --

10 MR. JAMES: Outside the scope.

11 THE WITNESS: I really don't know who -- who was
12 doing it in our department or who was in charge of it.

13 BY MR. PARRIS:

14 Q Was anybody doing it?

15 MR. JAMES: Calls for speculation. Outside the
16 scope.

17 BY MR. PARRIS:

18 Q Was anybody --

19 A I wasn't in charge of it. I wasn't asked to
20 do it, so I don't know who.

21 Q Okay. Do you have any reason to believe
22 anyone was testing that gas?

23 MR. JAMES: Calls for speculation. Outside the
24 scope. Misstates her prior testimony.

25 THE WITNESS: I don't know who.

1 BY MR. PARRIS:

2 Q That's different --

3 A Yes.

4 Q -- from telling me whether or not you have any
5 reason to believe anyone was testing the gas coming out
6 of SS-25 during the course of the blowout.

7 A Right. So from what I understand, there were
8 testing done. So, yes, there was someone testing.

9 Q What is your understanding about the testing
10 that was done?

11 A I don't know exactly what was done or what
12 was -- what's been -- I don't know exactly what the
13 tests -- I mean, I may have, you know, reviewed it to
14 see if there was any issues, but I don't know what
15 exactly was done. Reviewing what was available to the
16 public at the time, right, or whatever we were hearing
17 at the time. So I knew testing was done, but I don't
18 know exactly what was done.

19 Q As the principal engineer of the chemical and
20 environmental department, did you ever review any
21 testing during the SS-25 incident?

22 MR. JAMES: Outside the scope.

23 THE WITNESS: Not to that detail that -- no. I
24 don't -- so I wasn't in charge of doing the testing for
25 anything after October 23rd, 2015.

1 BY MR. PARRIS:

2 Q Were you curious as to why your department was
3 not doing the testing?

4 MR. JAMES: Outside the scope. Misstates her
5 testimony.

6 THE WITNESS: I don't know if they were testing or
7 what they were testing. I just didn't review it. If
8 there was something that I should know, I mean, someone
9 would have pointed it out to me, but no one pointed
10 anything.

11 BY MR. PARRIS:

12 Q You knew there was benzene in that formation;
13 didn't you?

14 MR. JAMES: Misstates her testimony. Outside the
15 scope.

16 THE WITNESS: No.

17 BY MR. PARRIS:

18 Q You didn't know --

19 A There's no --

20 Q -- there was benzene in that formation?

21 A That's not what I'm here -- I only -- I don't
22 know, and what I -- I don't -- I do know what's in the
23 storage. I'm pretty certain there was only -- if there
24 was any benzene, it would have been a very trace
25 amount. If that -- for storage. Yes.

1 Q What do you define as a trace amount?

2 A Any -- a part per million.

3 Q What?

4 A Like a single digit part per million would be
5 a trace amount, 1 ppm or zero -- well, zero would be
6 nothing, but, you know, a 1.

7 Q Anything between zero and one is a trace
8 amount?

9 A No. Anything in a part-per-million level
10 would be a trace amount.

11 Q What about 2 parts per million?

12 A That would be -- for benzene, that would be a
13 trace amount.

14 Q When does it no longer become a trace amount,
15 when it becomes a matter of concern?

16 MR. JAMES: Vague and ambiguous.

17 THE WITNESS: It would be something I would have
18 to -- well, when I do see something like a double
19 digit, I would have to run it through our safety
20 department and, you know, ask them that question, if
21 that's an issue or not.

22 But I don't get it. I don't have those -- you
23 know, I look, there's 1 ppm, it is in the gas. That's
24 a trace amount. It is not an issue.

25 ///

1 BY MR. PARRIS:

2 Q Okay. But I thought your job was to alert
3 safety if the constituent parts of the gas exceeded
4 certain limits?

5 A Well, yes. So --

6 Q Safety doesn't even know about it until you
7 tell them; right?

8 A Right. So we have -- when we do have our --
9 when we do here -- or we do test, we run it. If there
10 is a certain level above, like, say, a double-digit
11 number or something that I wouldn't be used to seeing,
12 I'm used to seeing 1 or 2. I'm not used to seeing
13 something greater than -- you know, anything greater
14 than 2. Nothing greater than 10.

15 If we do, then I would run it by safety. If
16 it's -- you know, if it is there and we tested it and
17 confirmed it, we would run it by our safety department.

18 Q Okay. So you don't get involved in benzene
19 testing until it reaches 10 parts per million or more;
20 is that correct?

21 A We don't -- it depends on who calls me and
22 when they are testing -- if they are surprised by it,
23 we will -- I'll say, oh, I got this level, and then I
24 will give a copy to our safety people to make sure it
25 is okay. It is their concern; right?

1 So -- but from my experience, I know when it
2 is 1 or 2 ppm, it is a -- there's not an issue from our
3 safety department.

4 Q Let's stay on benzene for a little bit.

5 Do you know whether or not long-term exposure
6 to benzene in any amount has detrimental health
7 consequences?

8 MR. JAMES: Outside the scope. Calls for expert
9 testimony. Calls for speculation.

10 THE WITNESS: I'm not the safety person, so I
11 wouldn't know what those levels are.

12 MR. PARRIS: Read the question back, please.

13 (Record read as follows,

14 "Question: Do you know whether or
15 not long-term exposure to benzene in any
16 amount has detrimental health
17 consequences?")

18 THE WITNESS: In any amount?

19 BY MR. PARRIS:

20 Q Yes.

21 A I can't tell you off the top of my head, but I
22 would have --

23 Q Has anybody ever asked you to test for benzene
24 at Southern California Gas Company?

25 MR. JAMES: Outside the scope. Vague and ambiguous

1 as to time.

2 THE WITNESS: I'm sorry. Ever, when, when exactly?

3 BY MR. PARRIS:

4 Q Do you understand --

5 A Yeah, you have to say specifically when.

6 Q No, I don't.

7 A You don't, so I don't -- I can't -- I'm sure I
8 have. I can't tell you when.

9 Q Is it your testimony to the jury you have no
10 recollection of ever being asked to test for benzene at
11 Southern California Gas Company?

12 A I mean, it would be part of a test request.
13 It wouldn't be exactly specifically test for benzene,
14 but we would -- if we did a test, it might include
15 benzene or if --

16 Q What's a chiller?

17 A A chiller?

18 Q Yes.

19 A It is -- you mean like in terms of natural
20 gas?

21 Q Yes.

22 A It is to cool gas, like through a
23 heat-exchanger, and chill it down.

24 Q And why would you use a chiller?

25 A Why would I use a chiller?

1 Q Why does Southern California Gas Company use a
2 chiller?

3 A Why would we use the chiller? We may use the
4 chiller to meet the dew-point specification, but for
5 certain gases in our system.

6 Q Dew point is what?

7 A Dew point is the -- it's the dew-point
8 temperature is the temperature. If you go below it
9 then, it may condense out and form liquids, which would
10 be an issue for our pipeline system.

11 Q So is that the only recognized use of a
12 chiller?

13 MR. JAMES: Calls for speculation. Outside the
14 scope.

15 THE WITNESS: I'm sure there's other uses. I
16 don't --

17 BY MR. PARRIS:

18 Q As the principal engineer of Southern
19 California Gas Company in your chemical and
20 environmental department --

21 A For the gas company?

22 Q Yes.

23 A We would use the chiller to meet the
24 hydrocarbon dew-point specification and for the -- it
25 also lowers, like, the heating value of the gas.

1 Q The what?

2 A The heating value.

3 Q Okay.

4 A Yeah, and the Wobbe number. W-o-b-b-e.

5 Q What's that?

6 A It is the heating value divided by the square
7 root of the specific gravity. Square root.

8 MR. PARRIS: I knew I should have graduated from
9 high school.

10 BY MR. PARRIS:

11 Q Now, do you ever use a chiller to lower the
12 benzene levels of the gas?

13 A Not -- no. Not me.

14 Q But you recommended it, didn't you?

15 MR. JAMES: Outside the scope.

16 THE WITNESS: I don't recall. No.

17 BY MR. PARRIS:

18 Q It would be wrong to artificially lower the
19 benzene levels of the gas, the natural gas, that found
20 its way into the neighborhood around Aliso Canyon;
21 wouldn't it?

22 MR. JAMES: Vague and ambiguous.

23 THE WITNESS: So if by lowering -- by chilling the
24 gas, it would be to remove -- it would be lowering
25 Wobbe, the heating value or lowering the hydrocarbon

1 dew point. And if one of -- whatever is going to
2 condense out, if there was benzene in it, it may
3 condense out, depending what the concentration was.

4 But other things will come out. I mean, it is
5 liquids --

6 BY MR. PARRIS:

7 Q It is to --

8 A It is to lower the dew point, to prevent
9 liquids -- or to prevent liquids from dropping out of
10 our gas into our pipeline.

11 Q I see. So you chill it so it comes out --

12 A Yeah, before it gets into our pipelines to our
13 customers. We don't --

14 Q Are you aware of any recognized use in the
15 industry of using a chiller to lower benzene levels?

16 MR. JAMES: Calls for speculation. Outside the
17 scope.

18 THE WITNESS: I don't know.

19 MR. PARRIS: Okay. Thank you.

20 MR. JAMES: Coming up to lunchtime, close to a
21 break time?

22 MR. PARRIS: Close, but not quite.

23 BY MR. PARRIS:

24 Q Do you know what the acceptable benzene level
25 for gas is?

1 MR. JAMES: Calls for speculation.

2 BY MR. PARRIS:

3 Q It is less than one part per million; isn't
4 it?

5 MR. JAMES: Calls for speculation. Outside the
6 scope.

7 THE WITNESS: No.

8 BY MR. PARRIS:

9 Q What is it?

10 A I mean --

11 Q Ten parts per million?

12 A I mean, we don't have a published limit in our
13 gas quality terms.

14 Q You don't what?

15 A We don't have a published limit in our gas
16 quality terms.

17 Q In your gas?

18 A Gas quality.

19 Q What's a published limit mean?

20 A It is where we publish our specifications, our
21 gas-quality specifications. So we don't have it -- it
22 is not written down as what our limit is for, you know,
23 accepting gas from suppliers.

24 Q Okay. So there's no standard in Southern
25 California Gas Company for the amount of benzene you

1 will accept from a supplier that is in -- it's a
2 constituent part of the natural gas matrix injected --

3 A So there is no published limit. If we do --
4 if we do find benzene at levels that we are concerned
5 about and our safety department brings it up, we will
6 apply -- you know, whatever the situation is, we will
7 tell our suppliers that this is a safety concern for
8 our public and we don't want the benzene in our gas.

9 Q Are you aware of that ever occurring?

10 A For one of our suppliers or for out-of-state
11 or --

12 Q Either.

13 A I mean, I think we have applied it for our
14 local suppliers. We have told them -- we have told
15 them, you know, we do want the benzene removed from the
16 gas.

17 Q Tell me everything you remember about that.

18 A I can't. It's -- I don't know the exact
19 numbers or what we told them or who we told.

20 Q Isn't it true safety didn't get involved until
21 it reached 210 parts per million?

22 A I don't know what you are talking about.

23 Q You were never aware that the safety
24 department at Southern California Gas Company did not
25 concern themselves with levels --

1 A Did not concern themselves?

2 Q -- of benzene until it reached 210 parts per
3 million?

4 A No.

5 Q That would be an excessively --

6 A Yes.

7 Q -- dangerous amount; wouldn't it?

8 A Right. So --

9 Q Wouldn't it?

10 A What?

11 Q Be an excessively dangerous amount.

12 MR. JAMES: Calls for speculation. Outside the
13 scope.

14 THE WITNESS: It -- it would be something that
15 safety would tell us what the limit should be. And if
16 they came up with that limit, they would specifically
17 tell us what it is and why we should be concerned about
18 it and in what situations.

19 BY MR. PARRIS:

20 Q So you don't have an understanding whether or
21 not 210 parts per million is something to be concerned
22 about?

23 A In the gas?

24 Q Yes.

25 A It depends on what happens in the gas. If the

1 gas is -- gas is usually in -- it depends on what we do
2 with the gas.

3 Q What does that mean?

4 A I mean, so benzene is completely destroyed
5 when it is -- I mean, benzene is combusted in the gas,
6 so it depends on, again, like, our employees and if
7 they are exposed to the gas and in what situations
8 they're in, then we would have something that would be
9 a concern to us for our employees.

10 Q Because they are exposed to it before it burns
11 up; right?

12 A Yes.

13 Q Is that right?

14 A Yes.

15 Q And 210 parts per million?

16 A It depends on what percentage of that -- it is
17 not 210 parts per million of benzene that they would be
18 exposed to. It depends on what percentage of the gas
19 that they would be exposed to. So --

20 Q I see what you are saying.

21 A Yes.

22 Q So it wouldn't matter to you?

23 MR. JAMES: Misstates her testimony.

24 THE WITNESS: No. It would matter to safety. It
25 would depend on what percentage they are exposed to,

1 and they would tell us if it is a concern or not. It
2 depends on what the situation is.

3 (The document referenced below was
4 marked Deposition Exhibit 8-1 for
5 identification and is appended hereto.)

6 BY MR. PARRIS:

7 Q Directing your attention to Exhibit 1 --

8 MR. KIESEL: It's 8-1.

9 BY MR. PARRIS:

10 Q Do you recognize Exhibit 8-1?

11 A It has my name on it. 2003.

12 Q It has your signature on it.

13 A It is 15 years ago. Yes.

14 Q Huh?

15 A It is 15 years ago, yes.

16 Q What is the Aliso Canyon low-pressure system?

17 A It is -- it is a system other than storage.

18 It is a low-pressure gas from a combination of
19 locations from our -- it might be off-gas from our
20 tanks and other -- I don't know exactly what goes
21 behind the low-pressure system.

22 I just know, you know, it is just gas in the
23 field at low pressure from our tank system. It is our
24 vapor recovery system. And then from -- it might be
25 something else, but I would be speculating.

1 MR. JAMES: I'm going to object to this line of
2 questioning on this document as outside the scope of
3 the PMQ notice.

4 BY MR. PARRIS:

5 Q Where it says "Subject: Gas quality of Aliso
6 Canyon low-pressure system," do you have an
7 understanding today of what you were referring to?

8 A Excuse me. Can you say it again?

9 Q Next to Subject on this memo, it says, "Gas
10 quality of Aliso Canyon low-pressure system." And this
11 is a memo from you to Marco -- who? How do you say his
12 name?

13 A Tachiquin.

14 Q Who is he?

15 A He's a person -- an employee at the Southern
16 California Gas Company. I don't recall at the time
17 what his function was.

18 Q Okay. But when you refer to the subject as
19 gas quality of Aliso Canyon low-pressure system, what
20 does that mean?

21 A That's -- that's gas from their low-pressure
22 systems, not the storage field. It is just a certain
23 location of Aliso Canyon, they have a low-pressure
24 system.

25 Q Okay. Do you know how the gas gets there?

1 A No, not exactly. It is just what we refer to
2 as the low-pressure and what feeds into them. It is
3 mainly what would be in their vapor recovery system.
4 It could be from a supply other than storage. It could
5 be at the time -- I don't know if there was a producer
6 behind there or not.

7 Q And you see where it says Conclusions?

8 A Uh-huh.

9 Q The number 2?

10 A Yes.

11 Q "The benzene level remains above 210 parts per
12 million" --

13 A Uh-huh.

14 Q -- "the action level where safety should be
15 consulted."

16 A Okay.

17 Q So is it your understanding that safety
18 doesn't even get consulted until it gets to 210 parts
19 per million?

20 A It depends on the --

21 MR. JAMES: Hold on.

22 THE WITNESS: Excuse me.

23 MR. JAMES: Objection. Misstates the document.

24 THE WITNESS: State it again.

25 MR. PARRIS: Read the question back, please.

1 (Record read as follows:

2 "Question: So is it your

3 understanding that safety doesn't even

4 get consulted until it gets to 210 parts

5 per million?")

6 THE WITNESS: I would say safety could be

7 consulted.

8 BY MR. PARRIS:

9 Q Isn't there a policy and procedure in the
10 company that is triggered at 210 parts per million?

11 A So there is for our employees, if they get --
12 if they see that level, they should not smell -- they
13 should not be performing the test we have them do.

14 Q They should not be exposed to that at all;
15 isn't that true?

16 A No, during --

17 Q Is that true, that the employee should not be
18 exposed to that level of benzene under any
19 circumstances?

20 A Okay. I'm talking about in the gas.

21 Q In the gas?

22 A Right. In the gas, then it is how they are
23 exposed to, they are not exposed to 100 percent of the
24 gas.

25 Q I understand that.

1 A Okay. So that's what I'm saying. The way
2 you -- it is in the gas, but they are not exposed to
3 100 percent of the gas and it is not -- you know, they
4 are not exposed to 210.)

5 Q The only way you can determine whether or not
6 a serious safety issue has been created is to have some
7 level of benzene levels for 100 percent of the gas;
8 right?

9 A Yes, but it would have to -- it would have to
10 be converted to what an employee actually is exposed
11 to.)

12 Q And anything over a trace amount is too much;
13 isn't that true?

14 MR. JAMES: Calls for speculation. Outside the
15 scope. Calls for expert testimony.

16 THE WITNESS: It would be something up to safety to
17 tell us in what situations that they are exposed to and
18 what the levels should be.

19 BY MR. PARRIS:

20 Q Is the --

21 A They-would have to -- so they would have to
22 tell us, like, if the gas is at this level in the
23 pipeline, can safety tell us, depending what the
24 employee is doing, you know, and how they are
25 exposed -- depending what they are doing, what they are

1 exposed to and what that level is actually, you know,
2 what they are exposed to in the air. It is not -- they
3 are not -- they are exposed to the air and traces of
4 this gas.

5 Q How much they are exposed to in the air is
6 going to change minute by minute -- isn't that true? --
7 if that gas is leaking out?

8 MR. JAMES: Outside the scope. Calls for
9 speculation. Calls for expert testimony.

10 THE WITNESS: So it would depend on -- you know, it
11 would depend on what they are doing. I'm not the
12 person to tell you.

13 BY MR. PARRIS:

14 Q Well, as the principal engineer of the
15 chemical and environmental department for the Southern
16 California Gas Company, are you telling the jury there
17 is no standard procedure or policy in the Southern
18 California Gas Company regulating the amount of benzene
19 that is acceptable to have in the gas that employees
20 may be exposed to?

21 A So I'm saying that there is a limit that
22 safety came up with, and this was for a particular
23 function that the employees were doing, that they -- so
24 they were -- whatever function that they were going to
25 do here, that it wouldn't be an issue if -- whatever

1 that function was. If it was, like, sniffing the gas
2 or whatever they were doing, they wouldn't be exposed
3 above whatever the OSHA -- whatever limit it is, based
4 on what they were doing, 210 in the gas wouldn't have
5 caused them a problem.

6 Q So are there different levels of benzene that
7 is acceptable in the gas -- in 100 percent of the gas
8 that does not trigger a response?

9 MR. JAMES: Vague and ambiguous. Outside the
10 scope. Calls for expert testimony.

11 BY MR. PARRIS:

12 Q Well, if you are not going to protect the
13 employees from this level of benzene in the gas that
14 they may be exposed to, who does?

15 MR. JAMES: Misstates her testimony. Outside the
16 scope.

17 THE WITNESS: So safety --

18 MR. JAMES: Calls for speculation.

19 THE WITNESS: Okay. So it depends on what the
20 function is. This limit came from one of their
21 functions. And if it is above this limit, then they
22 shouldn't perform whatever functions this limit came
23 from; right?

24 So safety should be consulted at this time.

25 So knowing they were going to do some function at the

1 system, then, you know, safety would be consulted, see
2 if they should perform whatever function they are not
3 supposed to perform that would cause them to be exposed
4 to -- what. Yes. Okay.

5 BY MR. PARRIS:

6 Q Isn't it true that they should never be
7 exposed to gas with that level of benzene in it?

8 MR. JAMES: Outside the scope. Calls for
9 speculation. Calls for expert testimony.

10 THE WITNESS: I don't know. That would be a safety
11 concern.

12 MR. JAMES: We have been going an hour and a half.
13 It is time for lunch.

14 MR. PARRIS: When we finish the document, then we
15 can go.

16 MR. JAMES: One more question.

17 MR. PARRIS: No. I'm going to finish the document.
18 Then we can go.

19 BY MR. PARRIS:

20 Q Would you look at page 2, please.

21 MR. JAMES: For the record, what constitutes page 2
22 here? Since, one, we don't have Bates labeling on
23 here, it has been cut off, and it seems to be a copy.

24 MR. PARRIS: If you would look at the top, it says
25 P-a-g-e 2.

1 MS. OLIVER: And the Bates numbers did not print
2 properly through the copier, that's all.

3 MR. PARRIS: This is the Bates --

4 MR. JAMES: Can we confirm this is the back page --

5 MS. OLIVER: No, it is part of it. It's part of
6 the document as it was produced.

7 MR. PARRIS: And the Bates number would be, if it
8 had made it through the copier, SCG01843842.

9 MS. OLIVER: The last page? First page?

10 MR. PARRIS: First page is 01, last page is 42.

11 BY MR. PARRIS:

12 Q Do you see the first paragraph there
13 underneath the column where it says -- you wrote this,
14 I believe?

15 A I did, but I don't recall.

16 Q One of the previous quality concerns was the
17 benzene level. Benzene was measured at 447 parts per
18 million on February 27. However, this is using old
19 benzene standard, expiration date 8/4/01 at the EAC.

20 What's the EAC?

21 A That's where I work, the Engineering Analysis
22 Center.

23 Q So you do have standards?

24 A We did have standards, yes.

25 Q Did you get rid of your benzene standards?

1 A They expired.

2 Q How did they expire?

3 A They -- when we purchased them, they have an
4 expiration date.

5 Q Where do you purchase them?

6 A We purchase them from various gas vendors.

7 Q Purchase what?

8 A Standards.

9 Q Explain that to me.

10 A There's a -- we purchase a cylinder that has
11 benzene in it at a certain concentration and --

12 Q Why do you do that?

13 A We do that so we know how accurate it is. We
14 will run it through our gas chromatograph.

15 Q That's so you can calibrate the gas
16 chromatograph; isn't that right?

17 A Correct. So we will run it through our -- we
18 will run the calibration gas through a gas
19 chromatograph.

20 Q And then it says:

21 "Since then, we have obtained new
22 benzene standards, and the benzene level
23 of the current sample was at 220 parts
24 per million."

25 A Uh-huh.

1 Q So I'm having trouble understanding that. You
2 mean you purchase a different canister of benzene and
3 then your test protocol changes?

4 A Right, because that standard has expired. It
5 has been expired for two years.

6 Q Why does it expire?

7 A The gas vendor will tell us how good that
8 benzene is.

9 Q Okay.

10 A Or how good that benzene standard is. How --
11 it's not -- I'm not the person that puts the expiration
12 date on it. So if you are asking why does it expire,
13 we purchase a standard. However they mix it and how --
14 what they are comfortable with in telling us how long
15 it lasts, they will tell us what the expiration date
16 is.

17 Q So at least back in 2003, you were testing for
18 benzene with expired -- with an expired canister;
19 right?

20 MR. JAMES: Misstates her testimony. Outside the
21 scope.

22 THE WITNESS: I don't know why we were doing it. I
23 don't recall.

24 BY MR. PARRIS:

25 Q Isn't that -- isn't this what this means to

1 you?

2 A Yes, that's what it says here. So we did not
3 have -- obviously, we did not have a standard -- a
4 fresh standard.

5 Q And then it says:

6 "To verify that the benzene level
7 is reduced through the chiller, the
8 benzene was measured downstream of the
9 chiller to be at 122 parts per million."

10 A Correct.

11 Q What does that mean to you?

12 A So there's a chiller -- there's a chiller at
13 this location, and we were measuring at the meters. So
14 the meter is obviously -- the meter is downstream of
15 the chiller, and we were measuring at the meter before
16 it leaves our plant; right? Before it leaves -- before
17 it leaves into -- before the low-pressure system enters
18 our system, it goes through a chiller first.

19 Q Okay.

20 A Yes.

21 Q Does all the gas coming out of Aliso Canyon go
22 through a chiller?

23 A No. It's the gas that goes through the
24 low-pressure system.

25 Q Is the only gas that goes through the chiller?

1 A For this chiller, it's for the low-pressure
2 system.

3 Q Are you aware of using a chiller for any other
4 gas leaving Aliso Canyon?

5 A No. It would be -- well, it would be whatever
6 gas goes through this -- the low-pressure system. So
7 it would only be whatever is in the system that would
8 be going through.

9 Q It would be --

10 A It would be whatever gas they put through.

11 Q -- Plant 3402; right?

12 A Plant 3402, where do you see that?

13 Q So it says the gas samples were collected in
14 stainless steel cylinders and Tedlar bags; is that
15 right?

16 A Yes.

17 Q And then taken to your department, EAC, for
18 hydrocarbon analysis on the Agilent 6890 gas
19 chromatograph?

20 A Yes.

21 Q That's different than the 5000 series model;
22 right?

23 A Correct. These are different. We have
24 different analyzers at our lab that will -- that we use
25 in our laboratory.

1 Q And they give you different results; don't
2 they?

3 A They analyze -- they also analyze for
4 hydrocarbon. This is an analyzer that was there in
5 2003, but we don't have that anymore.

6 Q So when you take the stainless steel cylinders
7 to the lab, do you do anything with those cylinders
8 before you test for anything? Do you heat them?

9 A No.

10 Q You don't?

11 A Depends on -- depends -- okay. So not
12 specifically unless we are asked to do it.

13 Q Who would ask?

14 A It would be the requester, so it was Marco.

15 Q The reason you heat the cylinder before you
16 run through the gas chromatograph is because oftentimes
17 what you are testing for will adhere to the sides of
18 the canister. Isn't that true?

19 A Not necessarily. This is stainless steel.

20 Q That's correct.

21 A So we try to test the gas at the same
22 temperatures that we collect it at; right? So if
23 it's -- you know, if we are at the site -- I didn't
24 write down the temperature, but we'll test it -- you
25 know, it is room temperature in the lab. So we will

1 just test the gas without heating unless it is
2 specifically asked for to heat it.

3 Q With the same assumption that that's the same
4 temperature at the wellhead or wherever you pulled it?

5 A It would be something similar, not exact. It
6 would be a similar temperature.

7 Q But where you took it was outside, and you are
8 talking about room temperature in the lab; right?

9 MR. JAMES: Calls for speculation. Outside the
10 scope.

11 THE WITNESS: So I don't have the temperature. I
12 wouldn't know what it was.

13 BY MR. PARRIS:

14 Q So isn't it true --

15 A But we don't --

16 Q -- that not much was done to make certain that
17 you are testing at the same temperature?

18 MR. JAMES: Calls for speculation. Outside the
19 scope. Assumes facts not in evidence.

20 BY MR. PARRIS:

21 Q Isn't that true?

22 A No. We were testing in the lab. Our lab is
23 not exactly that cold. It would be room temperature.

24 Q That's right.

25 A Right.

1 Q And out in the field, it's --

2 A It could be anything.

3 Q -- colder or hotter; right?

4 A No. It could be, but it would be at our meter
5 site. It would be -- by the time it travels to where
6 we are testing, it would be close to -- I mean, we
7 would find the temperature at the meter, but it would
8 be close to, you know, whatever it was, 60 degrees is
9 what our -- what we would say.

10 Q Okay.

11 A Normally. Yeah.

12 Q I'm just asking.

13 A Normal is 60. Yeah. So our lab temperature
14 is higher than 60 degrees.

15 Q So -- but let's get back to heating the
16 canister --

17 A Okay.

18 Q -- before you test whatever gas you are
19 testing for. Is there ever a time you do that?

20 MR. JAMES: Calls for speculation. Outside the
21 scope.

22 THE WITNESS: Like I said, it depends on if we were
23 requested to do it, we would do it. And it depends on
24 what they were -- what we were testing at the time,
25 however the requester wants it.

1 BY MR. PARRIS:

2 Q Do you remember ever being requested to heat
3 the canister before you tested it?

4 A Not me personally, no.

5 Q I'm curious. Aren't they relying on you to do
6 the proper test?

7 A Well, it depends on what they are looking for,
8 right. It depends on why the requester wants us to
9 heat the gas or why they want us to test it.

10 Q What do you do to make certain you are not
11 testing for a gas that adheres to the sides of the
12 stainless steel canister?

13 MR. JAMES: Outside the scope.

14 BY MR. PARRIS:

15 Q What do you call that when that happens?

16 A We don't because it is stainless steel. So we
17 don't usually find -- unless it is a liquid -- are you
18 talking about condensate onto the --

19 Q No. I'm talking about whatever you are
20 testing for adhering to the sides of the stainless
21 steel canister. Is it your testimony that the --

22 A What compound are you talking about?

23 Q Any compound --

24 A Oh.

25 Q -- that you might be testing for. I want to

1 know what your procedures are in the lab.

2 A So we -- so that's -- so we test for -- you
3 know, for hydrocarbons using stainless steel and for --

4 Q Do you know --

5 A Yes.

6 Q Do you know whether or not the hydrocarbons
7 adhere to the sides of the stainless steel canister?

8 A It depends on which hydrocarbons you are
9 looking for and if it is above or below the dew point.
10 If it's -- you know, if that hydrocarbon dew point of a
11 gas is -- if the hydrocarbon dew point temperature,
12 say, is above the 60 or 70 degrees, then we would -- if
13 we were concerned about what would drop out or what was
14 in the gas, we would -- it would depend on the
15 situation. If the difference is higher, lower, then we
16 would perform the tests if that was the request.

17 Q Tell me a situation where you were concerned
18 in the lab that your lowering the test results by using
19 the stainless steel container --

20 A We don't.

21 Q -- it sticks to the side?

22 A I don't recall. I don't recall.

23 MR. JAMES: Outside the scope.

24 BY MR. PARRIS:

25 Q That is not a consideration that you ever had;

1 is that right?

2 A It would depend on the situation -- it would
3 depend on the requester and what the situation is. We
4 just don't do that.

5 Q Your procedures -- your procedures don't
6 depend on anything other than what they are. Are there
7 any procedures you follow as a matter of course to not
8 use stainless steel canisters when testing for certain
9 volatile chemicals?

10 MR. JAMES: Outside the scope.

11 THE WITNESS: If they called us to do the
12 procedure, we would follow the procedure. If it says
13 not to test in a stainless steel cylinder, then we
14 wouldn't. It would be whatever the procedure would
15 call for.

16 BY MR. PARRIS:

17 Q I'm asking, are you aware of any procedures
18 that you use in your lab, just as a matter of course,
19 you know not to use a stainless steel container without
20 adjusting for a lower measurement?

21 A It would just depend on what the situation
22 was, what the pressure of the gas was. Gas; right?

23 Q Yes.

24 MR. JAMES: All right.

25 THE WITNESS: It just depends on what the situation

1 is.

2 MR. JAMES: Time for lunch.

3 BY MR. PARRIS:

4 Q You are not aware of such a procedure?

5 A I can't tell you off the top of my head. I
6 don't know.

7 MR. JAMES: Time for lunch.

8 MR. PARRIS: I'm not done with this line of
9 questioning.

10 MR. JAMES: We have gone close to two hours. It is
11 time for lunch.

12 MR. PARRIS: No. We already had a break. We had a
13 break after one hour.

14 MR. JAMES: I think the witness is ready for lunch.

15 THE WITNESS: I'm thirsty.

16 MR. PARRIS: Counsel, I want to finish with this
17 document. You do whatever you want to do, but you know
18 the rules.

19 MR. JAMES: Are you ready?

20 I think the witness is ready for a break.

21 MR. PARRIS: I can appreciate the witness is ready
22 for a break, and I can also appreciate the moment she
23 gets out of this chair she is going to talk to you
24 about this line of questioning. You know it, I know
25 it, so let's quit playing.

1 MR. JAMES: Are you ready for a break?

2 THE WITNESS: Yes.

3 MR. JAMES: Take off the thing.

4 MR. PARRIS: You are doing it over my objection.

5 MR. JAMES: Fine. We will be back in an hour.

6 VIDEO OPERATOR BROWN: Time is 12:26. We are going
7 off the record.

8 (Lunch recess taken.)

9 VIDEO OPERATOR BROWN: The time is now 1:38. Back
10 on record.

11

12 EXAMINATION

13 BY MS. WIEMAN:

14 Q Good afternoon, Ms. Lew. My name is Catherine
15 Wieman. I'm representing one of the plaintiffs in this
16 case, the People of the State of California, acting by
17 and through the Attorney General, both in his
18 independent capacity and on behalf of the California
19 Air Resources Board.

20 I understand that Mr. Parris is going to take
21 a little break, so I'm going to jump in and ask you
22 some questions for a little bit this afternoon. And
23 I'm going to rewind a little bit to something that we
24 didn't cover yet today.

25 If I do duplicate some of the questions I

1 ask -- I'm going to try to minimize duplication, but I
2 do want to clarify some of the questions you got this
3 morning and some of your answers just to make sure I
4 understood them, but I will try and minimize any
5 duplication.

6 Is it your understanding that you are here
7 today to testify about the contents of the gas stored
8 at the Aliso Canyon facility in the week before the
9 incident that occurred on October 23rd, 2015, including
10 but not limited to the constituents and/or components
11 of the gas, the quantities of each constituent and
12 total quantities?

13 A Yes.

14 Q Okay. And is it also your understanding that
15 you are here to testify about the contents of the gas
16 stored at the Aliso Canyon facility during the five
17 years prior to that date, October 23rd, 2015?

18 A Yes.

19 Q Okay. I would give you a copy of the PMQ
20 notice, but mine is written on, so I can't do that.

21 So I wanted to back up a little bit. How long
22 have you been employed with SoCalGas?

23 A Over 28 years.

24 Q And you testified that you are currently --
25 oh, sorry.

1 A Doing my math. Twenty-eight, going on 29,
2 yes.

3 Q That's a long time.

4 And you are currently a principal engineer?

5 A Yes.

6 Q What are your job duties and responsibilities
7 as a principal engineer?

8 A As a principal engineer in -- where I work in
9 the Engineering Analysis Center, chemical section, I'm
10 in charge of the policies for gas quality, what the
11 limit should be, what the monitoring should be done,
12 what frequency it should be tested at, and how it
13 should be enforced.

14 Q Okay. And it is called the engineering
15 chemical section?

16 A Engineering Analysis Center.

17 Q Okay.

18 A And then the section that I work under is the
19 chemical and environmental section.

20 Q Okay. And do your duties and responsibilities
21 extend beyond the gas that's stored at Aliso Canyon?

22 A Yes. It is the gas throughout our system.

23 Q Okay. And how long have you been a principal
24 engineer in the -- I want to get it right -- the
25 chemical and environmental -- center?

1 A Section.

2 Q Section. Thank you. I'll ask that again.

3 How long have you been a principal engineer

4 with the chemical and environmental section?

5 A Approximately over ten years.

6 Q Okay. And what -- go ahead.

7 A And then prior to that, still in the same
8 function but just, you know, lower titles like senior
9 engineer or engineer.

10 Q So have you always been within the Engineering
11 Analysis Center?

12 A No. I've been in the Engineering Analysis
13 Center for 24 years. Prior to that I was in a
14 different group. I was in the measurement and
15 regulation group as part of design engineering or -- it
16 was under gas engineering.

17 Q Okay.

18 A And then prior to that I was -- I started as
19 an associate engineer in the quality assurance group,
20 process engineering, under technical services. So
21 under the engineering department.

22 Q And where did you work before you started
23 working with SoCalGas almost 29 years ago?

24 A Prior to that I was at TRW before. Yes.

25 Q And what -- do you have a college degree?

1 A Yes.

2 Q In --

3 A No. I have a bachelor of science --

4 Q Okay.

5 A -- in chemical engineering.

6 Q In chemical engineering.

7 Do you have any advanced degrees?

8 A No.

9 Q Okay. Going back to your current role as a
10 principal engineer, do you oversee other staff in the
11 chemical and environmental section?

12 A No, I don't.

13 Q Okay.

14 A I don't have direct reports.

15 Q Okay. You mentioned earlier your supervisor
16 is -- I can't remember his name.

17 A Oh. My -- our team lead?

18 Q Yeah.

19 A Shahid Razzak.

20 Q He was your team lead also at the time of the
21 leak in October 2015?

22 A Yes.

23 Q Okay. I know you described kind of big
24 picture what your current job responsibilities and
25 duties are. Could you -- let me ask this. Do your

1 current responsibilities involve monitoring the
2 composition of the gas at the Aliso Canyon field?

3 A So I don't do day-to-day monitoring.

4 Q Okay.

5 A Somebody else does that. But we do have -- we
6 do have set up in our measurement -- we do pull the
7 data, and then it is reviewed by our measurement
8 department. They do that.

9 Q All right.

10 A And then if that's an issue, they might bring
11 it up to us in a question like "Is there something
12 wrong with the analyzer? Is this analysis correct?"
13 And then we will follow up on it.

14 Q Okay. And I'm going to ask the same or
15 similar question about October 2015. Did your job
16 duties and responsibilities at the time of the leak on
17 or around October 23rd, 2015, involve monitoring the
18 composition of gas at the Aliso Canyon facility?

19 A It's the same thing. The monitor was always
20 there.

21 Q Okay.

22 A Even on that day, it was operating.

23 Q Okay. What did you do to prepare for your
24 deposition today?

25 A Well, the only thing I was asked to prepare

1 was the data that I provided for the five years prior
2 to October 23rd, and then the week; right? You want
3 hourly averages, the week before the October 23rd.

4 Q So you provided that data?

5 A Yes.

6 Q What did you do to gather that data and
7 provide it?

8 A Downloaded it from our measurement-collection
9 system.

10 Q And you were talking a little bit about that
11 earlier, I believe, that the data -- after a certain
12 period of time, 30 days or so, the data goes over to
13 your measurement-collection services?

14 A Oh, no. So -- well, the data resides on the
15 gas chromatograph, but the measurement-collection
16 system will pull -- I'm not too sure what time it pulls
17 it at, but it should be pulling on a daily basis the
18 data. And it only collects, like I said before, the
19 daily average, the -- and the hourly average.

20 Q And so that every-12-minute data doesn't get
21 stored; correct?

22 A It is not stored in our measurement-collection
23 system. It is stored, you know, at the site on the gas
24 chromatograph.

25 Q And I may have misunderstood your testimony

1 earlier, so I apologize.

2 Does the gas chromatograph -- how long does
3 the data stay on the gas chromatograph?

4 A On the gas chromatograph itself, I'm doing an
5 estimate. I think it is like 30 days' worth.

6 Q Okay. So the 12-minute data would still be on
7 that device for the last 30 days potentially? Assuming
8 your 30-day -- assuming that's correct, the
9 every-12-minute data would still be on the device for
10 that 30-day period?

11 A Yes.

12 Q And then what happens to the data?

13 A It is rewritten over with the current data.

14 Q Okay. So all of it is maintained --

15 A It just kind of rolls off; right.

16 Q So all that is maintained after that, you
17 know, 30-day-or-so period is the hourly data and the
18 daily data?

19 A Right. That data, we will save to our
20 measurement-collection system.

21 Q Okay. So you said that to provide the hourly
22 and daily data we had requested, you just downloaded
23 that from the measurement-collection system and then
24 provided it?

25 A Yes. I just downloaded it and sent it. I

1 didn't -- you know -- I emailed over that.

2 Q Is there any other data in the
3 measurement-collection system relating to the gas
4 chromatograms?

5 A Yes. So besides that data, we do have the
6 calibration. So the GC is calibrated once a day, so we
7 will have that data there also.

8 Q Okay. And just so I'm clear, how many gas
9 chromatograms are there at the Aliso Canyon facility?

10 A Gas chromatographs?

11 Q Yes. Did I say that wrong? Yes. Sorry.
12 Thank you.

13 A So we have two gas chromatographs for the
14 injection or the gas coming into the field, and then we
15 have two gas chromatographs on withdrawal, the gas
16 exiting the field for storage.

17 Q Okay. And you mentioned the chromatograph is
18 calibrated once per day. Is each one of those four
19 chromatographs calibrated once per day?

20 A Yes.

21 Q Does each one have a set time at which it is
22 calibrated?

23 A Yes. So I don't know specifically what time,
24 but it is programmed in to calibrate once a day at a
25 certain time.

1 Q Okay. Is the calibration reflected in the
2 data you downloaded, or is that maintained -- the
3 calibration data maintained separately?

4 A No. The calibration data resides separately.

5 Q Okay. All right. I'm going to take a little
6 bit of a step back to make sure I understand how gas
7 comes into and out of the facility and how that ties in
8 to where -- basically where you said it is tested. So
9 if you don't know the answer to my question, definitely
10 just let me know. I'm trying to keep it tailored to
11 the PMQ.

12 So you said there are two gas chromatographs
13 on -- basically as the gas is coming in and two as it
14 is exiting. Where are the two chromatographs located,
15 if you know, that are on the injection side of things
16 when the gas is coming into the facility?

17 A Okay. I don't know exactly where.

18 Q Okay.

19 A I just know, like, the names of the gas
20 chromatograph.

21 Q Okay.

22 A That's how I selected them.

23 Q Okay. And what are their names?

24 A So if you -- it is -- every injection will
25 have -- we will call one the KVS.

1 Q KV, as in Victor, S?

2 A KVS. Yes, K Victor S.

3 The other one, we will call it the TDC.

4 Q Okay. Those are the two on the injection
5 side?

6 A Correct.

7 Q And then what are the two called on the
8 withdrawal side?

9 A On the withdrawal side, we have one called
10 Dehy 1 and the other one is Dehy 2.

11 Q And besides their names, do you have any
12 knowledge of where any of these chromatographs is
13 located at the facility?

14 A Not exactly. I can't tell you.

15 Q Do you have a general idea? You said not
16 exactly.

17 A Yeah. Well, like I said before, it is, you
18 know, at the outlet of the plant where the meter -- the
19 meters are. Yes.

20 Q Okay.

21 A For the dehydration plant.

22 Q Okay. And how about the KVS and the TDC, the
23 injection ones, do you have a general sense of where
24 those are located?

25 A No.

1 Q Are there any gas chromatographs located
2 anywhere else at the Aliso Canyon facility that you are
3 aware of?

4 A So the other gas chromatograph is the
5 low-pressure system at 4613. That would be the meter.
6 But that's not storage gas, what's being injected or
7 stored and withdrawn.

8 Q I know you covered this a little bit this
9 morning, but I would love to just go back through what
10 each of the gas chromatographs tests. I'm going to
11 start with some basic questions about how often they
12 are monitoring, which I think you have answered, and
13 then talk about what they test to make sure I
14 understood your testimony correctly.

15 Are the gas -- all four of the gas
16 chromatographs, are they operated 24 hours a day, seven
17 days a week, 365 days a year?

18 A Yes. It is continuously on.

19 Q Okay. And you said earlier that they are
20 testing for -- and correct me if I'm wrong. So the
21 online or -- were you calling -- were you referring to
22 continuous testing as online testing earlier?

23 A Yes. It is the same thing. The gas
24 chromatograph is online --

25 Q Okay.

1 A -- and testing.

2 Q Okay. I just wanted to make sure I
3 understood. I thought you were using those terms
4 interchangeably.

5 So they are testing for CO2?

6 A Yes. Carbon dioxide.

7 Q Yes.

8 A Yes.

9 Q Okay. Nitrogen?

10 A Yes.

11 Q Hydrocarbons?

12 A Well, not -- so that was, I guess, the
13 confusion. I kind of called it hydrocarbon GC, but it
14 is actually testing for the hydrocarbon compounds.

15 Q Okay.

16 A So they were what you have -- I don't know if
17 you have it all written down: Methane, ethane,
18 propane. There's isobutane, normal butane, isopentane,
19 normal pentane, and hexanes, hexane plus, which we call
20 C6+.

21 Q Okay. And what is in the C6+ category?

22 A C6+ is mainly hexanes. And then after
23 hexanes -- like maybe over 50 percent would be hexanes,
24 and then there would be -- maybe a quarter of that
25 would be heptanes and then octanes.

1 And then if there's any other compounds that
2 would have, you know, a hydrocarbon, that would be --
3 that has more than six carbons, so C6+, so whatever
4 compounds that might be in it. It would just be a
5 trace amount, though.

6 Q The blank look on my face is because science
7 is not my strong suit.

8 So Mr. Parris was asking you about benzene, so
9 I was curious, if benzene were present, would it be in
10 that C6+ category?

11 A Yes. If it was present at -- if it was
12 present, it would be included in that C6+.

13 Q Okay. So that's C6 --

14 A At, like, a really trace amount. Yes.

15 Q Okay. So the chromatographs are testing for
16 carbon, CO2, nitrogen, the various hydrocarbons you
17 just listed?

18 A Yes.

19 Q What else are they continuously monitoring
20 for?

21 A Well, that's what it would actually analyze as
22 far as those compounds.

23 Q Okay. You said it actually analyzes for those
24 compounds?

25 A Right. So it analyzes for each of those

1 compounds. And then when you say what it monitors for,
2 the gas chromatograph will actually take that analysis
3 and calculate what the -- the high-heating value is and
4 also the specific gravity.

5 Q Okay. You were talking earlier a little bit
6 about -- with Mr. Parris about out-of-state gas coming
7 into the facility, and you were talking about testing
8 at borders, I believe. Was that the border of the
9 facility or the border of the state?

10 A Oh, okay. So most of the gas that we get into
11 SoCalGas is from out of state, and it is actually at
12 the border of -- like at the border of -- the
13 Arizona/California border.

14 Q Sure.

15 A Yes.

16 Q Okay.

17 A And then we also -- as it comes through the
18 borders, it depends on where -- it comes across the
19 border, but then it is turns out -- there is more
20 than -- there is, like, maybe five locations where the
21 out-of-state gas comes through. So they are, you know,
22 in the desert or up north.

23 Q And so the testing -- you were talking about
24 that there is some testing done at that point. The
25 total sulfur, I believe you said, is tested at the

1 border points?

2 A Yes. So we -- so as it comes in, we monitor
3 for sulfur to determine what the -- what is in the gas
4 in terms of odorant, and then we decide then and there
5 how much odorant we should be supplementally adding to
6 that. The gas might be odorized, but we might have to
7 add a little -- you know, we might have to add more to
8 it so that it could be detectable.

9 Q Okay. And then did you -- is the gas also
10 tested for total sulfur when it is coming into the
11 facility?

12 A Into Aliso?

13 Q Into Aliso Canyon, yes.

14 A No.

15 Q Okay.

16 A So, you know, as it comes through the border
17 and goes into Aliso.

18 Q I may have misheard your testimony earlier, I
19 apologize. Did SoCalGas spot-test for total sulfur at
20 the Aliso Canyon facility?

21 A Right. So if we do do testing there, we will
22 take a spot-test, like we will grab a sample and we'll
23 bring it back to the lab to analyze it for sulfur
24 compounds.

25 Q Okay. If gas is coming into the -- so the two

1 gas chromatographs that monitor the gas coming into the
2 facility, are there standards the gas has to meet to
3 come into the facility?

4 MR. JAMES: Vague and ambiguous.

5 BY MS. WIEMAN:

6 Q You can answer if you can.

7 A Oh. We only -- we monitor at the border
8 stations to test to see if it meets our specifications.
9 We monitor at the supply points.

10 Q Okay. Not at -- not when it is coming into
11 the facility?

12 MR. JAMES: Are you referring only to odorant
13 standards or --

14 MS. WIEMAN: I was actually asking a broader
15 question. I can break it down, if that's helpful.

16 MR. JAMES: I sense her confusion.

17 BY MS. WIEMAN:

18 Q I was asking a broader question. So all --

19 A Okay.

20 MS. WIEMAN: Thank you, Collie.

21 BY MS. WIEMAN:

22 Q So all of the -- all of the constituents that
23 are monitored continually by the gas chromatogram, so
24 you testified that as the gas is coming into the
25 facility, there's two gas chromatographs -- I said it

1 wrong again -- gas chromatographs there that are
2 monitoring the gas that is coming in.

3 Are there specific standards that that gas has
4 to meet before it can come into the facility?

5 A It should be the same as the gas that we get
6 at the borders. So I don't do -- you know, I said I
7 don't just do the actual monitoring. It would be
8 someone at the storage facility, like, in their little
9 control room that monitors that data.

10 Q Okay. Regarding the spot-testing for --
11 actually, I'll ask a different question.

12 You mentioned that SoCalGas sometimes
13 spot-tests the gas at Aliso Canyon for sulfur
14 compounds. Do you do -- does SoCalGas do any other
15 spot-testing of the gas at Aliso Canyon?

16 A First -- well, again, it depends on if we are
17 requested to do spot-testing, we do it. But what we --
18 what we do -- what we do more often is the -- we are
19 set up to do like the annual, every year we will test
20 for the sulfur. But for other testing, it's based on
21 special requests.

22 Q In the five years leading up to the leak in
23 October 2015, did SoCalGas do any spot-testing of the
24 gas at the Aliso Canyon facility for -- we will start
25 with sulfur compounds, total sulfur?

1 A As far as I recall, we provided what was
2 tested for the past five years, from 2015. That's all
3 we had.

4 Q Okay. Do you know whether -- off the top of
5 your head, whether there was any spot-testing done --

6 A I --

7 Q -- during that five-year period?

8 A For what?

9 Q For total sulfur.

10 A Oh, for total sulfur? No, I mean, what we
11 provided you is what we had, yes.

12 Q Okay. Do you know whether there was any
13 testing done for any other constituents, spot-testing
14 done during that five-year period for any other
15 constituents?

16 A For that -- oh, for any other constituents?

17 Q Uh-huh.

18 A At the storage location?

19 Q Uh-huh.

20 A Hmm. So -- because I'm only aware of what I
21 look at in terms of gas quality. So as far as I know,
22 is -- we provided all -- you know, when you asked for
23 the constituent testing, that's all we had.

24 Q And what specifically do you look at in terms
25 of gas quality?

1 A We will look at the heating value to make sure
2 it falls within a certain range. The Wobbe number,
3 which we talked about before. We will look at the
4 carbon dioxide to make sure it is not above 3 percent.
5 We look at the total inerts, the CO2 and nitrogen, to
6 make sure it is less than 4 percent. I think that's all
7 we can tell from the analyzer.

8 Q Okay. So is it your testimony -- and I'm just
9 trying to make sure I understand -- you are aware of
10 the data that you typically look at to determine gas
11 quality, but you are not aware of whether any other
12 spot-testing for any other constituents was done in the
13 storage field during the five years leading up to the
14 leak in October 2015?

15 A I'm not directly aware of it.

16 Q Are you indirectly aware of it?

17 A I mean, when I searched for it -- when we had
18 searched for it, this is what we had.

19 Q I'm not sure I understand your answer.

20 A Because when we were, like, looking for --
21 when we were looking for gas, you know, from the field,
22 and that's -- we only had -- you know, we had access to
23 the measurement-collection system. For our
24 spot-testing we just had, you know, the sulfur testing.

25 Q Okay. If spot-testing were done during the

1 five years leading up to the leak in October of 2015,
2 would that data be maintained in the
3 measurement-collection system?

4 A No, it wouldn't. The only thing that resides
5 in the measurement-collection system is what was from
6 the gas chromatographs.

7 Q Okay.

8 A Our spot-testing is what we do, and it
9 wouldn't be in there.

10 Q Where would it be?

11 A It would just be reports that we would -- we
12 would have the reports, but then we would send the
13 reports to whoever the requester was. So we have the
14 reports. We try to keep it -- for now we try to keep
15 it electronically or we keep it on -- if we have our
16 copy still, it would be a hard copy.

17 Q And is that information you looked for before
18 this deposition?

19 A Yes. So we looked through our -- we looked
20 through the files electronically to see what -- you
21 know, what would be there for that time period.

22 And for the hard copies, I just asked, like --
23 I asked -- you know, I looked through our files, and I
24 asked particular engineers who I knew would have, like,
25 the sulfur testing data.

1 Q And everything you found was produced?

2 A Yes.

3 Q Okay. If spot-testing had been done in the
4 five years prior to the leak in October of 2015 for any
5 constituent, I'm just asking a broad question, would
6 that have come through the lab that you work in?

7 A If it was -- well, if there was spot-testing
8 on the gas itself?

9 Q Uh-huh.

10 A Yeah. So it would be through our lab that we
11 did it.

12 Q Okay. And does the lab staff actually go out
13 and collect the sample and do the testing in the field
14 if it is ever requested?

15 A Yes.

16 Q Okay.

17 A So we provide our lab technicians, and they
18 will go out and sample. And if they are able to test
19 on site, then they will test on site, but they will
20 bring the reports back to us to review and approve.

21 Q And in the five years -- I just want to make
22 sure I understand your testimony.

23 A Yeah.

24 Q In the five years leading up to the leak, are
25 you aware that any spot-test -- whether any

1 spot-testing was done of the gas in the storage field
2 at Aliso Canyon for any constituent?

3 A For any constituent?

4 Q Uh-huh.

5 A I'm not --

6 MR. JAMES: Asked and answered.

7 THE WITNESS: I don't --

8 MR. JAMES: You can answer.

9 BY MS. WIEMAN:

10 Q You can still answer it.

11 A Oh, okay.

12 So, well, for me personally aware of it, I
13 don't know. So, I mean, if we did get a request and it
14 was analyzed, it would have been done, but it would --
15 it would show up electronically on our -- you know, on
16 our files in the hard copies.

17 Q So you would have found the information when
18 you were --

19 A Right.

20 Q -- looking through the files?

21 A If I was looking for compounds that we -- you
22 know, the hydrocarbon compounds, I would have found it
23 on there.

24 Q Okay. Do you know whether SoCalGas ever
25 tested -- I'll ask a different question.

1 In the five years leading up to the leak in
2 October of 2015, do you know whether SoCalGas ever did
3 any testing to determine if there are any naturally
4 occurring constituents in the storage reservoir at the
5 facility?

6 A I don't understand that question.

7 Q If -- I'm trying to figure out what the role
8 of the lab is, but let me ask you this: Are you aware
9 of any testing being done to determine whether there's
10 any just naturally occurring constituents or compounds
11 in the storage reservoir? Besides the things that are
12 continually being monitored for.

13 A You have to be more specific about what
14 constituents you are looking for --

15 Q Any constituents.

16 A -- and that we are able to test for that.

17 Q Any constituents. Was there ever any testing
18 of -- you know, you testified that the gas
19 chromatographs are located --

20 A Right.

21 Q -- on the incoming and outgoing meters. Is
22 there any testing that you are aware of -- at least in
23 the five years leading up to the leak, was there any
24 testing done of the reservoir --

25 A The reservoir.

1 Q -- itself?

2 A So you are talking about the storage.

3 MR. JAMES: That's a little vague and ambiguous in
4 there.

5 BY MS. WIEMAN:

6 Q If you can answer.

7 A Yeah. If we -- we are talking about storage
8 gas; right?

9 Q Uh-huh.

10 A I'm saying the gas that comes out. That's all
11 I know of what we have actually tested for -- I mean,
12 besides -- well, the other thing is for moisture, we do
13 moisture testing, or there's moisture analyzers.
14 That's the only other constituent, I don't know if you
15 call it a parameter, that we test for.

16 Q Where the moisture -- where is the moisture
17 tested for?

18 A The moisture is tested at the withdrawal gas,
19 on the outlet --

20 Q Okay.

21 A -- to make sure that it is dry before it comes
22 into our system.

23 Q Okay. Is moisture-tested for anywhere else at
24 the facility?

25 A I believe we have a moisture analyzer -- or we

1 used to. I haven't been there lately, but we used to
2 have an analyzer upstream of our dehy plant to see what
3 the moisture level is going in to determine, you know,
4 what the efficiency or how the performance of the
5 dehydration plant is.

6 Q And is moisture monitored for continuously?

7 A Yes. That's a continuous analyzer.

8 Q Okay. When you were talking with Mr. Parris
9 earlier, I think you testified that total sulfur
10 includes both H₂S and total mercaptans and other
11 sulfurs; is that correct?

12 A Yes.

13 Q Okay. When -- I am missing a piece, so let me
14 see if I can connect the dots -- you can help me
15 connect the dots. When are mercaptans added to the gas
16 by SoCalGas?

17 A We add it at the -- the border stations and
18 the supply points. So when we monitor it and -- we
19 have a supplemental odorization rate, so depending upon
20 what the amount of mercaptans that we test for, the
21 total odorant, and based on that level we have
22 guidelines. And based on that, that's when we add the
23 tertiary butyl mercaptan. It is an odorant. It's 50
24 percent tertiary butyl mercaptan and 50 percent
25 thiophene. So at that point we determine how much

1 odorant to add at the border.

2 Q Okay. Is that the only point at which
3 SoCalGas adds mercaptan?

4 A We also add it at our local suppliers, but we
5 don't monitor there. We just -- we add the full
6 amount. We don't do supplemental. So our local
7 suppliers don't normally have -- they usually have no
8 mercaptans, you know, no other sulfur compounds, so we
9 just add the full amount of odorant that -- that we are
10 supposed to add there when there's nothing in the gas
11 in terms of sulfur compounds.

12 And then at the storage fields we will follow
13 the same guideline that we have at the border stations,
14 so -- and we might bump it up a little, so we will add
15 a small amount there, depending on what the sulfur
16 level is at the borders -- I mean at the borders, at
17 the storage field.

18 Q If you are adding it at the storage field,
19 where -- when are you adding it?

20 A We are adding it after the gas has been
21 processed, dehydrated, and it would be possibly -- it
22 would have to be downstream for a gas chromatograph.
23 That's there, so it would be possibly the last thing it
24 sees is when we add the odorant.

25 Q Okay. Does SoCalGas -- I think I know the

1 answer to this, but does SoCalGas ever add anything
2 directly to the storage gas when it is in the
3 reservoir?

4 A No.

5 Q Okay. Does SoCalGas ever add anything into
6 the wells themselves?

7 A You are talking about what compound?

8 Q At Aliso Canyon.

9 A You are talking about odorant; right?

10 Q We will start with odorant.

11 A Okay.

12 Q But I was asking a broader question, but
13 odorant, yes.

14 A Okay. So, odorant, no, we don't add it
15 anywhere except for at the -- you know, at the exit of
16 the plant.

17 Q Okay. Taking that question a little more
18 broadly than odorant, just to make sure, because I was
19 asking a little more broadly the first time, does
20 SoCalGas ever add anything directly into the storage
21 wells at the facility?

22 MR. JAMES: Vague and ambiguous.

23 BY MS. WIEMAN:

24 Q If you know.

25 A I don't know.

1 MS. WIEMAN: Okay. Could we go off the record for
2 a minute? I think the exhibits I needed are here, but
3 I just want to make sure.

4 MR. JAMES: Sure.

5 VIDEO OPERATOR BROWN: The time is 2:18. We are
6 going off the record.

7 (Recess taken.)

8 VIDEO OPERATOR BROWN: The time is now 2:35. Back
9 on the record.

10 BY MS. WIEMAN:

11 Q Ms. Lew, before we move into the slew of
12 exhibits we've put in front of you during the break, I
13 wanted to ask: Is the gas cleaned or scrubbed on its
14 way out of the facility at all to make sure it meets
15 commercial standards or residential standards?

16 A Well, the gas when it comes in meets
17 standards, and when it comes out, it should meet the
18 standard. And what we determined was the only thing
19 that's necessary to meet our standards then is that --
20 just to make sure that it meets our moisture limit of
21 seven pounds, that would be, like, the only thing that
22 would have changed while it was in the storage field on
23 withdrawal. We just want to make sure it is
24 dehydrated.

25 There are -- there are separators we have, you

1 know, upstream to protect our dehydration tower.

2 MR. JAMES: Volume.

3 THE WITNESS: Sorry.

4 BY MS. WIEMAN:

5 Q So is the answer, no, it is not cleaned or
6 scrubbed in any way on its way out of the facility?

7 A Well, what do you mean by cleaned --
8 originally your first question was cleaned or scrubbed
9 to meet our specification.

10 Q Right.

11 A I said yes. So we do treat the gas to meet
12 our specification, yeah, specifically for moisture
13 because that's the -- that was the -- what we have
14 determined, you know, is the -- what would be a concern
15 to us. Because when it is injected, it meets our spec.
16 When it is on withdrawal, it should meet our spec.

17 But there might be an issue with the water
18 content of the gas, so that's why we have a dehydration
19 plant to treat it.

20 Q And where is the dehydration plant in the
21 process? Not physically where is it, but where is it
22 in the process? So is it before or after the gas
23 chromatographs that are on the lines going out or the
24 meters going out of the facility?

25 A The gas chromatograph is downstream of the

1 dehy plant.

2 Q Okay. And you said the gas meets your spec
3 when it is injected, and you said when it is on
4 withdrawal it should meet your spec. Do you do
5 anything to make sure it meets your spec, which I
6 assume means specifications, on the way out of the
7 facility on withdrawal?

8 A Yes. So on its way out, we monitor for, you
9 know, the gas composition. The heating value is one of
10 our specs, so that's why we know when it goes in, it is
11 within the heating value range, when it is on
12 withdrawal on exit, it meets the heating value range.

13 Q Is that the only thing you look at? You look
14 at moisture, and you look at -- and you look at heating
15 value range. Do you look at anything else on the way
16 out?

17 A So the other constituents are -- that we can
18 see is the carbon dioxide and then the total inerts,
19 which is nitrogen, CO2. And the Wobbe number is the
20 other -- the other consistent -- or parameter, that's
21 what you call it.

22 Q So aside from the monitoring on the way out of
23 the facility, you don't do anything else to the gas to
24 make sure it meets residential or commercial standards?

25 A So the only thing we do at the dehy plant is

1 dehydrate to meet the standards other than, you know,
2 what I just went over.

3 Q The Wobbe number -- Wobbe, did I say that
4 right?

5 A You can say that any way.

6 Q Wobbe? "Wahbee"?

7 A Wobbe. It is German, I think.

8 Q Can you explain that to me a little bit?

9 A So the Wobbe number is the heating value
10 divided by the square root of the specific gravity, and
11 so that's just another indicator that the gas could be,
12 you know, burned or used properly in an appliance. It
13 is an industry standard.

14 Q I'll have to take your word for it.

15 Is there -- and is there a range for the Wobbe
16 number that's acceptable to SoCalGas?

17 A The range -- yeah. Okay. I'm sorry. The
18 range that we have is 1279 to 1385 Wobbe.

19 Q And as long -- and so to make sure I
20 understand the Wobbe number, as long as it falls within
21 that range, 1279 to 1385, the gas can be burned or used
22 in an appliance?

23 A Yes.

24 (The document referenced below was
25 marked Deposition Exhibit 8-2 for

1 identification and is appended hereto.)

2 BY MS. WIEMAN:

3 Q Okay. Turning for a minute to the document --
4 the top of the pile in front of you that's been marked
5 as Exhibit 8-2, I think the Bates numbers didn't make
6 it on that document. But it is -- I'll just identify
7 it for the record and give you what I have as the Bates
8 numbers that should be on there.

9 At the top it says 4/26/2018, Southern
10 California Gas Company measurement-collection system
11 Gas Analysis Report. It is a six-page document. The
12 Bates numbers should be SCG02287669 through
13 SCG02287674. And it looks to me like it should be --
14 to make sure we all have the right document, I have a
15 location, "Aliso Canyon Dehy 2, Withd (Stream 1)." Is
16 that the same document?

17 A (Nods head.)

18 Q Okay. I just want to make sure we are talking
19 about the same document.

20 So this one just happens to be at the top of
21 the pile, so I would love to use this one to kind of go
22 through all the data that's captured to make sure we
23 understand what's captured and what it means.

24 The location that I just read off, Aliso
25 Canyon Dehy 2 with D, parentheses, stream one, end

1 parentheses, is that one of gas chromatographs that you
2 were talking about earlier?

3 A Yes.

4 Q And where is this one located?

5 A This is located at Dehy 2.

6 Q Okay.

7 MR. KIESEL: Catherine, is this Exhibit 8-2?

8 MS. WIEMAN: This is Exhibit 8-2, yes.

9 MR. KIESEL: Thank you.

10 BY MS. WIEMAN:

11 Q And so is this -- is this testing gas coming
12 into or out of the facility?

13 A This is coming out.

14 Q Okay. What does "run number" underneath that
15 signify?

16 A I don't know.

17 Q Is this -- backing up a second, is this one of
18 the documents that you gathered and provided prior to
19 the deposition?

20 A Yes.

21 Q Okay. Device ID says DG-ALD02. Do you know
22 what that represents?

23 A I don't know.

24 Q And how about device type under that, DANGC?

25 A Okay. I'm going to guess that's our Daniel's

1 gas chromatograph.

2 Q Daniel's --

3 A Daniel's gas chromatograph.

4 Q Is that a name or a brand that you are
5 familiar with?

6 A Yes. That's the name of the gas chromatograph
7 we were using. It is from -- it is a Danalyzer, so as
8 I said, it is a Daniel's gas chromatograph.

9 Q Okay. And what -- what does this document --
10 since you gathered it and provided it, what does this
11 document represent or contain?

12 A So this is the hourly average gas composition,
13 the Dehy 2 gas chromatograph from October the 16th,
14 2015, to October 23rd, 2015.

15 Q And where at the facility is this gas
16 chromatograph located physically?

17 A Physically, it is located at Aliso Canyon
18 Dehy 2 plant.

19 Q Do you know where at the Aliso Canyon facility
20 that is?

21 A Well, I know where Dehy 2 plant is. Where the
22 GC is is at the outlet. I don't know physically
23 exactly, but it is at the outlet of the plant.

24 Q Have you ever seen this gas chromatograph?

25 A The Dehy 2. I may not have.

1 Q You are not sure?

2 A I'm not sure.

3 Q The first column says "Effective Date." What
4 data is represented -- what is represented by the data
5 in that column?

6 A This is the date at the first hour of the day,
7 of the 16th, or on whatever date it is. So it says
8 10/16/2015 000. So that would be from, you know,
9 midnight to right before 1:00. This would be the
10 average for that hour.

11 Q And the next column, "Analysis Status," what
12 information is contained in that column?

13 A I don't know exactly. This is used by the
14 measurement people.

15 Q They all say "closed" in that column.

16 A Yes.

17 Q Do you know what that -- do you know what that
18 means?

19 A Let's see. So when -- at the end of the
20 month, they will close -- I'm not exactly sure for the
21 analysis, but the person who goes by will -- the person
22 at measurement -- at the measurement department will
23 look at the data and review it. At the end of the
24 month, they will close the data or they will close it
25 out for -- at month end. So this is -- the status says

1 it is closed. You can't -- you cannot change it.

2 Q Closed means you can't change it?

3 A Yeah. It closes it. That's what the data is.

4 It is closed for --

5 Q So what would open mean?

6 A Open is if we see it -- if we look at the data
7 today, it will say opened -- it is the first of the
8 month; right? But at the end of the month, it will say
9 closed.

10 Q If it is open, can the data still be modified?

11 A Yes.

12 Q So let me ask this question: Can this data be
13 modified by hand during that 30-day period? While it
14 is still open. Let me ask it that way. While it is
15 still open, can this data be modified by hand?

16 A It could be modified -- by hand, huh? It
17 could be modified by hand or redirected to something
18 else. So --

19 Q By hand, I just mean can somebody go into and
20 modify this data if it still says open there.

21 A Right. So if they go in and if we have issues
22 with the data, they can go in and modify that data.
23 They could delete the data or they could extrapolate to
24 the last good read.

25 Q Why would they do that?

1 A It would be -- there would be various reasons.
2 I don't know. It would be a blip in the data
3 collection, loss of power. So --

4 Q Anything else?

5 A It would be -- they had -- if someone was
6 working on the GC or if it was off and the data wasn't
7 there, they would have to put something on there. So
8 that's when they would, you know, extrapolate it, the
9 data.

10 Q How would they extrapolate the data?

11 A That would be a question for the person that
12 would be looking at it. We would have to ask them how
13 they did it.

14 Q How would you know if data had been
15 extrapolated?

16 A Okay. There would be an asterisk next to the
17 data.

18 Q And --

19 A Or we would just know that it has been edited.
20 We wouldn't know why. We would just know it has been
21 edited.

22 Q So if there's an asterisk in this spreadsheet,
23 or any of the others we will look at, that means the
24 data has been modified in some way?

25 A Yes.

1 Q The next column is "BTU." That's just the BTU
2 of the -- the average hourly BTU of the gas; is that
3 correct?

4 A Yes.

5 Q Specific gravity is --

6 A The specific gravity of the gas, yes.

7 Q Okay. Then the next one is N2?

8 A That would be nitrogen.

9 Q Okay. And then CO2. Carbon dioxide,
10 obviously.

11 A Yes.

12 Q And is it N2 and CO2 that you said cannot
13 exceed 4 parts per million?

14 A 4 parts -- 4 percent.

15 Q 4 percent?

16 A Yes.

17 Q Okay. That's a good question, actually. This
18 data, like the N2 data, what is the -- it says 0.40 in
19 that first row. What does that stand for? What does
20 that mean?

21 A So this is the units that we are looking at
22 for the nitrogen as a mole percent.

23 Q What does that mean?

24 A You can see that up here. It is just the
25 percentage. It is just like 0.4 percent, mole percent

1 of nitrogen in the natural gas.

2 Q So when you were talking about 4 percent
3 before, though, is that -- 4 mole percent, is that the
4 same?

5 A Correct.

6 Q So if I add up the .40 plus the .87, as long
7 as it is less than 4 percent, then it is not a problem?

8 A Yes.

9 Q So the next column is "Methane," and then
10 further over towards the right, the second-to-last
11 column is "Methane Calc No."

12 What do those two columns represent?

13 A So the one next to the CO₂, the methane is
14 actually the methane -- the mole percent of methane.
15 The second-to-last column, Methane Calculation Number,
16 that's the methane number that -- it is similar to
17 octane number, like when you fill up your gasoline. So
18 it is like an antiknock index. So we have a similar
19 number for natural gas. We use natural gas in
20 vehicles. So that will give you the antiknock number.
21 And we call that our methane number.

22 Q I notice that the methane number -- the
23 methane calc number, which is in the second-to-right
24 column, is zero. Why is that?

25 A So on the analyzer itself, someone didn't

1 checkmark it to say calculate the methane number, so.

2 Q So it didn't calculate the methane?

3 A It didn't calculate the methane number.

4 Q And is that something that can be done now, or
5 if that box isn't checked, is that information that
6 cannot be calculated?

7 A You could go back and calculate based on the
8 composition. There's a formula for it.

9 Q Is that box supposed to be checked?

10 A Not necessarily. It would depend on if there
11 was -- if we had a limit there for a methane number or
12 if there was a natural gas vehicle at the site, we
13 might check it. But it is not required.

14 Q Why would it be -- why might it be checked
15 based on whether there was a natural gas vehicle at the
16 place?

17 A It's a -- so it is CARB, it's California Air
18 Resources Board. They had -- a long time ago, they had
19 a temporary exemption or temporary limit that they gave
20 us so that the methane number would have to be 80 and
21 above, but it is no longer being used.

22 Q So does that mean you are no longer doing the
23 methane calc number?

24 A Well, no, there's no reason for it.

25 Q Okay.

1 A I mean, if we had it checkmarked before, it
2 would probably remain checkmarked. If we didn't have
3 it, you know, there's no -- there's no MTB station at
4 Aliso, so we wouldn't have checkmarked that.

5 Q Going back further to the left, there's the
6 C6+ column. We were talking a little bit earlier about
7 the kinds of things that fall into the C6+ category.
8 You mentioned benzene might -- if there were benzene,
9 it might fall in that category. How would you know?

10 A If it is present, it would be there. We
11 wouldn't know for sure unless we specifically tested
12 for it.

13 Q So this number --

14 A The amount --

15 Q Okay.

16 A The amount is .03 percent here, so that's low
17 for --

18 Q But that .03 percent could be hexane, heptane,
19 octane, benzene, and any one of any other number of
20 constituents that are, you know, heavier molecules;
21 isn't that correct?

22 A Yes, that's what I said.

23 Q So is there any way to know what's in -- what
24 that .03 mole percent is made up of?

25 A Just based on, you know, what our default is

1 or what our experience is, that it is mainly, you know,
2 hexane, but we wouldn't know what the benzene level
3 was. I'm saying it would probably be around 1 ppm, but
4 we couldn't tell exactly from here, but it would be
5 less than this amount and it would be, you know,
6 certainly trace amounts.

7 Q When you say it would probably be around
8 1 ppm, what is that based on?

9 A That is just based on our experience for all
10 these years when we have had to test for benzene from
11 our out-of-states, you know, and it has been singular
12 numbers -- it has been single-digit numbers like 1 ppm
13 or 2 ppm.

14 Q Is there any way to recalibrate this
15 chromatograph so that it breaks down the C6+ category
16 into each of the individual types of components,
17 molecules -- let's try that again.

18 Is there any way to recalibrate the gas
19 chromatograph so that it breaks down the C6+ category
20 into each of the different potential hydrocarbons?

21 A No.

22 Q So C6+ is the best it can get?

23 A That's -- yeah.

24 Q The most specific it can get?

25 A Yes. From this GC, it is just C6+.

1 Q Are there other gas chromatographs that can do
2 a more specific analysis?

3 A You would have to purchase it and buy it for
4 that specific analyzer.

5 Q Is there any way to -- is it ever possible --
6 is it ever possible for SoCalGas to recalibrate this
7 machine in a way to look specifically for benzene?

8 MR. JAMES: Asked and answered.

9 THE WITNESS: No.

10 BY MS. WIEMAN:

11 Q No. Okay.

12 The next couple categories are ethane,
13 propane, i-butane, n-butane, i-pentane, n-pentane, and
14 neopentane. I notice that when we get to -- in this
15 document, when we get to the n-pentane and neopentane,
16 those two columns all are filled with zeros. Why is
17 that?

18 A It is not in the gas.

19 Q Okay. So it is not -- it's not like the
20 methane calc number that we were talking about earlier
21 where it wasn't calculated for. It is just not present
22 in gas?

23 A Correct.

24 Q Okay.

25 A Yes.

1 Q And what is the un-normalized total?

2 A That's the total from the raw analysis before
3 it is normalized. It is un-normalized.

4 Q What does normalize mean?

5 A Oh. To make it equal to a hundred.

6 Q Okay. And then we already talked about the
7 Wobbe or "Wahbee" number, which is the last column.

8 Can you tell from looking at this six-page
9 document when this machine was calibrated?

10 A I don't think so, no. No.

11 Q No? Okay.

12 If there were any instrument errors during
13 this week-long period, would they be reflected in this
14 document?

15 A I don't see any edits here, no. I don't see
16 anything out of the ordinary.

17 Q How would you know if there was something that
18 was out of the ordinary?

19 A Well, I mean, I just look at the numbers to
20 see if there's some slight variations or there's
21 something wrong with it. I don't see anything. It is
22 pretty constant.

23 Q If there was an instrument error, would there
24 be an asterisk next to data?

25 A Yeah. If there was an issue with the data

1 coming in, if they would have -- then if they had to
2 edit, they would put an asterisk.

3 Q How frequently is this data reviewed? This
4 captures hourly data for a week-long period what this
5 data -- is it simultaneously reviewed by SoCalGas or --
6 I'll say concurrently or fairly concurrently.

7 A I can't answer that because I'm not part of
8 the measurement group, but I do know they review it. I
9 don't know when they actually review it, but they do
10 review the data. And it is reviewed by the end of the
11 month because they can't mark closed unless they review
12 the data.

13 Q If it is the end of the month and they find a
14 problem with data on the first day of the month, how do
15 they know how to edit it?

16 MR. JAMES: Calls for speculation.

17 THE WITNESS: Yeah, they would know because they
18 would ask -- they have somebody -- they have an analyst
19 they could ask, like what should we do with this data.

20 BY MS. WIEMAN:

21 Q In your role as principal engineer, do you
22 review data from gas chromatographs? I know not at
23 Aliso, but at other facilities?

24 A Only if I'm asked to.

25 Q Okay.

1 A I mean, it is someone else's day-to-day job in
2 the measurement department to look at it.

3 Q Are you part of the measurement department?

4 A No.

5 Q Are they part of your department? Let me ask
6 it that way.

7 A No.

8 Q Okay. Is it the measurement department that
9 would know how they go about editing data if they see
10 an issue with it?

11 A Yes. That's up to them to edit, and they
12 have -- they have -- they have -- must have guidelines
13 to do it, but they do -- they do have to ask, whoever
14 is put in charge of, like, how -- you know, they are --
15 they do ask another analyst, like, what should I do
16 with this data, it is missing this. And then that
17 person will tell them, you know, what to do.

18 Q This is all the data -- you know, these
19 various columns we just went through, this is all data
20 that was printed out. So is there other data in that
21 measurement-collection system besides just these
22 constituents here that we talked about?

23 MR. JAMES: Calls for speculation.

24 THE WITNESS: This --

25 MR. JAMES: Vague and ambiguous.

1 THE WITNESS: What was your question?

2 BY MS. WIEMAN:

3 Q We just talked about each of the columns here,
4 BTU, Specific Gravity, N2, CO2, Methane, all the way
5 through to Neopentane, the different analyzers [sic]
6 monitored by this gas chromatograph. Are these the
7 only constituents that are monitored by this gas --
8 this specific gas chromatograph?

9 A Yes.

10 Q Okay.

11 (The document referenced below was
12 marked Deposition Exhibit 8-3 for
13 identification and is appended hereto.)

14 BY MS. WIEMAN:

15 Q I would like to look at the document that is
16 marked 8-3, which should be next on your pile. It is a
17 52-page document. It says it is for -- I'll just read
18 location to make sure we are looking at the same one.
19 "Aliso Canyon, Dehy 2 Withd (Stream 1)."

20 Is that the one you have in front of you?

21 A Yes.

22 Q I'll read for the record the Bates numbers,
23 which I think also fell off the bottom of that one.
24 SCG02287675 through SCG02287726.

25 Can you tell me, is this one of the documents

1 you gathered or sets of data you gathered and provided
2 before this deposition?

3 A Yes.

4 Q What is this data?

5 A This is the daily average from October 23rd,
6 2010, to October 16, 2018.

7 Q And is this data for the same gas
8 chromatograph we were just talking about?

9 A Yes.

10 Q Okay. I notice the last column, the Wobbe
11 number, there is no data in that column. Why is that?

12 A Hmm. Good question. I don't know.

13 Q Who would know?

14 A It would be someone from the measurement
15 department.

16 Q Is there a reason you can think of that there
17 would be hourly average Wobbe data but not daily
18 average Wobbe data?

19 A Sometimes it does show up.

20 Q Well, it looks like it shows up on -- starting
21 on September 11, 2015, through October 16th, but that
22 isn't present before then.

23 A Someone must have checkmarked it again.

24 Q The Wobbe number is something that can also be
25 checkmarked or un-checkmarked?

1 A Uh-huh. On the analyzer.

2 Q So that isn't data that is always captured by
3 SoCalGas?

4 A So on the analyzer itself, so this is daily
5 average, we -- when it is out there -- you checkmark
6 what do you want, average, and it will checkmark it.
7 So Wobbe wasn't checkmarked on this one. It shows up
8 on -- that's a question for measurement. I don't want
9 to answer it because it is kind of confusing.

10 BY MS. WIEMAN:

11 Q If you look at October 28th, 2010, which is on
12 the first page, I notice that the N2 number is 0.38
13 with an asterisk. What does that represent?

14 A Someone went in and changed it, the data,
15 nitrogen only.

16 Q And how would you -- do you know what they
17 changed?

18 A You would have to ask -- we have to go in and
19 look at the data to see what was edited and go through
20 their -- if their notes exist, we would have to go
21 through their notes.

22 Q If you wanted to find out as you sit here
23 today what was changed in that N2 number, who would you
24 call?

25 A We would call someone in the measurement

1 department or --

2 Q Who specifically would you call?

3 A We have a -- well, we call -- they like us to
4 email. We email out, actually. They have a group
5 email, so we just send it to the group email. Whoever
6 made this change would -- should reply back to us.

7 Q I notice that that is data from 2010. If that
8 person is no longer with SoCalGas, how would we find
9 out what had been changed?

10 A We would try to go -- I mean, we would
11 actually try to go -- or someone in the measurement
12 department would investigate for us. If there was
13 notes on it, they could look at it and tell us.

14 Q Do they have a current email box like
15 measurement@SoCalGas.com or something like that?

16 A Yeah, something similar to that.

17 Q But there isn't any one particular person you
18 would reach out to to find out the answer to that
19 question?

20 A I wouldn't know who was in charge of this set
21 of data.

22 Q Okay. So if you were going to solve that
23 problem, you would --

24 A It would still be a group email.

25 Q Group email?

1 A Yes.

2 Q Okay. I know that you go down to
3 November 1st, 2010. It looks like BTUs, specific
4 gravity, nitrogen, and CO2 all have asterisks next to
5 them.

6 A Right. So that -- all four of them was added
7 to it somehow.

8 Q And as you sit here today, you don't know why
9 or how they were edited?

10 A I can't tell.

11 Q If you turn to page 5 of 52, if you look up in
12 the top right, there's page numbers. About
13 three-quarters of the way down the page, the entry
14 starting with April 4, 2011, all the way through the
15 bottom of the page, those same first four columns, BTU,
16 Specific Gravity, N2, and CO2, all have asterisks.

17 Do you see that?

18 A Yes.

19 Q And then for every day from there through
20 April 15th at the bottom of the page and actually --
21 actually, we will start with this page. Yeah, through
22 the bottom of the page, those all have -- those first
23 four columns all have asterisks.

24 Do you see that?

25 A Yes.

1 Q Do you know why those have asterisks?

2 A I don't know exactly why.

3 Q Is there a reason those first four columns
4 might have asterisks that the rest of the columns would
5 not?

6 A They -- okay. So the measurement department
7 only changes the first four columns. They don't have
8 the ability to change the rest.

9 Q Why is that?

10 A They just don't. I don't know why.

11 Q I notice if you look at these numbers, they
12 are the same. So, for example, BTUs is -- starting on
13 April 4, 2011, is 1027.72. And if you look down, every
14 day between then and April 15th, it is the same. Do
15 you see that? Just on that same page.

16 A Oh, okay. Yes.

17 Q Do you know why it would be exactly the same
18 with an asterisk like that?

19 A I would be guessing, but it would be the last
20 good read. So on April the 3rd, it would be the exact
21 same read, or close to it. So they went by the rule of
22 use the last good read.

23 Q And what would cause a bad read?

24 A If there was an issue with the collection of
25 the data, if there was an issue of the gas

1 chromatograph, that would cause the bad read.

2 Q But as you sit here today, you don't know --

3 A I don't know.

4 Q -- what caused that bad read?

5 A No.

6 Q Or what was wrong with the data on -- and what
7 was changed in the data on any one of those days?

8 A Changed in the data.

9 Q What the asterisk represents on any of those
10 between April 4, 2011, and April 15, 2011, for the
11 BTUs?

12 A The asterisk was that it was edited.

13 Q But you don't know what specifically was
14 edited?

15 A The BTU was edited.

16 Q But you don't know how; right?

17 A Or how --

18 Q You don't know what the original BTU reading
19 was that was there?

20 A No.

21 Q If you turn to the next page, page 6 of 52,
22 that same exhibit, 8-3. Starting on April 20, 2011,
23 and continuing on through page 8 of 52 through it looks
24 like July 10 of 2011, there doesn't appear to be any
25 data for methane, C6+, ethane, propane, i-butane,

1 n-butane, i-pentane, n-pentane, or neopentane.

2 Do you see that?

3 A Yes.

4 Q Why is that?

5 A Why there is no data?

6 Q Uh-huh.

7 A I don't know.

8 Q Who would know?

9 A We would have to ask the measurement
10 department on what happened.

11 Q To produce this document, you looked at all --
12 you looked at all the data that's maintained in the
13 measurement collection -- what's it called? Sorry.
14 Database. Measurement-collection database. Did I get
15 that right?

16 A It is up here, measurement-collection system.

17 Q Oh, thank you. Collection system. That will
18 make it nice and easy for me.

19 You looked at all the data that was in the
20 measurement-collection system for these dates,
21 10/23/2010 to 10/16/2015; is that correct?

22 A So given the time, I only downloaded. I
23 download the data, is that what you mean?

24 Q Uh-huh.

25 A Yes. I downloaded this data.

1 Q Is that different than looking at the data?

2 A I'm looking at the data now.

3 Q Okay. You downloaded the data.

4 A Yes.

5 Q If there had been data in the
6 measurement-collection system for those constituents
7 that I just read, methane over -- all the way through
8 neopentane in the measurement-collection system, would
9 that data have been here in this report?

10 A Yes. If it was in there, it should have shown
11 in here.

12 Q Okay. What are the reasons that there
13 wouldn't be data regarding those constituents in the
14 measurement-collection system?

15 MR. JAMES: Calls for speculation.

16 THE WITNESS: I don't know.

17 BY MS. WIEMAN:

18 Q Who would know?

19 MR. JAMES: Same objection.

20 (Mr. Boucher leaves the room.)

21 THE WITNESS: I don't know. I would still ask
22 them, the measurement group.

23 BY MS. WIEMAN:

24 Q Do you know whether SoCalGas has data
25 regarding the composition of each of those -- let me

1 ask that again.

2 Do you know whether SoCalGas has data
3 reflecting the composition of natural gas between those
4 dates, April 20th, 2011, and July 10th, 2011, that
5 isn't here, the missing data?

6 I think I can ask that better.

7 A I want to say I don't know. Do you want to
8 rephrase it?

9 Q I can try and rephrase it.

10 A Yes.

11 Q Do you know whether SoCalGas has data that
12 reflects, for example, the methane or C6 or ethane
13 content of natural gas between April 20th, 2011, and
14 July 10th, 2011?

15 A No.

16 Q No, you don't know?

17 A No, I don't know.

18 Q Okay. If it wasn't in the
19 measurement-collection system, where could that data be
20 found or where might that data be found?

21 A I don't know.

22 (The document referenced below was
23 marked Deposition Exhibit 8-4 for
24 identification and is appended hereto.)

25 ///

1 BY MS. WIEMAN:

2 Q If we could look at -- if you could turn next
3 to the document that's been marked 8-4, which is a
4 six-page document, the location up at the top is "Aliso
5 Canyon Dehy 1 Withd (Stream 1)."

6 Do you see that?

7 A Yes.

8 Q Okay. So just for the record, the Bates
9 numbers of that document are SCG02287843 through
10 SCG02287848.

11 Which gas chromatograph does this data come
12 from?

13 A This comes from the gas chromatograph at
14 Dehy 1.

15 Q And so this is a different gas chromatograph
16 than the one we were talking about in the last two
17 exhibits; correct?

18 A Yes.

19 Q Okay. And is this gas chromatograph testing
20 natural gas as it is headed into the facility or being
21 withdrawn from the facility?

22 A This is gas that's being withdrawn from the
23 facility.

24 Q Is this one of the exhibits or -- that you
25 provided prior to this deposition?

1 A Yes.

2 Q Okay. And the -- if -- could you turn to the
3 last page, page 6 of 6. There's an entry for
4 October 23rd, 2015, at eleven o'clock.

5 Do you see that? Okay.

6 A Yes.

7 Q And it looks, again, like the first four
8 columns, BTU, Specific Gravity, N2, and CO2, have
9 asterisks.

10 Do you see that?

11 A Yes.

12 Q Do you know why those have asterisks?

13 A It has been edited.

14 Q Do you know how the data has been edited?

15 A No.

16 Q I noted that the rest of the column, except
17 for Wobbe, the very far right, the Wobbe number, but
18 the rest of columns, which are Methane, C6+, Ethane,
19 Propane, i-Butane, n-Butane, i-Pentane, n-Pentane, and
20 Neopentane -- oh, as well as the un-normalized total
21 and the methane calc number -- are all blank.

22 Do you see that?

23 A Yes.

24 Q Do you know why?

25 A No.

1 Q Do you know who would know why?

2 A It would probably be somebody at the
3 measurement department.

4 Q Okay. Did you ask anybody at the measurement
5 department why that information was blank before this
6 deposition?

7 A No.

8 (The document referenced below was
9 marked Deposition Exhibit 8-5 for
10 identification and is appended hereto.)

11 BY MS. WIEMAN:

12 Q Okay. If I could turn your attention to
13 Exhibit 8-5. Just to make sure we are looking again at
14 the same one, it is a 52-page document. The location
15 is "Aliso Canyon Dehy 1 Withd (Stream 1)."

16 Do you see that?

17 A Yes.

18 Q Just for the record, Exhibit 8-5 has the Bates
19 numbers SCG02287849 through SCG02287900.

20 If I could turn your attention to page 8 of 52
21 through 11 of 52. On page 8, starting on July 13,
22 2011, the first four columns, BTU, Specific Gravity,
23 N2, and C02, all have asterisks.

24 Do you see that?

25 A Yes.

1 Q And those asterisks continue all the way
2 through the entry for October 16, 2011, on page 11.

3 A Okay.

4 Q Do you see that?

5 A Yes.

6 Q Do you know why those four columns had
7 asterisks for each of those dates?

8 A They have been edited, but I don't know why
9 they have been edited.

10 Q Okay. And who would you ask to find out why
11 they have been edited or how they have been edited?

12 A I would ask someone -- I mean, I would ask the
13 measurement department.

14 Q Before your deposition today, did you ask
15 anybody in the measurement department?

16 A No.

17 Q For those same dates, July 13, 2011, through
18 October 16, 2011, all the rest of the columns are
19 blank. Do you see that? Besides the first four
20 columns.

21 A Oh, okay.

22 Q So Methane all the way through Wobbe number
23 are blank from October -- no, July 13, 2011, through
24 October 16, 2011.

25 Do you see that?

1 A Right.

2 Q Do you know why they are blank?

3 A This is not available. I don't know why.

4 Q You don't know why?

5 A No.

6 Q Did you ask anybody why?

7 A No.

8 Q And who would you reach out to?

9 A The measurement department.

10 Q The measurement department, okay.

11 And you don't know whether that data exists?

12 Let me ask that again.

13 Do you know whether that data exists?

14 A Do I know? I don't know.

15 Q You don't know or no?

16 A I don't know exactly if it exists or not.

17 Q Okay. Do you have a suspicion about whether

18 it exists or not?

19 A No.

20 Q Okay.

21 A I mean, don't know.

22 Q If it is not in the measurement-collection

23 system, is there anywhere else that data could be?

24 A No. I don't know.

25 Q Is there any reason why your search that put

1 together this spreadsheet that's Exhibit 8-5 could have
2 missed data if it was there?

3 A No. I mean, I just download it from the
4 system, so it is whatever is available.

5 Q Okay. So whatever was in the system should
6 have been downloaded by your search?

7 A Yes.

8 (The document referenced below was
9 marked Deposition Exhibit 8-6 for
10 identification and is appended hereto.)

11 BY MS. WIEMAN:

12 Q Okay. Was that 8-5 I just did? It was.

13 So if I could have you look at what has been
14 marked as Exhibit 8-6, location up at the top, just to
15 make sure we are looking at the same document, is
16 "Aliso Canyon TDC Injection (Stream 1)."

17 Do you see that?

18 A Yes.

19 Q And what gas chromatograph is this data from?

20 A This is from the injection -- one of the
21 injection gas chromatographs. It is the one that we
22 call the TBC.

23 Q Okay. So this is TBC?

24 A Yes.

25 Q Seems self-explanatory, but I always like to

1 ask.

2 I see below the device type, it says DANGC.

3 What's that?

4 A It is the same type of analyzer. It is the
5 Daniel's gas chromatograph.

6 Q Are all four of the gas chromatographs the
7 same type of device?

8 A Yes.

9 Q Do they all use the same software?

10 A Yes. They should, yes.

11 Q On this one, if I could just have you look at
12 page 5 of 6, but I think I forgot to put the Bates
13 numbers of this one in.

14 For the record, Exhibit 8-6 has Bates numbers
15 SCG02287785 through -2287790.

16 So page 5 of 6, October 22nd, 2015, at
17 twelve o'clock.

18 Do you see that entry?

19 A Yes.

20 Q The first four columns again, the BTU,
21 Specific Gravity, N2, and CO2, have asterisks. What
22 does that mean?

23 A It means they have been edited.

24 Q Do you know how they have been edited?

25 A Well, they have been edited to this number.

1 Q Do you know in what way they have been
2 modified?

3 A I can't tell you.

4 Q Do you know what the original numbers were
5 that were in those -- in each of those columns?

6 A No.

7 Q Who would you ask?

8 A The measurement department.

9 Q And the rest of the columns from Methane all
10 the way over through Methane Calc Number are blank.

11 Do you see that?

12 A Yes.

13 Q Do you know why those are blank?

14 A I don't know.

15 Q Okay. Who would you ask?

16 A The measurement department.

17 Q And did you ask the measurement department
18 before your deposition?

19 A No.

20 (The document referenced below was
21 marked Deposition Exhibit 8-7 for
22 identification and is appended hereto.)

23 BY MS. WIEMAN:

24 Q 8-7 -- we are moving through them quickly now.

25 Exhibit 8-7, just to make sure we are looking

1 at the same one, it's a 52-page document, location
2 "Aliso Canyon TDC Injection (Stream 1)."

3 Do you see that?

4 A Yes.

5 Q Is this one of the documents you prepared and
6 provided before your deposition?

7 A Yes.

8 Q And what does this -- what data does this
9 spreadsheet contain?

10 A This is the daily gas analysis from
11 October 23rd, 2010, to October 16, 2015, from the Aliso
12 Canyon TDC injection gas chromatograph.

13 Q Okay. And just quickly for the record, the
14 Bates numbers of Exhibit 8-7 are SCG02287791 through
15 SCG02287842.

16 I noticed in the analysis status column for
17 the dates October 27, 2010, to November 30th, 2010, it
18 says "Open."

19 Do you see that?

20 A Yes.

21 Q Why does that say open?

22 A I have no idea what happened here.

23 Q Is there a reason that would still be open?

24 A I don't know.

25 Q Does that mean that this data is still capable

1 of being edited?

2 A That's what it indicates, it's open. It
3 hasn't been closed out from view.

4 Q But it is from seven and a half years ago;
5 correct?

6 A Yes.

7 Q Who would you ask to find out why that data is
8 still open?

9 A The measurement department.

10 Q If you go a little bit further down, I note
11 October 4th -- starting on October 4, 2010, there is --

12 A October what?

13 Q I'm sorry, November 4th, 2010.

14 A Okay.

15 Q It then jumps to November 14, 2010. Do you
16 see that? There's no data for the dates in between
17 there.

18 A Right.

19 Q Do you know why?

20 A Data wasn't available. I don't know.

21 Q What are the reasons data wouldn't be
22 available?

23 A Well, I would be guessing. I would not know
24 exactly why they didn't download the data or if it was
25 even available.

1 Q If there was data in the
2 measurement-collection system for the dates October 5th
3 through October -- nope -- November 5th through
4 November 13th, 2010, would that data have been gathered
5 in your search -- your download?

6 A Yes.

7 Q Okay. I notice if you look at the dates -- I
8 can do it -- November 4th, 2010, and November 14th,
9 2010, and 15th, 2010, those three entries, the BTU is
10 listed as zero.

11 Do you see that?

12 A Yes.

13 Q Why is that?

14 A I -- at the time, it looks like the GC wasn't
15 working --

16 Q And why --

17 A -- properly. I don't know why. And so, based
18 on what was downloaded, would have equaled zero BTU.

19 Q Is there a way to find out why the gas
20 chromatograph was not working at that time?

21 A I would have to ask -- we would have to ask
22 around on what happened, if there was any notes or
23 anything on the logbooks.

24 Q Have you seen that before where data is just
25 missing for certain days when you are looking at the

1 daily averages?

2 A Where? On -- on this data?

3 Q No. Anywhere at SoCalGas, is there -- have
4 you seen -- in your experience, have you seen just gaps
5 in data like that?

6 A I have.

7 Q And what causes them?

8 A There are a lot of reasons. I would just be
9 speculating. Either the analyzer was down or our
10 communications with the gas chromatograph was down, so
11 we couldn't download data directly from the GC.

12 Q And how would you find out which --

13 A We would have to ask around.

14 Q Who would you ask?

15 A I would ask the measurement department or
16 whoever was in charge of the gas chromatograph at the
17 site, if it was just turned off --

18 Q Are there --

19 A -- or not running.

20 Q You said before that when the machine is being
21 calibrated, that doesn't end up being reflected in this
22 data set that you provided?

23 A Correct.

24 Q If it is turned off, might it be reflected in
25 this data set?

1 A No.

2 Q Okay. So it probably wasn't turned off. So
3 if it is --

4 A Well, I don't know, because the dates on
5 this --

6 Q Okay.

7 A -- it is not continuous, so.

8 Q So it could be?

9 A It could be. We would have to -- so it is
10 automatic. It will go on pull, as you see. So if it
11 pulls and it is not there, it just -- either it didn't
12 pull, it couldn't connect, or if it wasn't on.

13 Q And would you ask the measurement group --

14 A Yes.

15 Q -- if they had any further information about
16 that?

17 Is there anybody at the facility that you
18 would contact to find out if they had more information
19 about those missing days?

20 A It would be the measurement group that would
21 contact the facility first, and they would have -- have
22 to go that way through the measurement group.

23 Q If you could look at page 3 of 52 of
24 Exhibit 8-7, starting on January 19, 2011, through
25 January 31st, 2011, those first four columns, BTU,

1 Specific Gravity, N2, and CO2, all have asterisks next
2 to them.

3 Do you see that?

4 A Yes.

5 Q Do you know why those have asterisks?

6 A They have been edited.

7 Q Do you have any idea in what way they have
8 been edited, how they have been changed from --

9 A How they have been changed? Well, it looks
10 like they took the last good read on January 18th,
11 2011. What it was before, I don't know.

12 Q For those same dates, I notice that the
13 Methane column, the Propane column, i-Butane, n-Butane,
14 i-Pentane, n-Pentane, and Neopentane, all just have
15 zero readings.

16 A Yes.

17 Q What does that mean?

18 A It didn't -- well, the analyzer wasn't working
19 properly and it didn't find anything. I don't know
20 what happened.

21 Q Is it your belief that the data for those
22 dates, for example, just looking at the Methane column,
23 the data for those dates where it just says zero, that
24 that data is wrong?

25 A It's the gas chromatograph wasn't working

1 properly.

2 Q Okay. Who would you -- do you know whether
3 SoCalGas has any data to reflect what the actual
4 average daily methane composition of the gas was on
5 those days?

6 A For those dates? If they edit it this way, it
7 wasn't available then. It looks like they just
8 extrapolated the last good read, so there wasn't
9 anything else available for them to use.

10 Q Why would they extrapolate the last good read
11 for the first four columns, but not for methane all the
12 way through neopentane?

13 A So they were not able to edit this data from
14 methane on to neopentane.

15 Q Why is that?

16 A It is just something that they chose -- the
17 measurement department doesn't do. They just look at
18 the first -- they just edit the first four columns.

19 Q So it is your testimony, then, that the gas
20 chromatogram -- gas chromatograph was not working
21 properly on those dates. Does that mean SoCalGas does
22 not have data regarding the methane through neopentane,
23 to make it simpler, content of the natural gas facility
24 on those dates?

25 A No, not for this gas chromatograph.

1 (The document referenced below was
2 marked Deposition Exhibit 8-8 for
3 identification and is appended hereto.)

4 BY MS. WIEMAN:

5 Q Okay. Exhibit 8-8, I may not have any
6 questions, but I'll identify it for the record. It is
7 a six-page document, the location says "Aliso Canyon
8 KVS Injection (Stream 1)."

9 Do you see that?

10 A Yes.

11 Q For the record, Exhibit 8-8 has the Bates
12 numbers SCG02287727 through SCG02287732.

13 My only question is: What data is represented
14 in this exhibit?

15 A This is the hourly average at Aliso Canyon,
16 KVS injection and gas chromatograph from October the
17 16th, 2015, to October 23rd, 2015.

18 Q And is this the gas chromatograph you called
19 KVS earlier today?

20 A Yes.

21 Q Where is this gas chromatograph located?

22 A It is at the plant. I don't know exactly
23 where it is at, but it is near the KVS station.

24 Q What does KVS stand for?

25 A It is the model number of the equipment.

1 Q Okay.

2 A Yes.

3 Are we almost done?

4 Q Yes.

5 A Okay. We can take a break now?

6 Q Yes. Let me just identify the last one for
7 the record, and then we can take a break.

8 A Okay.

9 (The document referenced below was
10 marked Deposition Exhibit 8-9 for
11 identification and is appended hereto.)

12 BY MS. WIEMAN:

13 Q Exhibit 8-9 is a 52-page document, location
14 says "Aliso Canyon KVS Injection (Stream 1)." For the
15 record, it has the Bates numbers SCG02287733 through
16 SCG02287784.

17 Is this one of the documents you prepared and
18 provided prior to your deposition?

19 A Yes.

20 Q What data is reflected in this document?

21 A This is the daily average gas analysis report
22 from the Aliso Canyon KVS injection from October 23rd,
23 2010, to October 16, 2015.

24 Q Is it safe to say that if any of the data in
25 this -- in Exhibit 8-9 has an asterisk, it has been

1 edited in some way?

2 A Yes, it has been edited.

3 Q Is it a safe assumption that you don't know
4 exactly what -- in what way it has been edited?

5 A Right. I don't know exactly why it has been
6 edited.

7 Q And who would you ask to find that out?

8 A The measurement department.

9 MS. WIEMAN: Okay. Thank you. We can take a
10 break.

11 MR. KIESEL: Can I just ask a quick question on
12 this subject before we do?

13 I just want to know, is it the software that
14 doesn't allow them to edit those fields, or is it a
15 choice, if you know?

16 THE WITNESS: Oh, it is the software.

17 MR. KIESEL: Okay. That's what I wanted to know.
18 Thank you.

19 VIDEO OPERATOR BROWN: The time is now 3:37. Going
20 off the record.

21 (Recess taken.)

22 VIDEO OPERATOR BROWN: The time is now 3:49. Back
23 on the record.

24 BY MS. WIEMAN:

25 Q Ms. Lew, I have just a couple more questions

1 for you this afternoon. Then I'm going to pass you
2 back off, I think, to Mr. Parris.

3 We talked a little bit about the dehydrator.
4 I just want to make sure I understand where in the
5 process that is.

6 So the gas comes -- correct me if I'm wrong.
7 The gas comes out of the field, it goes through the
8 dehydrator, and then through the GCs; is that correct?

9 A That's the order it is, yes.

10 Q That's correct?

11 A Yes.

12 Q You look like that's not correct. Is that
13 correct?

14 A Well, yes, that's correct that it goes from
15 the field to the dehydration plant, and then we have
16 the GC that we sample downstream --

17 Q And so --

18 A -- of the Dehy plant.

19 Q -- the gas has gone through the dehydration
20 plant before it goes through the gas chromatographs?

21 A Yes.

22 Q The two gas chromatographs -- one of the two
23 gas chromatographs; is that right?

24 A Yes.

25 Q I should actually clarify that. It doesn't go

1 through both GCs; does it? The same gas -- does the
2 same gas go through both gas chromatograms -- -graphs?

3 A No.

4 Q Okay.

5 A There's one in each dehy plant.

6 Q So there's two dehydration plants?

7 A Yes.

8 Q What does the dehydrator pull out of the gas?

9 A Water.

10 Q Just water? Does it pull anything else out of
11 the gas?

12 A The -- it is -- I don't know if I can answer
13 that totally, but it is -- what's in the plant is
14 glycol. So it's triethylene glycol, and it absorbs the
15 water. It takes the water out of it, yes. Yes.

16 Q Can you say that again because I couldn't hear
17 you? In the plant is what?

18 A It is a glycol.

19 Q Okay. And what does that mean?

20 A So it is -- it is a liquid that will absorb
21 water.

22 Q And does it absorb anything else besides
23 water?

24 A No.

25 MR. JAMES: Beyond the scope.

1 THE WITNESS: It absorbs water. Triethylene glycol
2 absorbs water.

3 BY MS. WIEMAN:

4 Q And what's it called?

5 A Triethylene glycol.

6 Q Triethylene glycol, it absorbs water?

7 A Yes.

8 Q Do you know whether it absorbs any other
9 liquid?

10 A I don't know. Which liquid?

11 Q Any other liquid besides water.

12 A It just absorbs -- no. It just absorbs the
13 water.

14 Q If there was any other liquid in the gas as it
15 came through the dehydration plant, would that liquid
16 get absorbed by the triethylene glycol?

17 A No, it wouldn't be absorbed.

18 Q Would it be something else? I'm not a
19 scientist. I want to make sure I am using the right
20 word.

21 A I can't say exactly. No. I just know that
22 the triethylene glycol absorbs the water.

23 Q Okay.

24 A Yes.

25 Q You called it a dehydration plant. When I

1 picture a plant, I picture something big like a power
2 plant. Is this a massive building where this gas goes
3 through a lot of different processes before it comes
4 out the other end, or is it really just -- is it less
5 complicated than that?

6 A Yes. It is more simple than that. The gas
7 goes through the -- just like one -- you know, it is
8 one big contactor tower that has the glycol in it.

9 Q Okay. And it pulls out water?

10 A Yes.

11 Q And do you know -- and you don't know if it
12 pulls out anything else?

13 A The glycol? Yeah, I don't know what you are
14 looking for.

15 Q Just --

16 A So if it's the glycol, it's the type that it
17 will take out more water.

18 Q Okay. But if there were any -- if the gas
19 picked up any other liquid that was in the storage
20 facility -- in the storage field, would that liquid
21 also be pulled out by the dehydration process?

22 A I don't know if is called pulled out, but it
23 might go out with the glycol.

24 Q Okay. Do you know whether SoCalGas does any
25 testing on whatever comes out of the dehydration

1 process?

2 A I don't know exactly what test you are talking
3 about.

4 Q Any sort of testing to see if it is just
5 straight H2O that got pulled out or whether the water
6 contains any other constituents that is a byproduct of
7 the dehydration process.

8 A So at our lab, we actually -- if they want to
9 test the quality of the glycol, we will test the
10 quality of the glycol to see what percent water is in
11 the glycol.

12 Q Has the lab done that before?

13 A I don't know if we have done any for Aliso.

14 Q Have you done it for other facilities?

15 A We may have.

16 Q Okay.

17 A Yes.

18 Q You are not sure?

19 A I know we -- I know we are capable of doing
20 it. I just don't know, you know, which fields we have
21 been doing it for.

22 Q Okay. But you don't recall ever doing -- in
23 the period from 2010 to 2015, doing that for Aliso?

24 A I don't know exactly if we have done it for
25 Aliso.

1 Q If you had done it for Aliso, would that data
2 exist somewhere at SoCalGas?

3 A If it has been the last five years from now,
4 we will have the data.

5 Q So from 2013 to now, you might have the data?

6 A Yes.

7 Q And for 2010, maybe, maybe not?

8 A Yes.

9 Q Okay. Where would you look to see if that
10 data existed?

11 A We would have to go through our electronic
12 files again or whatever hard copies we might have.

13 Q And that's not something you looked for before
14 this deposition?

15 A No.

16 Q Okay. We talked a lot about the asterisks
17 and/or missing data in Exhibits 8-2 through -8. I
18 think I got them all.

19 As you sit here today, can you personally
20 account for each of the changes reflected by an
21 asterisk? Can you personally explain each of the
22 changes that's represented by an asterisk in each of
23 those exhibits?

24 A I cannot do it right now.

25 Q Okay. You would have to talk to the

1 measurements group to do that?

2 A Yes.

3 Q Okay. And same question about the missing
4 data, the blank rows or columns in each of those
5 exhibits. As you sit here today, you can't personally
6 account for or explain why that data is missing or not
7 in those spreadsheets; correct?

8 A Right. I can't do that.

9 Q Okay. You would have to contact the
10 measurements group to do that?

11 A Yes.

12 Q Okay. As you sit here today, do you know what
13 was in each of the individual components of the gas
14 that leaked from the Aliso Canyon facility beginning on
15 or around October 23rd, 2015?

16 A No.

17 THE WITNESS: I'm sorry.

18 MR. JAMES: I was going to say outside the scope to
19 the extent it postdates the date of the PMQ topic.

20 BY MS. WIEMAN:

21 Q As you sit here today, do you know the
22 constituents of the natural gas that was stored at the
23 Aliso Canyon facility on October 22nd, 2015?

24 MR. JAMES: Asked and answered.

25 THE WITNESS: In Aliso -- well, it would be in the

1 data that we showed you for that October 22nd date.

2 BY MS. WIEMAN:

3 Q And is it your testimony that that is -- that
4 those are the only components or constituents of the
5 gas that leaked from the Aliso Canyon facility?

6 A That's what was in our storage gas at the
7 time.

8 Q And is that a yes?

9 A Well, that's the gas that was in our storage
10 zone at the time.

11 Q On October --

12 A Yes.

13 Q -- 22nd, 2015?

14 A Yes.

15 Q Okay. And there were no -- as you sit here
16 today, you aren't aware of whether there any
17 constituents or components of the gas that was in the
18 Aliso Canyon facility on October 22nd, 2015, besides
19 those that are in the data we discussed today?

20 A Yes.

21 MS. WIEMAN: Okay. All right. I don't have
22 anything else for you. I'm going to pass you off to --
23 someone.

24 VIDEO OPERATOR BROWN: The time is now 3:57. Going
25 off the record.

1 (Recess taken.)

2 VIDEO OPERATOR BROWN: The time is now 3:59. Back
3 on the record.

4

5 FURTHER EXAMINATION

6 BY MR. PARRIS:

7 Q I'm curious about this missing data. Are you
8 surprised by that?

9 A No.

10 Q No? Why not?

11 A I'm not surprised that you are curious. You
12 seem like a curious person.

13 Q Are you a curious person?

14 A Yes.

15 Q So are you curious as to why this data is
16 missing?

17 A Yes.

18 Q What is the significance of the missing data?

19 MR. JAMES: Calls for speculation.

20 BY MR. PARRIS:

21 Q Why do you -- why do you save that data?

22 MR. JAMES: Speak up.

23 THE WITNESS: Speak up. Okay.

24 What do you mean?

25 ///

1 BY MR. PARRIS:

2 Q Why does the company keep that data that's
3 missing? What's the significance of it?

4 A We keep the data.

5 Q Why? Why is it important that you measure it
6 in the first place?

7 A Oh. Well, we keep the data for measurement
8 purposes.

9 Q What purpose?

10 A For measurement, if we want to know what
11 volume of gas -- in this case, what volume of gas was
12 injected into the field, what volume of gas was
13 removed, and part of the volume measurement is, you
14 know, how much BTU was in the gas.

15 Q And the BTU always drops; right?

16 A I don't know what you are talking about.

17 Q Well, when you inject it, it has one BTU
18 level, and when you pull it out it seems to have a
19 lower level; right?

20 A I don't -- I don't know exactly.

21 Q Have you ever -- have you ever noticed that
22 that is consistently the case?

23 A No.

24 Q Okay. Has there ever been an effort by the
25 Southern California Gas Company to address the issue of

1 why the BTU level is different from what's injected and
2 what's withdrawn?

3 MR. JAMES: Calls for speculation. Outside the
4 scope. Assumes facts not in evidence.

5 MR. PARRIS: Not one of those is a valid objection.

6 Read the question back, please.

7 (Record read as follows:

8 "Question: Okay. Has there ever
9 been an effort by the Southern
10 California Gas Company to address the
11 issue of why the BTU level is different
12 from what's injected and what's
13 withdrawn?")

14 THE WITNESS: So that's --

15 MR. JAMES: Same objection.

16 THE WITNESS: So that's not my -- that's not -- I'm
17 not part of the storage, so that wouldn't be one of the
18 things I would be doing.

19 BY MR. PARRIS:

20 Q Okay. Do you have anything to do with keeping
21 track of the volume of the gas that's in the formation?

22 A No.

23 Q Or keeping track of the volume of gas that's
24 injected?

25 A No.

1 Q How do they measure the amount of gas in the
2 formation at any given time?

3 MR. JAMES: Outside the scope. Calls for
4 speculation.

5 THE WITNESS: I don't know.

6 BY MR. PARRIS:

7 Q Okay. As the principal engineer of the
8 chemical environmental [sic] department, what role does
9 your department have in -- what role does your
10 department have in keeping track of the toxic gases
11 that are actually delivered to the customer?

12 MR. JAMES: Misstates her testimony. Assumes facts
13 not in evidence. Outside the scope.

14 THE WITNESS: So -- can you rephrase your question?

15 BY MR. PARRIS:

16 Q What is it you don't understand?

17 A Can you repeat the question?

18 MR. PARRIS: Yes.

19 Would you read the question back, please.

20 (Record read as follows:

21 "Question: Okay. As the principal
22 engineer of the chemical environmental
23 department, what role does your
24 department have in -- what role does
25 your department have in keeping track of

1 the toxic gases that are actually

2 delivered to the customer?")

3 MR. JAMES: Same objection.

4 THE WITNESS: So we don't do whatever you just

5 said.

6 BY MR. PARRIS:

7 Q You don't deliver toxic gasses to the

8 customer; is that your testimony?

9 A We don't.

10 Q It is all toxic; isn't it?

11 A No.

12 Q Methane is toxic; right?

13 MR. JAMES: Assumes facts not in evidence. Outside

14 the scope. Calls for expert testimony.

15 THE WITNESS: That would be a question that

16 wouldn't be my function. That would be a question for

17 our safety department.

18 BY MR. PARRIS:

19 Q So just what does the chemical environmental

20 department do?

21 A So we are in the laboratory.

22 Q Right.

23 A So we do the chemical environmental testing

24 for the company.

25 Q Have you ever asked why you are doing it?

1 MR. JAMES: Outside the scope.

2 THE WITNESS: I mean, it is -- our job is to test.

3 BY MR. PARRIS:

4 Q Have you ever asked the purpose of testing,
5 what's the reason you do it?

6 MR. JAMES: Outside the scope. Asked and answered.

7 THE WITNESS: So when we do tests, we will ask why
8 it is done, yes, what is the scope, why is it being
9 done.

10 BY MR. PARRIS:

11 Q What do you understand the purpose of the
12 chemical environmental department at Southern
13 California Gas to be?

14 MR. JAMES: Misstates her testimony.

15 THE WITNESS: So we provide a service, a laboratory
16 service, to the company. We do chemical and
17 environmental testing.

18 BY MR. PARRIS:

19 Q Of whatever is asked of you?

20 A Whatever is necessary for the company.

21 Q I thought it was for whatever is necessary to
22 protect the safety and well-being of the public.

23 A Yes, it is. So we test for what's necessary
24 for the company to meet the specs, to make sure it is
25 safe to use, to make sure it is safely delivered to

1 customers.

2 Q It sounds to me that there's an underlying
3 premise to your department that it doesn't really
4 matter a great deal what's in the gas if it is going to
5 be burned, if it is going to burn up when you use it;
6 is that right?

7 MR. JAMES: Misstates her testimony.

8 THE WITNESS: No. So we do make sure that the gas
9 not only is a proper quality to be used but also a
10 proper quality if there's exposure to our employees or
11 customers.

12 BY MR. PARRIS:

13 Q Okay. So that is under the purview of your
14 department in regards to exposure to the gas for any
15 reason; correct?

16 A Well, the gas-quality specs should be
17 protecting the exposure of --

18 Q I'm sorry, what?

19 A So our gas-quality specifications will protect
20 what gas we receive so that it could be properly used,
21 you know, in our pipeline by our customers, or if there
22 was any exposure to our employees or the public.

23 Q Okay.

24 A I'm not saying that's necessarily -- I don't
25 know -- what was -- that's what we do. We set the

1 specifications, and we also will set what should be
2 tested and how frequently it should be, you know,
3 monitored or tested.

4 Q Is that company-wide, whatever testing is
5 going to take place, you set that?

6 A It is a company standard, yes.

7 Q I'm sorry, what?

8 A Yes.

9 Q Okay. So what do you do to test -- what's a
10 gas upset?

11 A In what context?

12 Q Well, there's a term you used called a gas
13 upset; right?

14 A Can you show me in what context?

15 Q Do you know what it means?

16 A Can you show me -- it depends on what context
17 you mean. I don't know what you are saying, what --

18 Q Well, isn't there a scenario of a gas upset
19 that requires a response from your department?

20 A I don't know what you mean.

21 Q You never heard that?

22 A I don't know what you mean by gas upset.

23 Q Okay. Thank you.

24 You have never heard that before?

25 A It just means -- in what context were you

1 reading? Can you show me?

2 Q Eventually. Eventually I will, yes. But I
3 want to know before I do what you understand it to be.

4 MR. JAMES: Asked and answered.

5 BY MR. PARRIS:

6 Q Do you know?

7 A It depends what the context is. I don't know.

8 Q Okay. Within the context of the Southern
9 California Gas Company, if you heard the term "gas
10 upset," do you have any idea what that means?

11 MR. JAMES: Outside the scope.

12 THE WITNESS: No. I can't -- if you just say it, I
13 don't know what you mean.

14 BY MR. PARRIS:

15 Q Okay. Is there such a thing as a term "gas
16 upset" that triggers your department doing testing at
17 the customer's site?

18 MR. JAMES: Outside the scope.

19 THE WITNESS: I don't know.

20 BY MR. PARRIS:

21 Q You don't know?

22 A I don't know. You have to show me.

23 Q Okay. What do you want me to show you?

24 A I don't know. You are reading it. You got
25 the gas upset.

1 Q No, you don't get to do that. I get to read
2 whatever I want to and ask you questions about it. If
3 you don't know the answer, just tell me you don't know
4 the answer.

5 Is it your testimony you don't know what a gas
6 upset is?

7 A In the way --

8 MR. JAMES: Misstates her testimony. She is here
9 as the PMQ for a specified topic. If you want to ask
10 her questions about that topic within the date range
11 specified --

12 MR. PARRIS: Counsel, don't raise your voice at me.

13 MR. JAMES: -- please do so.

14 MR. PARRIS: Do not raise your voice at me.

15 MR. JAMES: Don't raise your voice at the witness.

16 MR. PARRIS: I don't think I am, but you do not --

17 MR. JAMES: I think you are.

18 MR. PARRIS: Under any circumstance, you do not get
19 to raise your voice to me.

20 MR. JAMES: And you don't get to raise your voice
21 at the witness.

22 BY MR. PARRIS:

23 Q Did you think I was raising my voice at you?

24 A Yes.

25 Q Okay. Thank you. I will apologize, and I do

1 apologize, and I will try to control it.

2 MR. PARRIS: Counsel, are we clear? I am not going
3 to work in a hostile environment with you yelling at
4 me. It frightens me. It causes my blood pressure to
5 rise, and it endangers my life. Are we clear? Stop
6 it. All right?

7 MR. JAMES: I have heard you.

8 MR. PARRIS: Thank you.

9 MR. JAMES: We can continue.

10 BY MR. PARRIS:

11 Q Is it your testimony that you have never heard
12 the terminology "gas upset" in regards to your role as
13 the principal engineer in the chemical environmental
14 department of the gas company?

15 MR. JAMES: Asked and answered. Misstates her
16 testimony.

17 THE WITNESS: I don't recall.

18 BY MR. PARRIS:

19 Q You don't recall ever hearing that?

20 A Not right now. I don't recall.

21 Q Is there something about right now that makes
22 it impossible for you to recall?

23 A No. I just don't recall.

24 Q Okay. So there's -- what can I do to give you
25 a hint as to what it is? I'm asking.

1 A I was here to give a deposition on gas
2 composition. I can't recall right now.

3 Q Did your counsel tell you to say that --

4 A No.

5 Q -- when I asked those questions that --

6 A I don't recall. This is in my head. I just
7 don't recall right now.

8 Q Has anybody told you to lie in this
9 deposition?

10 A No.

11 Q It would be a lie if you said something that
12 wasn't true knowingly; wouldn't it?

13 A Correct.

14 Q Okay. Are you familiar with the procedures
15 and policies of the gas company, Southern California
16 Gas Company, when it comes to the testing of volatile
17 substances?

18 MR. JAMES: Calls for speculation. Outside the
19 scope.

20 THE WITNESS: I am not -- it depends on what the
21 standard is. I'm not familiar with all of the gas
22 standards.

23 BY MR. PARRIS:

24 Q Okay. So you are not familiar with managing
25 gas-quality upsets?

1 MR. JAMES: Outside the scope.

2 BY MR. PARRIS:

3 Q Is that true?

4 A I am here for this. It depends on --

5 Q No. You are really here to tell the truth.

6 A I understand. I don't recall.

7 Q So you don't recall if you have ever been

8 trained on what to do when there's a gas-quality upset;

9 is that correct?

10 MR. JAMES: Asked and answered. Outside the scope.

11 THE WITNESS: You know, it depends on what context

12 and how you -- what is meant by gas-quality upset,

13 and --

14 BY MR. PARRIS:

15 Q I'm just wondering about your level of

16 training. You are the principal engineer; is that

17 right?

18 A Yes.

19 MR. JAMES: Misstates her testimony.

20 BY MR. PARRIS:

21 Q Who else would be responsible for testing the

22 product at the customer's site when there's a

23 gas-quality upset if not you?

24 A It would be --

25 MR. JAMES: Vague and ambiguous as to "gas upset."

1 THE WITNESS: It depends on what the gas upset is
2 and if -- if it is at a customer site, if we are asked
3 to test for it, we would test for it. But I don't know
4 what's meant by gas-quality upset.

5 BY MR. PARRIS:

6 Q Okay. Fair enough.

7 Is there anyone else in the company, any other
8 department, that would be called in to do the testing
9 of the gas at the customer website if there was a
10 concern about its safety?

11 MR. JAMES: Objection. Vague and ambiguous.
12 Customer website?

13 MR. PARRIS: I'm sorry, customer site.

14 THE WITNESS: Customer site.

15 MR. PARRIS: Yeah.

16 THE WITNESS: If there's -- I'm not aware of who
17 would be testing. It would depend on what you are
18 asking about and where the site is and which customer
19 it is and --

20 BY MR. PARRIS:

21 Q Go on.

22 A Yeah.

23 Q If they became concerned about the safety of a
24 gas in a particular neighborhood, are you aware of any
25 procedure for your department to do any testing?

1 A No.

2 Q Okay. Thank you.

3 Who was the director of transmission back in
4 2015?

5 MR. JAMES: Outside the scope.

6 THE WITNESS: I don't know.

7 BY MR. PARRIS:

8 Q There's a notation here for the EAC personnel.
9 Do you know what that means?

10 A Yes. That would be someone in our Engineering
11 Analysis Center.

12 Q I'm sorry, what is that?

13 A It would be somebody in our Engineering
14 Analysis Center. A person. A person.

15 Q Is that connected to your department at all?

16 A It may be. It depends on what was needed to
17 be tested.

18 Q If it is the gas?

19 A If it is the gas, yes. Yes, we would be
20 testing it.

21 Q And there's only one -- is it principal
22 engineer?

23 A Correct.

24 Q And that's you?

25 A Correct. But there's other people in our

1 department.

2 Q Okay. Is there anybody over you that would
3 oversee the testing?

4 A Well, we have our team leader that would
5 oversee us.

6 Q That's your boss; right?

7 A Yes.

8 Q Anyone else?

9 He doesn't actually do testing; right?

10 A Right. He would assign someone to go do the
11 testing.

12 Q Okay. And that would be somebody who reports
13 to you; right?

14 A No.

15 Q Explain that hierarchy to me.

16 A Our team lead is in charge of all employees in
17 our team, and he assigns who does the testing.

18 Q Okay. So in your team there's a principal
19 engineer, which is you. Who else is on your team?

20 A We have technicians that would go out and do
21 the actual sampling and the testing.

22 Q And do they have any reporting function to the
23 principal engineer?

24 A No.

25 Q And do you have any oversight of the

1 technicians?

2 A Oversight. No.

3 Q Okay. So what do you do?

4 A We -- I provide, you know, what tests need to
5 be done, or we revise procedures or give them the
6 testing procedures to follow.

7 Q So --

8 A We actually write out the job requests for
9 them.

10 Q You are the person people look to to determine
11 what testing procedures should be in place; right?

12 A Yes.

13 Q In any type of event involving the quality of
14 the gas; is that correct?

15 A Not necessarily, but if I have to -- you know,
16 it depends on what it is, and I would -- not all the
17 procedures. So --

18 Q What procedures would you not be involved in?

19 A It just depends on what's assigned to me.
20 There's, like, several procedures in our group, so
21 whoever is in charge of that procedure has to revise it
22 and make sure it is okay.

23 Q So is there somebody else in your group that's
24 in charge of testing procedures for the composition of
25 the gas other than you?

1 A It would depend on the actual procedure, yes.

2 Q Give me some examples of procedures you have
3 no involvement in.

4 A It is not that I don't have particular
5 involvement in it. It would be, like, if it is
6 assigned to that person, they would have to revise it.
7 We get a chance to review what he revised and all that.
8 So I don't know off the top of my head which -- you
9 know, which procedures I am in charge of and which I'm
10 not. It changes.

11 Q Do you remember on the day of the blowout or
12 within days of the blowout the news reporting that the
13 benzene levels had not changed in the community?

14 MR. JAMES: Outside the scope.

15 THE WITNESS: No.

16 BY MR. PARRIS:

17 Q Do you remember reading that there was no
18 benzene in the natural gas at Aliso Canyon?

19 MR. JAMES: Outside the scope.

20 THE WITNESS: I don't know. No.

21 BY MR. PARRIS:

22 Q If you had read that, you would know that was
23 a lie; isn't that true?

24 MR. JAMES: Outside the scope. Argumentative.

25 Assumes facts not in evidence.

1 THE WITNESS: I wouldn't know.

2 BY MR. PARRIS:

3 Q You don't know that there's benzene in the
4 natural gas matrix at Aliso Canyon?

5 A At that point in time, all we would know is
6 what was in the C6+, and I wouldn't know if it was
7 there or if it wasn't there or if there was a trace
8 amount.

9 Q So what did you do to find out when the
10 blowout happened?

11 MR. JAMES: Outside the scope.

12 THE WITNESS: That is not one of the things I did.

13 BY MR. PARRIS:

14 Q That's not one --

15 A I didn't do anything.

16 Q The reason I'm curious --

17 A I don't recall. I already said I didn't
18 recall.

19 Q That doesn't get you off the hook.

20 The L.A. Times reported that the State Office
21 of Environmental Health Hazard Assessment has reviewed
22 the air sampling data collected by the gas company and
23 concluded the levels of --

24 MR. PARRIS: Do not touch her and signal her again,
25 Counsel.

1 BY MR. PARRIS:

2 Q -- by the gas company and concluded that the
3 levels of benzene and other air toxics detected in the
4 community are below the level of concern for chronic
5 health effects, and they -- and that any increase in
6 cancer risk is very -- is likely very small.

7 Did that come from your department?

8 MR. JAMES: The statement speaks for itself. It is
9 outside the scope as well as dealing with air sampling,
10 not gas composition.

11 BY MR. PARRIS:

12 Q Does your department do anything with air
13 sampling?

14 A We do gas sampling.

15 Q I'm sorry, what?

16 A We do gas sampling. We have other departments
17 that will do what's in -- I don't even think if we have
18 departments that does what's inside -- what's in the
19 air.

20 Q Say that again.

21 A So we do -- we sample for gas.

22 Q Yeah.

23 A We don't actually -- we don't usually sample
24 for what's in the air.

25 Q Okay.

1 A We sample what's in the gas.

2 Q Have you ever been party to a discussion in
3 the company about sampling the air quality in the
4 Porter Ranch area?

5 A No.

6 Q That's never been a subject the company has
7 discussed, to your knowledge; is that correct?

8 MR. JAMES: That's outside the scope. Had you read
9 the PMQ notice, you would know that that is a separate
10 set of PMQ topics for a later deposition.

11 BY MR. PARRIS:

12 Q He is just being a lawyer. You have to answer
13 my question.

14 A I'm not involved with air testing.

15 Q I'm sorry, what?

16 A I'm not involved with the testing in the air.

17 Q Okay. But I'm asking you: Are you aware of
18 any department in Southern California Gas Company prior
19 to October 23rd, 2015, that did test the air quality
20 around the facility, any facility operated by Southern
21 California Gas Company?

22 MR. JAMES: Outside the scope.

23 THE WITNESS: I don't know.

24 BY MR. PARRIS:

25 Q You are not aware of any; is that right?

1 A I'm not familiar with it.

2 Q Okay. So as the principal engineer of
3 Southern California Gas Company's chemical and
4 environmental department, you have never even heard
5 that the company has a department that ever tests the
6 air quality --

7 MR. JAMES: Misstates her testimony. Outside the
8 scope.

9 BY MR. PARRIS:

10 Q -- around the plant; is that right?

11 A It is outside of my -- it is outside of our
12 group. And I'm not aware -- I'm aware of what's -- I'm
13 aware that we do have departments that will test what's
14 emitted from our plants but not just air in general.
15 It would be outside of my -- outside of our group.

16 Q Okay. When you say you are aware of
17 departments that measure what's emitted, what do you
18 mean by that?

19 A Just the regular emissions test, air-quality
20 emissions testing from our power plants. I'm aware
21 that we do do it, but that's the only air testing that
22 I'm familiar with or know about.

23 Q Okay. You say you are aware that "we do do
24 it." Does that mean there's a department inside the
25 company that does it other than you?

1 A Well, just for -- just for how our -- how
2 our -- when we test -- we do have a department that
3 will test after you burn the gas what's -- you know,
4 what's in that emission product.

5 Q Okay.

6 A We do have that. As for anything else, I'm
7 not aware of a group doing that.

8 Q Were you aware of fenceline testing? Have you
9 heard that term before?

10 MR. JAMES: It is outside the scope.

11 THE WITNESS: So, yeah, it is outside of what I'm
12 here for.

13 BY MR. PARRIS:

14 Q That's not what I asked you.

15 A I'm vaguely aware of that. I can't answer
16 that here.

17 Q Okay. You, as the principal engineer of the
18 Southern California Gas Company's chemical
19 environmental department, have no knowledge whatsoever
20 about fenceline testing that the company may or may not
21 do; is that correct?

22 MR. JAMES: Outside the scope. Misstates her
23 testimony.

24 THE WITNESS: Yes. I am only aware of what -- I'm
25 here for what's tested in the gas.

1 BY MR. PARRIS:

2 Q And you are not -- your department is not
3 concerned with what happens to that gas after it
4 leaves -- what? When do you lose sight of it?

5 MR. JAMES: Misstates her testimony. Outside the
6 scope.

7 BY MR. PARRIS:

8 Q When do you stop testing?

9 MR. JAMES: Vague and ambiguous.

10 THE WITNESS: Stop testing what?

11 BY MR. PARRIS:

12 Q The gas.

13 A We test the gas.

14 Q No. You said after -- at some point you are
15 not concerned with it. I mean, it is still gas; right?
16 If there's a leak and it leaks into the environment, it
17 is still gas; isn't it? And it is still your company's
18 gas; isn't it?

19 A Yes.

20 Q Okay. And once that happens, nobody in the
21 company is charged with the responsibility of testing
22 that gas; is that correct?

23 MR. JAMES: Misstates her testimony. Outside the
24 scope.

25 THE WITNESS: So I'm here to test -- I'm here to

1 give you information about testing and the gas. If we
2 test for whatever you are mentioning, I can't tell you
3 exactly or how we do it or how --

4 BY MR. PARRIS:

5 Q Or even if you do it; is that right?

6 A Well, I'm -- I don't -- you know, if we did
7 it, I can't tell you, you know, how we did it or what
8 was done. I can't tell you anything about that.

9 Q But you are in charge of all the company's gas
10 chromatographs; right?

11 A No.

12 Q You are not? Who is?

13 A The people that maintain the gas
14 chromatographs is in charge of our company's gas
15 chromatographs. So it is whatever -- whoever is
16 assigned.

17 Q I thought you decided which ones they bought.

18 A That's correct. Yes.

19 Q And you are responsible for the maintenance
20 procedures; right?

21 A Yes.

22 Q Is that right?

23 A Oh. No. The maintenance procedures would
24 come from each individual gas chromatograph.

25 Q The company that you bought it from?

1 A Right. And so, you know, whoever is
2 maintaining it is responsible to maintain the gas
3 chromatograph per, you know, what the manufacturer
4 says.

5 Q In the last 20 years, has the Southern
6 California Gas Company in California bought any new gas
7 chromatograph models other than what you have told me
8 about?

9 A Yes.

10 Q Which ones?

11 A For the online monitors?

12 Q Or anything.

13 A For the online gas chromatographs, we have
14 bought from other manufacturers before in the last
15 20 years. For online, yes. So we bought -- I don't
16 know what -- it is the NGC. I don't know exactly what
17 it is right now.

18 Q Why not?

19 A It's not off the top of my head. It is like
20 the NGC 8206.

21 Q When was that purchase made?

22 A There's -- we purchased them. I don't know
23 when exactly every single one of them were purchased.

24 Q Have you phased out the Emerson line?

25 A No.

1 Q These are just in addition to Emerson's --

2 A Yes.

3 Q -- model? Is that right?

4 A Yes.

5 Q Okay. Thank you.

6 What was the reason for changing to a
7 different model or a different manufacturer?

8 A We are always looking for new gas
9 chromatographs. We are always looking, just in general
10 looking for what analyzers are out there.

11 Q Are you familiar with method 325A or B for
12 sampling volatile organic compounds?

13 A No.

14 (The document referenced below was
15 marked Deposition Exhibit 8-10 for
16 identification and is appended hereto.)

17 BY MR. PARRIS:

18 Q Directing your attention to Exhibit 8-10, have
19 you ever seen that document before?

20 Have you ever seen the first page of the
21 document before?

22 Uh-oh, you are going to run the clock. Okay.

23 You have had time to read it all.

24 A Yes.

25 Q Do you recognize the document?

1 A No.

2 Q Okay. So the principal engineer of Southern
3 California Gas Company chemical and environmental
4 department has never seen the protocol for managing
5 gas-quality upsets. Is that your testimony?

6 A I'm saying --

7 MR. JAMES: I'm going to object that the question
8 is outside the scope as to topic and time period for
9 the PMQ.

10 BY MR. PARRIS:

11 Q Is that accurate?

12 A No. I don't recall.

13 Q You don't recall?

14 A I'm not saying -- I don't remember seeing it.
15 I may have, I just don't recall.

16 Q Okay.

17 A It is 2000 -- oh, it was revised in 2000.
18 That's 18 years.

19 Q Aren't there lots of procedures and protocols
20 the company has that the last revision would have been
21 18 years ago?

22 A This is --

23 MR. JAMES: Calls for speculation. Outside the
24 scope.

25 THE WITNESS: I don't -- okay. I really don't know

1 where this is at or where it is located. So I don't
2 recall seeing this, and I don't know where this is
3 found.

4 BY MR. PARRIS:

5 Q Okay. The reason I'm curious is because it
6 says that:

7 "The trigger for transmission
8 notification of an upset traditionally
9 has stemmed from significant increase in
10 customer leak and odor compliance."

11 Do you see that?

12 A Yes.

13 Q "Gas Operation should be consulted
14 to provide an understanding of the
15 system flow patterns. This in tandem
16 with geographic locations of customer
17 complaints can direct field teams to
18 inspect and test likely sources with
19 little delay."

20 Right?

21 A Yes.

22 Q Now, the reason it is important when customers
23 start complaining about odors, it could be mercaptans
24 or it could be hydrogen sulfide; isn't that true?

25 A So when we look at customer leak complaints,

1 that means the customer inside their house is
2 complaining that there might be a leak in their house.

3 It is not necessarily -- I don't know what
4 you're -- I'm just saying it is usually when a customer
5 calls in a leak to us, we need to respond because
6 there's a leak in their house, and, therefore, it is a
7 leak inside the house.

8 And it is sometimes caused by an increase, an
9 odor in the gas. So if you just had a slight -- a
10 small initially -- or if there's a change in odor, they
11 might notice that they didn't notice before, but it is
12 not necessarily a leak leak. You just turn on your gas
13 stove, like, oh, I smell something different and they
14 think it is a leak.

15 Q You are describing a scenario involving one
16 individual customer; aren't you?

17 A Well, when we get a lot of complaints and we
18 can follow it through the pipeline, we -- it could be
19 more -- that's when it is a concern for us, right, when
20 there's a significant increase.

21 Q So are you remembering what this --

22 A No, I don't know what this is. I'm just -- I
23 shouldn't have said what this is. I don't --

24 Q On page 2 where it says, "Phase I testing
25 includes the gathering of gas samples, odorometer

1 tests, Draeger sampling at customer sites" -- plural,
2 sites -- "gas producers and suppliers."

3 That's your department; isn't it?

4 A It could be.

5 Q Whether you gather it or not, you are the only
6 department, to your knowledge, that would perform that
7 testing; isn't that true?

8 A No. It could be wherever this is from.

9 Q Explain that.

10 A It could be from our field technicians under
11 Note. That's not what we call our technicians. Ours
12 is laboratory technicians. So there could be --
13 according to this note, it could be a field technician
14 at this site.

15 Q They wouldn't actually do the testing; would
16 they?

17 A They would grab a sample. They could do
18 testing with the odorometer, they could do Draeger
19 samples. So this is for -- that's why we don't -- I
20 don't recognize this. It is for the field.

21 Q Okay. So you don't become involved in the
22 testing at the customer site when there's an uptick of
23 customer complaints of smelling gas; is that correct?

24 A No, I didn't say -- no, not exactly, unless,
25 you know, we have to go out there and, you know, assist

1 and support the testing. We would go out there.

2 Q Have you ever had to do that?

3 A Not me.

4 Q Do you see where it says "Phase I Test
5 Locations" where it says "obtain bag samples"? What
6 does that mean?

7 A Those are Tedlar bag samples.

8 Q I'm sorry, what?

9 A Those are Tedlar bag samples.

10 Q Describe that to the jury.

11 A It is a -- it is a Tedlar -- it is a bag made
12 out of Tedlar where we could pull a sample into a bag.
13 Instead of like a stainless steel cylinder, it just
14 goes into a bag. You would use it for low pressures
15 or, you know, residential, commercial customers,
16 because they would be at low pressures. So there
17 wouldn't be enough samples to take into a stainless
18 steel cylinder.

19 Q Okay.

20 A It would have no pressure, so you would have
21 to have a way to extract it.

22 Q What do you mean extract it?

23 A To extract it and then inject it into our GC.
24 So it would be easier to take it out from a bag sample.

25 Q I see. Is that something your department

1 would do, or are there other departments that can do
2 that?

3 A No. We could do it or other people -- other
4 people can do the sampling of it.

5 Q What other people?

6 A Other field technicians, it says here.

7 Q So is it my understanding, then, that there
8 are field technicians throughout the company that can
9 do the testing of gas after it leaves the pipeline?

10 A After it leaves the pipeline?

11 Q Yeah. I mean, are you going after the
12 customer --

13 A No. It would be from a pipeline, even at the
14 customer site. It is actually probably at the meter.
15 It would be from the pipe, you would collect a sample.

16 Q Okay. I see. So it is not just a bag of air
17 in the customer's home or something; right?

18 A It would be up to the customer. So we
19 would -- we normally -- well, there's not enough
20 pressure, so we normally would pull the sample from the
21 pipe before it hits the customer because it would be
22 regulated down to a lower pressure. We prefer to pull
23 it, you know, from the pipe before it is regulated
24 down.

25 Q And what other departments in the company have

1 responsibility for testing those bags?

2 A They are not -- they are not responsible for
3 testing. They are responsible -- they grab a bag
4 sample, and they would deliver it to us to analyze it.

5 Q Okay. So on a Phase I test location, when
6 they use a bag to collect the low-pressure gas, that is
7 always taken to your department; isn't that correct?

8 A I don't know if it is always taken to our
9 department. It --

10 Q It is supposed to be?

11 A Well, it could be taken to our department or
12 it could be taken to an outside lab. It just depends
13 on what's needed to be tested for.

14 Q So when do you decide to use an outside lab
15 instead of the company doing the testing, meaning your
16 department?

17 MR. JAMES: Outside the scope. Calls for
18 speculation.

19 THE WITNESS: Yeah. It is not up to me to decide.

20 BY MR. PARRIS:

21 Q So what's the policy and procedure of your
22 department?

23 A It is not --

24 MR. JAMES: Outside the scope. Calls for
25 speculation.

1 THE WITNESS: It is outside of us. It is not up
2 for me to decide.

3 BY MR. PARRIS:

4 Q It is not up to the principal engineer to have
5 any input in that decision?

6 A It depends on what it is and who is in charge
7 of it and where they want to test it at.

8 Q You do not involve yourself in that in any
9 way; is that correct?

10 A In telling them where to go, it is up to the
11 person that is in charge. We could always say we could
12 test it or so-and-so can test it. They have the option
13 of where they want to test it.

14 Q Okay. Why is that? Why does it go outside of
15 the department for somebody else to decide?

16 A It is --

17 MR. JAMES: Outside the scope. Calls for
18 speculation.

19 THE WITNESS: I don't know. I'm guessing there,
20 but it would be up to whoever -- you know, the
21 project -- whoever is in charge of what the situation
22 is, it is up to them to decide.

23 BY MR. PARRIS:

24 Q On October 23rd, 2015, when you became aware
25 that there was a problem at SS-25, did your department

1 have any involvement whatsoever in testing the gas from
2 that point on?

3 MR. JAMES: Outside the scope.

4 THE WITNESS: So --

5 MR. JAMES: Vague and ambiguous.

6 THE WITNESS: Can you be more specific? I -- I
7 wasn't asked to do the test, so can you be more
8 specific? If it is our department, I wouldn't know
9 exactly what the test is.

10 BY MR. PARRIS:

11 Q I'm asking you what you do know.

12 A I don't know exactly what was tested after or,
13 you know, during the leak.

14 Q So during the entire time of the blowout,
15 before they were able to bring it under control, are
16 you aware of your department testing the gas at any
17 time?

18 MR. JAMES: Outside the scope. Vague and
19 ambiguous.

20 THE WITNESS: It depends on -- I don't know
21 which -- you know, what you are talking about, what
22 specific test, if I've actually looked at it or not or
23 if I could have --

24 BY MR. PARRIS:

25 Q Any test.

1 A I just don't recall, like, any test. I don't
2 know what tests you are talking about.

3 Q Okay. So an entire community, 30,000 people
4 minimum were affected, and you have no memory of any
5 type of testing that the chemical environmental
6 department conducted during that episode? Is that your
7 testimony?

8 A No. I don't know specifically what was
9 tested. I know we did do some testing, I just don't
10 know what was specifically tested, what was
11 specifically tested for. That's for someone else to be
12 the person here.

13 Q The fallback?

14 A Well, no. It is whoever -- you know,
15 whoever -- it is whoever is supposed to be, you know,
16 the most qualified person to tell you.

17 Q Do you know who in your department did any
18 testing of the SS-25 blowout incident?

19 MR. JAMES: Outside the scope.

20 THE WITNESS: I don't know exactly who. I know we
21 were involved. I just don't know exactly who and what
22 testing you are talking about.

23 BY MR. PARRIS:

24 Q Okay. What do you know about your
25 department's involvement?

1 A I just know we were involved, and I can't tell
2 you who exactly did all the testing.

3 Q So how do you know you were involved?

4 A I know I wasn't involved.

5 Q They didn't involve the principal engineer; is
6 that correct?

7 A Correct. Right.

8 Q Did they involve any technicians?

9 A I don't know. You know, it depends on what
10 was going on.

11 Q Were you curious as to why the principal
12 engineer was not involved in any way?

13 A This was -- I do gas-quality testing. I do
14 what's inside the pipeline, what's supplied to us. So
15 I was not assigned to do other testing that would --
16 that. So I didn't ask. It was just you are assigned,
17 you know, you do this. If I was told to do it, I
18 would, but I wasn't given that task.

19 Q Were you consulted?

20 A No.

21 Q Now, you do know that they farmed it out to an
22 independent company to test in around the
23 neighborhoods, the air quality.

24 MR. JAMES: Outside --

25 ///

1 BY MR. PARRIS:

2 Q Is that true?

3 MR. JAMES: Outside the scope. Calls for
4 speculation.

5 THE WITNESS: No, I didn't know for sure. I don't
6 know.

7 BY MR. PARRIS:

8 Q I'm not asking if you know for sure.

9 A I don't even know who they went to, yeah.

10 Q All you know is your department didn't do it?

11 MR. JAMES: Outside the scope.

12 THE WITNESS: I just know --

13 MR. JAMES: Calls for speculation.

14 THE WITNESS: -- I didn't do it.

15 BY MR. PARRIS:

16 Q Okay. And you had no input as the principal
17 engineer of the company; is that correct?

18 MR. JAMES: Asked and answered. Calls for
19 speculation. Outside the scope.

20 MR. PARRIS: Okay. I got your objection, but I
21 don't want you to screw up the tape. Okay?

22 BY MR. PARRIS:

23 Q As the principal engineer for Southern
24 California Gas Company's chemical environmental
25 department, you have no knowledge whatsoever of what

1 testing Southern California Gas Company did after the
2 blowout of SS-25; is that true?

3 MR. JAMES: Outside the scope. Calls for
4 speculation. Asked and answered.

5 THE WITNESS: Okay. So, as I said before, I just
6 know what was said in the public. So what we -- so
7 if -- so, you know, if that's what we said in the
8 public, then that's all I'm aware of. I didn't see the
9 actual results or what -- if it wasn't -- you know, I
10 think it was documented on the websites; right?

11 BY MR. PARRIS:

12 Q Well, there was a little bit of dispute about
13 how well it was documented; wasn't there?

14 A I don't know.

15 Q Okay. Thank you.

16 When you're dealing with a Phase I -- when
17 you're dealing with a gas-quality upset, if you look at
18 the exhibit in front of you, it says that:

19 "Field technicians shall acquire
20 bag samples, odorometer and Draeger
21 samples from suspected producer sites
22 and pressure-limiting stations."

23 What does that refer to?

24 MR. JAMES: Outside the scope. Calls for
25 speculation.

1 THE WITNESS: Yeah. Which part of it? I didn't
2 write this document.

3 BY MR. PARRIS:

4 Q What are pressure-limiting stations?

5 A I'm glad you asked. No, I don't know exactly
6 what it is.

7 Q Do you have a vague idea what it is?

8 A The vaguest. I don't want to -- I can't tell
9 you exactly.

10 Q Okay. And it says:

11 All test results are forwarded to
12 Emergency Command Post. It is
13 recommended that the ECP coordinate and
14 transfer -- transport (pickup and
15 delivery) samples to the EAC.

16 That's your department; right?

17 A The EAC is our department, yes.

18 Q And then it says:

19 "The initial visit to producer
20 sites shall provide the opportunity to
21 obtain gas samples to inspect
22 odorization and gas monitoring equipment
23 at the site. Gas samples shall be taken
24 in a location on the piping that the
25 sample is representative sample of the

1 product being received into Southern
2 California system to avoid dead spots in
3 piping."

4 What does that mean?

5 A Which part?

6 Q That whole sentence.

7 A That whole sentence you just read? I don't
8 know. What does that mean?

9 MR. JAMES: Outside the scope. Calls for
10 speculation.

11 THE WITNESS: Someone else wrote this.

12 BY MR. PARRIS:

13 Q That whole paragraph is about taking samples
14 from the various parts of a pipeline and taking them to
15 your lab; isn't that true?

16 MR. JAMES: Calls for speculation. Outside the
17 scope.

18 THE WITNESS: That last sentence where it says
19 "Samples to EAC" means it is to our lab.

20 BY MR. PARRIS:

21 Q And this is something that's triggered by
22 customer complaints of smell; isn't that right?

23 A That's what it says. I'm not -- this is not
24 my document.

25 Q No, I get that.

1 A Yeah. I didn't write this.

2 Q Are you aware that in the Porter Ranch area
3 for decades there were complaints constantly about the
4 smell of the gas in the neighborhood?

5 A No.

6 Q Are you aware of whether or not there was ever
7 an attempt to educate the public in the Porter Ranch
8 area about the necessity of reporting gas smells to the
9 gas company?

10 MR. JAMES: Outside the scope. Assumes facts not
11 in evidence.

12 THE WITNESS: No.

13 MR. PARRIS: Thank you.

14 BY MR. PARRIS:

15 Q Are you familiar with the term "habituation"
16 when it comes to the smell of gas or mercaptans or
17 hydrogen sulfide?

18 MR. JAMES: Outside the scope. Calls for expert
19 testimony.

20 THE WITNESS: No.

21 BY MR. PARRIS:

22 Q Have you ever heard that?

23 A I don't know -- I don't know. I've never
24 heard the word "habituation."

25 Q You have never been told that you -- after a

1 period of time of smelling hydrogen sulfide, you will
2 lose the ability to smell it?

3 A Not in those terms.

4 Q Are you familiar with that concept?

5 A Not for -- I'm not the expert on losing the
6 ability to smell H₂S. I know it has been written that
7 that's what might happen, but I'm not the person to
8 tell you anything more about it. So the question, yes,
9 I mean, it has been written somewhere.

10 Q Then it talks about Phase II.
11 "If the results from Phase I
12 testing are nonconclusive, expand test
13 locations as follows: Initiate gas
14 sampling at all remaining producer
15 sites."

16 What does that mean to you as the company's
17 principal engineer?

18 MR. JAMES: Outside the scope. Calls for
19 speculation.

20 THE WITNESS: So I would just -- I would just be
21 guessing on what that means.

22 BY MR. PARRIS:

23 Q What does it mean to you?

24 A It would just mean that they would test --
25 they would have been testing initially at the site, and

1 if there's a potential for other sources, they would go
2 further. But I don't know. I don't know why they
3 would say all this, like in this word. It just would
4 depend on where the gas was at -- or where the problem
5 was.

6 Q Is there some kind of federal regulation that
7 you are aware of or state regulation that requires a
8 gas-quality upset policy and procedure?

9 MR. JAMES: Outside the scope. Calls for
10 speculation.

11 THE WITNESS: I don't -- I don't know off the top
12 of my head, no.

13 BY MR. PARRIS:

14 Q And it says:

15 "Obtain gas samples from all major
16 supply and receipt points, Needles,
17 Blythe, Wheeler Ridge, and other major
18 supply interties."

19 Right?

20 A So this is someone's -- you know, when I talk
21 about a project manager or how they would manage, this
22 is what someone wants to be -- wants done; right?

23 Q Well, it sounds like something about an
24 emergent situation, they have an emergency command
25 post.

1 A Right.

2 Q Right?

3 A I don't know if they do.

4 Q That's all I'm trying to find out --

5 A Right.

6 Q -- that as the company's principal engineer of
7 the chemical environmental department, just what you do
8 know. And what you are telling me, you really don't
9 know anything at all about this; correct?

10 A Well, I didn't write the document. I don't
11 recall seeing this document. I mean, it is 2000. I
12 don't know -- I just don't -- you know, I don't recall
13 seeing this document. So it is hard for me to explain
14 to you what this means and why -- why they decided it
15 should be done this way.

16 Q Well, what that also indicates to me is that
17 you don't know what to test for either if this
18 procedure were to occur.

19 MR. JAMES: Misstates her testimony.

20 THE WITNESS: I don't think so. It is not --

21 BY MR. PARRIS:

22 Q What would you test for?

23 A It is not up to me. It would be what the
24 issue was; right? If it was odorization, then we would
25 test for the odorants in the gas.

1 Q What about hydrogen sulfide?

2 A That's included in the sulfur and the gas.

3 When we test for sulfur compounds, we test for sulfur
4 compounds. That seems clear.

5 Q So would you test for hydrogen sulfide?

6 A If we are testing for sulfur, it would be
7 included, yes.

8 Q If there's benzene in the natural gas matrix
9 and customers are smelling gas, they call in and say
10 "I'm smelling gas," they would also be breathing
11 benzene; wouldn't they?

12 A No.

13 MR. JAMES: Calls for speculation.

14 THE WITNESS: I don't know. Maybe it is not in the
15 gas.

16 BY MR. PARRIS:

17 Q If it is in the gas.

18 A Oh, if it is in the gas? It depends on how
19 much -- how much we are talking about. It's in the
20 gas, but how much of the gas is -- are they smelling?
21 If they smell gas, we don't know how much they are
22 smelling of the gas.

23 Q You know, the public relies on the gas company
24 to know that; don't they?

25 MR. JAMES: Outside the scope. Calls for

1 speculation.

2 THE WITNESS: I don't know what the public is
3 relying on. What do you mean? I'm testifying for the
4 public or?

5 BY MR. PARRIS:

6 Q The public relies on your department to know
7 if the gas they are smelling is life-threatening or
8 toxic to their health. Isn't that true?

9 MR. JAMES: Outside the scope. Calls for
10 speculation.

11 BY MR. PARRIS:

12 Q There is no one else in the company doing it?

13 MR. JAMES: Misstates her testimony.

14 THE WITNESS: No.

15 MR. JAMES: Outside the scope.

16 THE WITNESS: It is our safety department.

17 BY MR. PARRIS:

18 Q So what kind of testing does the safety
19 department do?

20 MR. JAMES: Outside the scope. Calls for
21 speculation.

22 THE WITNESS: I don't know exactly what other
23 testing or what testing they do.

24 BY MR. PARRIS:

25 Q Do you know if they do any testing at all?

1 A I know they do testing, yes.

2 Q Have you been to a safety department lab where
3 that testing takes place?

4 A No.

5 Q You have never seen such a lab; have you?

6 A Well --

7 MR. JAMES: Outside the scope.

8 BY MR. PARRIS:

9 Q I'm not laughing. I want to know how these
10 people were protected, and you are the only one that
11 can tell me so far.

12 A I'm just saying we test for the gas and we do
13 have a safety department that can go out or contract,
14 you know, for exposure testing.

15 Q Okay.

16 A I'm just saying I can't tell you what and who.

17 Q If the safety department wants to test it
18 internally, meaning within the company, that's your
19 department. Isn't that right?

20 A We would only be testing the gas if they come
21 to us.

22 Q Right. But you are the only department inside
23 the company they can come to. Isn't that accurate?

24 A If they wanted to come to us, they could. I
25 don't know who else they would go to.

1 Q You are not aware of anybody else in the
2 company they could go to to get the gas tested?

3 A It would --

4 Q Or the air quality tested; isn't that true?

5 A I'm sorry?

6 Q You don't know of any other department in the
7 company that they can bring air samples to to test
8 other than your lab or an outside contractor. Isn't
9 that correct?

10 A It would be the Engineering Analysis Center or
11 an outside contractor. I mean, it is not just our
12 section. It is the Engineering Analysis Center.

13 Q Okay. Does the engineering analysis section
14 have a lab independent of your lab?

15 A Well, we are made up of several different
16 labs. So, like I said, there's -- one of our labs will
17 do air emissions and one of the labs will test
18 materials, so.

19 Q But those labs are both part of the chemical
20 environmental department?

21 A No.

22 Q Isn't that true?

23 A No. That's not how it works. We have the
24 Engineering Analysis Center. We are just a section
25 under the Engineering Analysis Center.

1 Q Okay. So what other sections are there in the
2 company that do testing of gas samples or air samples?

3 MR. JAMES: Outside the scope.

4 THE WITNESS: I can't tell you.

5 BY MR. PARRIS:

6 Q You don't know?

7 A I can't tell you. I don't -- I don't know
8 exactly if there's testing done. You know, there's
9 emissions testing done out there, so.

10 Q Inside the company?

11 A For appliances, yes. For appliances.

12 Q Okay. But that's not what we are talking
13 about here; is it?

14 MR. JAMES: We have been going an hour and a half.
15 Let's take a break.

16 THE WITNESS: Yeah, I'm going to take a break. I'm
17 thirsty.

18 VIDEO OPERATOR BROWN: The time is now 5:00 P.M.
19 Going off the record.

20 (Recess taken.)

21 VIDEO OPERATOR BROWN: Time is now 5:16. Back on
22 the record.

23 BY MR. PARRIS:

24 Q Okay. Is it your understanding that you are
25 here to testify as to the gas composition for five

1 years leading up to the blowout of the SS-25?

2 A That was my initial understanding of why I was
3 brought in, yes.

4 Q Okay. So what made you believe that you were
5 only to testify to the gas composition while it was in
6 the pipeline or in the storage facility?

7 MR. JAMES: Calls for speculation. Potentially
8 calls for attorney-client privileged communications.

9 Instruct the witness not to disclose any
10 discussions she has had with counsel.

11 MR. PARRIS: Well, let me rephrase it.

12 BY MR. PARRIS:

13 Q When we asked you about the gas composition,
14 did you exclude from that once it leaves the pipeline
15 or once it leaves the storage facility?

16 A I was focused on what was the gas inside the
17 storage field.

18 Q Facility; right?

19 A Yes.

20 Q So when SS-25 blew out and an incredible
21 amount of gas is going into the environment, did you
22 not think you should know what the composition of that
23 gas was?

24 MR. JAMES: Outside the scope.

25 MR. PARRIS: Well, that's what I'm trying to find

1 out.

2 BY MR. PARRIS:

3 Q Did you exclude that from the scope of your
4 testimony?

5 A So --

6 MR. JAMES: Vague and ambiguous.

7 THE WITNESS: I provided the data that was asked
8 for. So what you are referring to isn't something that
9 I -- that's my -- that I was supposed -- that I was
10 focused on. I'm looking at the gas that's inside the
11 pipeline.

12 BY MR. PARRIS:

13 Q Okay. So you did not come here today to
14 testify as the company's person most knowledgeable
15 about the composition of the gas that leaked into the
16 Porter Ranch community; is that correct?

17 MR. JAMES: Vague and ambiguous.

18 THE WITNESS: If that's -- it's the gas in the
19 storage field, and so that's what I provided.

20 BY MR. PARRIS:

21 Q Well, really what you provided were just a
22 bunch of documents with a bunch of data on it; right?

23 A That's the gas composition that I provided.

24 Q Well, it was altered; wasn't it?

25 MR. JAMES: Misstates her testimony.

1 THE WITNESS: As I stated, it was -- it wasn't --
2 it was edited.

3 BY MR. PARRIS:

4 Q Do you think edited means something different
5 than altered?

6 A I think there's a basis of how they edit it.
7 I don't -- you know, I'm not here to mince words with
8 you. Alter, edit. To me, I say edited.

9 Q No. You are here to tell me what the gas
10 composition was. If the documents with that
11 information was recorded but then edited, then you are
12 not able to tell me; are you?

13 A Well, no. The gas composition that was there
14 is what was in there, and that's what we have available
15 for you.

16 Q You don't have any doubt somebody edited that
17 information; do you?

18 A No. What I -- that's not what I said. I
19 mean, where it is marked where it was edited, it was
20 edited.

21 Q And you have no way to account for why that
22 was done; is that true?

23 MR. JAMES: Misstates her testimony.

24 THE WITNESS: No, not at the time right now. I
25 didn't look into -- you know, I only provide -- I

1 downloaded and I provided as edited. If it was edited,

2 I didn't look into it at the time or before this.

3 BY MR. PARRIS:

4 Q Are you the person most knowledgeable at the
5 company that can tell us about the contents of the gas
6 stored in Aliso Canyon the week before the incident?

7 MR. JAMES: Misstates the topic of the PMQ notice.

8 MR. PARRIS: Okay. Well, let me read it to you.

9 MR. JAMES: Okay. Thank you.

10 BY MR. PARRIS:

11 Q "The contents of the gas stored
12 at the facility the week before the
13 incident, including but not limited to,
14 the constituents and/or components of
15 the gas, quantities of each constituent,
16 and total quantities."

17 You are not that person; are you?

18 A I provided what we have in the company, and
19 that's the data that we provided.

20 Q Okay. So is it your testimony that you are
21 the person most knowledgeable in the company as to what
22 I just read to you?

23 A Right. I can provide you that data. It is
24 here.

25 Q Well, it sounds to me all that you are saying

1 is you had the IT department do a dump of information
2 and you brought it with you; is that true?

3 A No. I downloaded the data myself.

4 (Mr. Barrett enters the room.)

5 BY MR. PARRIS:

6 Q Yourself. And when you saw that it had been
7 edited, you made no inquiry to find out how it had been
8 edited; is that correct?

9 A Well, at the time, because of the
10 circumstances and when the request was made, I didn't
11 have time to look at it.

12 Q When did you find out you were supposed to do
13 this?

14 A It was like right before -- on the 26th. It
15 was --

16 Q Five days ago?

17 A What you guys wanted specifically -- because
18 there was a change in request. So when the request
19 came in, it came in in the evening to me on Thursday
20 night.

21 Q Four days ago?

22 A Right. And I haven't been -- I don't work
23 weekends.

24 Q Wow. What's that like?

25 A I had a -- I had vacation, so, no, I didn't

1 have a chance to look at it.

2 Q So you had a vacation and you don't work
3 weekends. When was the vacation?

4 A Yesterday.

5 Q Yesterday.

6 Okay. So you spent -- what? -- eight hours on
7 it?

8 A I was busy on --

9 Q You were busy?

10 A I was busy on Friday. I was -- I didn't have
11 access to any of this on Friday.

12 Q So on Friday you didn't have access to this
13 information?

14 A No. Even on -- you know, so whenever the
15 request was made on Thursday, I wasn't even -- I was
16 out in the field. I didn't have access to it until
17 that time, the evening.

18 Q So when did you actually do the work to pull
19 this information together?

20 A In the evening on the 26th.

21 Q So that would be -- what? -- Thursday evening?

22 A Thursday evening.

23 Q How much time did you spend doing it?

24 A Trying -- attempting to. It took me a while
25 to try to get to it. So I did have problems. I don't

1 want to go into details, but it took me a couple hours
2 to go and try to do it.

3 Q And why were you out in the field?

4 A I was doing --

5 MR. JAMES: Outside the scope.

6 THE WITNESS: I was doing my job. I was in the
7 field as --

8 BY MR. PARRIS:

9 Q What do you do in the field that's part of
10 your job?

11 A Huh? It was just a job I can't get into. It
12 was just testing. That's outside of the scope of this
13 job.

14 Q So back during the blowout period of time or
15 the five years before, you would go out in the field.
16 That was part of your job; right?

17 A If -- which field? I mean, my job is to do --
18 you know, where the request is, go out in the field and
19 do the testing, but you --

20 Q I thought you said you send technicians to do
21 the testing.

22 MR. JAMES: Misstates her testimony.

23 THE WITNESS: It depends on the job; right? So I
24 had a job on Thursday which required my presence.

25 ///

1 BY MR. PARRIS:

2 Q So can you give me an estimate of the amount
3 of time you spent trying to gather the information
4 necessary to be the person most knowledgeable about the
5 contents of the gas stored at the facility the week
6 before the incident, including but not limited to, the
7 constituents and/or components of the gas, quantities
8 of each constituent and total quantities?

9 A So this came in on Thursday; right?

10 Q Yeah.

11 A So I did it Thursday night. That's all I had.

12 Q How much time did you spend doing it?

13 A A few hours.

14 Q And what specifically did you do?

15 A I down- -- I had to log in. I had to download
16 the data.

17 Q How did you choose which data to download?

18 A I was -- how did I choose?

19 Q Yeah.

20 A I looked at what was available.

21 Q You looked at the gas chromatograph records;
22 right?

23 A Yes. I provided that data.

24 Q Anything else?

25 A I -- for the other analysis that we did, we

1 provided the sulfur analysis, I did have to look around
2 for that data. So that was days prior when I was in
3 the office.

4 Q Are you confident you found all of it?

5 A What I could find, what I had access to from
6 our electronic files and from asking around, you know,
7 where's -- you know, who has the data, that's what we
8 found.

9 Q And that was Thursday evening?

10 A No, that was -- that request came in earlier.
11 I don't recall. Like a week or two before that.

12 Q Is it fair to say that you did a perfunctory
13 attempt to gather this information, given the limited
14 amount of time you were given to do it?

15 MR. JAMES: Misstates her testimony.

16 THE WITNESS: I don't know what perfunctionary
17 means.

18 BY MR. PARRIS:

19 Q Perfunctory.

20 A Perfunctory.

21 Q Yeah. Do you know what that means?

22 A No.

23 Q You did not do a thorough job that you would
24 have done had you had sufficient time; is that right?

25 A No. I did try to find the data with the time

1 given to me.

2 Q If you had been given more time, do you think
3 we would have more data available to us?

4 A I --

5 MR. JAMES: For the record --

6 THE WITNESS: No. I tried --

7 MR. JAMES: -- the plaintiffs provided the specific
8 information that was requested on Thursday in a phone
9 conversation, so we relayed the specific information
10 requested on this data to the witness. It was
11 pulled --

12 MR. PARRIS: This is --

13 MR. JAMES: -- and sent the very next morning to
14 plaintiffs. So to say --

15 MS. BROWN: I can't --

16 MR. JAMES: -- it was perfunctory or in any way
17 untimely is an unfair characterization.

18 MR. PARRIS: So it is your position that if she was
19 given insufficient time, it is not perfunctory?

20 MR. JAMES: This is --

21 MR. PARRIS: I don't care why.

22 MR. JAMES: We gave exactly the data that was
23 requested.

24 MR. PARRIS: I'm just trying to find out if all --

25 MR. JAMES: We provided sufficient notice of the --

1 that the database was there and available. We received
2 the request for a phone call. We received the request
3 of the specific information, and we got the information
4 to y'all within 24 hours. And I think the rest of the
5 counsel that were on the call would agree with that
6 timeline.

7 MS. OLIVER: I was on the call --

8 MS. BROWN: I'm not disagreeing with that.

9 MS. OLIVER: I was on the call. I disagree with
10 any suggestion that anyone on that call conceded that
11 this deposition was limited to documents that were
12 produced on the next day or that her scope of her
13 testimony would be limited to her printing a document.
14 That was not what was agreed upon.

15 In fact, on that call, we had several
16 questions about the scope and tried to make sure you
17 understood we were not limiting the testimony to that
18 sample document.

19 Now, yes, did you give us a sample? Yes, did
20 you give it the next day? Yes, I agree with that. So
21 when Jessica says she agrees with that, I agree with
22 that.

23 But the notion that the scope was limited or
24 her obligations was limited, I don't think anyone wrote
25 off their rights under the Code of Civil Procedure

1 about the obligations of a witness who is designated by
2 a corporate -- corporation.

3 MS. BROWN: I actually think Mark sent --

4 MR. JAMES: I am not sure. I don't think I said
5 anything about --

6 MS. BROWN: I think Mark sent a follow-up email
7 confirming that it was a bit broader, but the timeline
8 of the document --

9 MR. JAMES: I didn't say anything about the scope.
10 I was just talking about perfunctory searches in the
11 production of documents --

12 MS. BROWN: I don't think we are disagreeing with
13 your timeline of the document production.

14 MR. PARRIS: Nobody is going to get punished.

15 MR. JAMES: Okay. I just --

16 MR. PARRIS: All right. This isn't about being
17 bad. It is about the quality of the information that
18 we have and whether or not there is a possibility that
19 a more qualitative search could be done.

20 MR. JAMES: All right.

21 BY MR. PARRIS:

22 Q What I'm asking you is, if you had more time,
23 is it likely to believe that there is additional data
24 that would be responsive to the request? Or is it your
25 testimony this is all Southern California Gas Company

1 knows about what was in that hole when it blew out over
2 the neighborhood?

3 MR. JAMES: Vague and ambiguous.

4 THE WITNESS: Okay. I -- for that data, I did
5 download it. That's what we have in the measurement
6 collection system. For the other data I provided, I
7 did provide a few weeks ago, and I did go through our
8 electronic files searching for it. And I had to talk
9 to people to see, you know, where is it at, where do
10 you save your sulfur data at. So I did find those. So
11 I did look for the data that was asked for.

12 MR. PARRIS: Okay.

13 THE WITNESS: And this was the -- you know, this
14 was the best data available for that -- what you
15 wanted. You wanted daily averages. We don't do
16 daily -- you know, this is how we give you daily
17 averages, hourly averages.

18 BY MR. PARRIS:

19 Q Who said -- who said we wanted daily averages?

20 A I was told.

21 Q Okay. Thank you.

22 That was your belief, that we were looking for
23 daily averages?

24 A I was told exactly for daily average and
25 hourly average.

1 Q So that's what you looked for; right?

2 A That's what I looked for, for the gas
3 composition as opposed to whatever else I have, we had
4 our -- you know, if we have it, we gave you our
5 spot-testing.

6 Q I thought you said you don't test for benzene.
7 The gas chromatograph doesn't test for benzene. You
8 said that; didn't you?

9 A The gas chromatographs, you know, that's set
10 up at Aliso Canyon.

11 Q Don't test for benzene?

12 A They don't test for benzene.

13 (The document referenced below was
14 marked Deposition Exhibit 8-11 for
15 identification and is appended hereto.)

16 BY MR. PARRIS:

17 Q Directing your attention to next in order.

18 Let's do one at a time. Let's do -- SCG01566711 is the
19 Bates stamp.

20 What is that?

21 A This is an analysis that came from -- directly
22 from the gas analyzer.

23 Q That's a gas chromatograph; right?

24 A Right. A gas chromatograph.

25 Q Do you know where it was at?

1 A It says it is analyzer 416A_D2 [sic].

2 Q What does that mean?

3 A So that would be -- 416A would be -- I would
4 have to guess because -- we don't have the meter number
5 here.

6 Q But in any event, this is the calibration
7 test; right?

8 A No. This is the -- an actual gas analysis.
9 It is stream 1 -- or steam 1. So stream 1 would be
10 analysis on the gas stream -- or on the gas sample, not
11 the calibration.

12 Q Okay. So it is not that you can't test for
13 the benzene, it is that you don't; right?

14 A Well, the analyzer can only test for the
15 compounds that you see there.

16 Q Where?

17 A On here (indicating) and then here where --

18 Q You mean the data printout?

19 A The data printout.

20 Q That's been edited; correct?

21 A No, not all of it.

22 Q Some of it?

23 A Just whatever was edited for some reason --

24 Q Right.

25 A -- slightly.

1 Q Right. Well, how would you know if it is
2 slightly edited if you know -- given it has been edited
3 and you don't know what -- or who edited it?

4 A Our gas composition doesn't vary very much.

5 Q Well, you don't know what it was in those
6 days; do you?

7 A Well, when we investigate, we will see.

8 Q Yeah.

9 Do you see where there's an asterisk next to
10 oxygen and benzene and it says "indicates user-defined
11 components."

12 A Right. And it doesn't exist.

13 Q It is not that you can't test for it, it is
14 that you don't; isn't that true?

15 A No. No. It is whatever is set up on the
16 analyzer. So here, we don't -- we don't have anything
17 that would test for oxygen. And we don't have -- we
18 have asterisked user -- I don't know why it says this.
19 It's just -- it doesn't exist. We don't -- at Aliso we
20 don't have a GC that's set up for benzene or for
21 oxygen.

22 Q And that's simply because you didn't set it up
23 to do it; right?

24 A Well, for this analyzer, for what its purpose
25 was for, we didn't see the need to set it up for oxygen

1 or benzene.

2 Q All right. So it is not that the machine
3 won't do it, it is simply that the company doesn't do
4 it; isn't that true?

5 MR. JAMES: Asked and answered.

6 THE WITNESS: No. It's -- it is what the machine
7 was set up -- it is what the gas chromatograph was set
8 up to do.

9 BY MR. PARRIS:

10 Q By the company?

11 A Well, by the analyzer.

12 Q What does that mean?

13 A I mean, we specified that, you know, we wanted
14 something for measurement purposes for volume, and this
15 is our standard analyzer, which tests for methane
16 through C6+ and carbon dioxide and nitrogen.

17 Q Okay. So who is the user when it says
18 "indicates user-defined components"?

19 A I don't know.

20 Q You don't think Southern California Gas
21 Company is the user?

22 A It's -- I don't know why it says that. I
23 don't know why there's an asterisk there.

24 Q So you do not know --

25 A It is not -- it is not a compound -- for those

1 analyzers out there, it does not test specifically for
2 oxygen or benzene.

3 Q Are you saying it is incapable of it?

4 A The way it's -- the way that -- the analyzer
5 there is incapable of doing it.

6 Q Is that a software issue, or it hasn't been
7 programmed to do it?

8 A No. It is not a -- no.

9 Q I'm waiting.

10 A I said no, no software, no programming.

11 Q So why can't it do it if it says here that it
12 indicates user-defined components for oxygen and
13 benzene?

14 A It is a physical difference in the analyzer.
15 We would have -- the analyzer -- the Daniel's analyzer
16 would have to be purchased, and if we indicate one
17 or -- you know, the oxygen or benzene, you would have
18 to purchase it for that.

19 Q Do you know why the company didn't purchase it
20 for that?

21 A It is standard that our analyzers that we use
22 and that's approved that our analyzers will test for,
23 you know, methane to C6+ and --

24 Q As the principal engineer --

25 A -- for nitrogen and carbon dioxide.

1 Q As the principal engineer for the Southern
2 California Gas Company's chemical and environmental
3 department, can you tell the jury why the company does
4 not test for benzene?

5 A We don't. I mean, that's -- for this
6 analyzer?

7 Q For this specific analyzer?

8 A For this specific analyzer. So this --

9 Q Are there any analyzers that test for it?

10 A So this analyzer was set up, you know, through
11 measurement department, they wanted to measure it. So
12 what's approved that we approved of and what's approved
13 that we tell the CPC what's approved, we tell them this
14 is the Daniel's, this is what model we pick, this is
15 what we analyze for. So we --

16 Q Well, if you sent this to the CPUC, it would
17 indicate that you do test for it; correct?

18 A No. It just means we don't test for it. It
19 is not -- it is not set up to test for it.

20 Q Where does it say that?

21 A It doesn't. But it is just -- I don't
22 understand why -- I don't know why it is included here,
23 but we don't -- it is not there. It is not on the
24 analyzer.

25 Q What do you mean it is not on the analyzer?

1 A It doesn't test for oxygen. It does not test
2 for benzene specifically.

3 Q How do you know that?

4 A Because I know that.

5 Q Well, one of the reasons you might know it is,
6 it is your responsibility to decide what analyzers to
7 buy; isn't that right?

8 A Correct.

9 Q They look to you?

10 A We approve -- we approve -- no. We approve
11 the model number, we approve the analyzers. Then
12 someone else purchases it.

13 Q Right. But it is based upon what your
14 specifications are; right?

15 A Correct. It is what's approved by us and what
16 we tell the CPUC, this is how we test for heating
17 value, that we use an analyzer.

18 Q How do you know that you told the -- what, the
19 CPUC?

20 A Uh-huh.

21 Q California Public Utilities Commission?

22 A Yes.

23 Q They are a well-thought-of group.

24 Why would it -- is this a document you gave to
25 them?

1 A No.

2 Q What document would you have given them saying
3 what you test for?

4 A We normally give them documents like this.

5 Q Which is a printout of the data?

6 A That's in our measurement-collection system.

7 This is --

8 Q Okay. So you have never reported to the CPUC
9 exactly what you test for?

10 A We --

11 MR. JAMES: Misstates her testimony.

12 THE WITNESS: No. We test -- well, what we have is
13 in our measurement collection, so we provide them what
14 we test for --

15 BY MR. PARRIS:

16 Q Okay.

17 A -- in documents similar to what this is.

18 Q All right. Let's cut to the chase. Is there
19 any explanation you can offer to the jury why oxygen
20 and benzene is listed as two of the constituent parts
21 of natural gas that you test for but you don't actually
22 test for?

23 MR. JAMES: Misstates testimony. Misstates the
24 document.

25 MR. PARRIS: How is that misstating what the case

1 is -- what the facts are?

2 THE WITNESS: It is not there. I can't explain it
3 to you. It's part of the program from the analyzers.
4 I don't know why they would check -- you know, they
5 would provide this. Why -- I don't even know how it
6 happens, like, why would they check off oxygen and
7 benzene when it is not something that we had asked for
8 on the analyzer? And, you know, I don't know why this
9 report came out this way. It is not tested for.

10 BY MR. PARRIS:

11 Q Well, don't you need to know what the oxygen
12 content is because it is coercive?

13 MS. OLIVER: Corrosive?

14 THE WITNESS: Corrosive.

15 MS. OLIVER: Corrosive.

16 MR. PARRIS: Corrosive.

17 THE WITNESS: Yeah. So if we need to know what the
18 oxygen level is and if we are concerned that is above
19 the limit, then we will have a separate oxygen analyzer
20 for it.

21 BY MR. PARRIS:

22 Q Do you have a separate benzene analyzer?

23 A We don't have a separate benzene analyzer for
24 Aliso --

25 Q Thank you.

1 A -- at any of the gas chromatographs.

2 Q And that's because you didn't ask for it;
3 isn't that right? If you, as the principal engineer,
4 had said we need to test for benzene, you would be
5 testing for it; wouldn't you?

6 A I would recommend -- I could only recommend,
7 yes.

8 Q Is there any godly reason why you would not
9 recommend testing for benzene at Aliso Canyon?

10 A It would be up to our -- it would be outside
11 my realm. It would be up to the safety person to say,
12 hey, this is a concern. And then we -- and if it is a
13 concern and if we couldn't go below that, but if we did
14 go -- you know, whatever the concern was, if it was a
15 concern, then we would have followed through, but --

16 Q Is it a concern of yours?

17 A It would have been the concern of Safety. It
18 is up to them to decide what --

19 Q No. That's not what you said to me. What you
20 said to me was it is up to you to make the
21 recommendation for the gas chromatographs that you
22 actually use. Isn't that true?

23 MR. JAMES: Misstates her testimony.

24 THE WITNESS: We -- no. We recommend four
25 locations. We will recommend, do you need a gas

1 chromatograph? I would say yes. Then we would leave
2 it up to who was ever -- whatever field is installing
3 it, they will select from an approved list of
4 analyzers.

5 BY MR. PARRIS:

6 Q So what parameters do you look at in deciding
7 whether or not a facility should be testing for
8 benzene?

9 A It -- I'm not too sure what location you are
10 specifically asking about.

11 Q I'm asking about Aliso Canyon.

12 A For Aliso? For Aliso Canyon, the storage
13 facility, we would -- you know, if we -- knowing that
14 it is a gas that's from out of state, that it doesn't
15 contain much benzene, very little, we would not put --
16 I would not recommend a benzene analyzer at this
17 location.

18 Q Okay. So tell me how you know it contains
19 very little benzene.

20 A Because in the past, historically if we did
21 test for it, it is just not there. We just know how --
22 out-of-state gas is considered to be -- they would --
23 to meet their spec, to do what they -- to operate, they
24 don't -- they send us natural gas. They send us mostly
25 gas. They wouldn't send us, you know, gas that would

1 be high in C6+ where the benzene would be.

2 So knowing that it is low and knowing when we
3 test off and on, there's no -- you know, if there is
4 benzene, it is very little.

5 Q Has this always been true?

6 A In my lifetime at the gas company?

7 Q Yeah.

8 A For -- in terms of benzene?

9 Q Yes.

10 A I would -- I would say, from my opinion, yes.

11 Q Wasn't your website reporting after the
12 blowout high levels of benzene in the neighborhood?

13 A No. I'm not aware of that.

14 MR. JAMES: Outside the scope.

15 MR. PARRIS: Okay.

16 BY MR. PARRIS:

17 Q What is a safe -- what about -- let's go back
18 to hydrogen sulfide. Do you have an opinion as to what
19 is a safe level of hydrogen sulfide --

20 MR. JAMES: Outside the scope.

21 BY MR. PARRIS:

22 Q -- in the gas?

23 MR. JAMES: Outside the scope. Calls for
24 speculation. Calls for expert testimony.

25 THE WITNESS: I don't. I just know that the 4 ppm

1 limit is considered to be low. And it is safe and it
2 is low in terms of -- it is safe.

3 BY MR. PARRIS:

4 Q What's that level?

5 A 4 ppm.

6 Q 4 parts per million --

7 A Yes.

8 Q -- of hydrogen sulfide?

9 A Correct. So that's our limit. That's the
10 limit that the CPUC gave us.

11 Q Are you aware --

12 A I consider that safe.

13 Q -- that the Environmental Protection Agency
14 says that .00014 parts per million is dangerous for
15 people with sensitivities?

16 A No.

17 Q Thank you.

18 Why do you think out-of-state natural gas is
19 low for benzene?

20 MR. JAMES: Outside the scope. Calls for
21 speculation.

22 MR. PARRIS: How could it possibly be outside of
23 the scope? You said she is the person most
24 knowledgeable about the composition of the gas for five
25 years prior to the blowout.

1 MR. JAMES: Go ahead.

2 THE WITNESS: Okay. So I would -- again, based on

3 my opinion, my experience, again, the gas from out of

4 state has a lower BTU, it has a lower dew point.

5 There's less C6+ in there. And when we tested it, it

6 has been very low levels. It is trace if it is in

7 there, 1 ppm, 2 ppm. Like I said --

8 BY MR. PARRIS:

9 Q When you say trace --

10 A -- it's not present in out-of-state.

11 Q When you say trace, someplace below 1 --

12 A 1. 1 or 2.

13 Q -- parts per million?

14 A Yeah, 1 or 2, you know, single digit parts per

15 million, yes.

16 Q If you had been told that the Aliso Canyon

17 area had old wells that had been abandoned and not

18 capped seeping the contents of the field into the

19 neighborhood, would your concern about testing for

20 benzene have been different?

21 MR. JAMES: Assumes facts not in evidence. Outside

22 the scope. Calls for speculation. Incomplete

23 hypothetical.

24 THE WITNESS: I don't know, you know, what you are

25 trying to say. I just know that it was gas from our

1 storage. So it would have been free -- it would have
2 been trace benzene.

3 BY MR. PARRIS:

4 Q So was your assumption always that the gas you
5 put into that storage field stayed there until it was
6 extracted?

7 A That's -- that's not my knowledge. It is --
8 whatever happens in storage, I can't testify. That's
9 not my function.

10 Q Okay. But you are the person that decides
11 what to test for.

12 A I understand, but it is not my function what
13 happens in storage. If it is gas from storage, I would
14 say it is storage gas. It would be the same as what's
15 injected. What's injected is what is withdrawn.

16 Q Didn't you recommend that there be monthly
17 testing for benzene?

18 A Specifically where?

19 Q You.

20 A You. Me.

21 Q Didn't you author a recommended method of
22 testing the gas in the storage facility that said you
23 should do it monthly?

24 A No. The way it is stated is that if you
25 suspect there's benzene, then you test for benzene. It

1 is --

2 Q So you are familiar with the document?

3 A You are holding it up.

4 Q You are familiar with it; right?

5 A No. Not --

6 Q You didn't --

7 A Which --

8 Q You didn't author the recommended method
9 188.002 for gas quality monitoring?

10 A Yes, I did.

11 Q Okay. You are the author of that. And in
12 that document you specifically addressed how often you
13 should be testing for benzene; isn't that right?

14 MR. JAMES: Misstates her testimony. Misstates the
15 document.

16 THE WITNESS: So on the document --

17 BY MR. PARRIS:

18 Q In the document.

19 A In the document. If you could read the parts
20 of the document other than what -- where you are
21 reading -- you have to show me where you are reading.
22 It is a table -- right? -- that you are looking at?

23 Q Yeah.

24 A Okay. So on that table, it is what the
25 frequency you should test for, but on other sections

1 where we set the test, if you suspect, then you test on
2 a monthly basis.

3 Q Actually -- doesn't it actually say "major
4 suppliers"?

5 A Hmm?

6 Q Didn't you actually say "major suppliers" and
7 "suspect suppliers"?

8 A Right. If you suspect.

9 Q So where it says major suppliers and suspect
10 suppliers, you don't think those are two separate
11 categories?

12 A It is how -- well, okay. I need to look at
13 the document.

14 Q And didn't you define suspect suppliers as
15 greater than 100 parts per million based on past
16 analysis?

17 MR. JAMES: The witness has said she needs to see
18 the document.

19 THE WITNESS: I need to look at the document.

20 BY MR. PARRIS:

21 Q So you have no recollection of the document
22 you authored? See, I don't have to show you, by the
23 rules of evidence --

24 A Then I can't answer your question.

25 Q -- a document I'm cross-examining you on.

1 A I can't answer your question unless you show
2 me the document.

3 Q Okay. So you -- as the principal engineer and
4 the author of the document and the author of the method
5 your company is required to use in their own internal
6 memorandum, you don't know. Is that your testimony?

7 A No. I would like to see the document first.

8 Q I know you would like to see it, and I will
9 eventually show it to you. But right now I'm following
10 the rules, and I get to ask you these questions. And
11 if, in fact, you have no recollection or memory or
12 knowledge about the procedures your company uses that
13 you authored, tell the jury that.

14 A No. I need to see the document. I don't
15 memorize it verbatim, and you are, like, looking at
16 certain parts of it. You are not reading the whole
17 thing.

18 Q So is it your testimony that you have never
19 recommended that you test all major suppliers for
20 benzene on a monthly basis?

21 A If the supply is suspect, then we would be
22 testing it on a monthly basis.

23 Q Okay. So is that your answer?

24 A From my best recollection.

25 Q Okay.

1 A Since you are not sharing the document.

2 Q You see, the thing about -- I don't want you
3 to think I'm being unfair, but I'm engaged in
4 cross-examination. What I'm trying to do is get to the
5 truth.

6 And what you have said so far is that you
7 don't test for benzene, and what I'm asking you is
8 isn't it true that you are supposed to test for it
9 every month on a major supplier?

10 A That's not what I said.

11 Q Is that true or not true?

12 A I'm saying that if we test monthly, it would
13 be where we suspect there's benzene.

14 Q Was there ever a time during your tenure as
15 the principal engineer of the chemical and
16 environmental department where it was your policy that
17 the company test every month every major supplier?

18 A So initially we would have asked for any new
19 supply to test to see if there is benzene initially,
20 and then afterwards, if there are -- if we did suspect
21 it, we would continue to test it once a month.

22 Q Why don't you test every month, regardless?

23 A We test every month for other -- we test
24 what's needed to be tested.

25 Q Needed by whom?

1 A Needed by the company.

2 Q Okay. Well, let's get to that. Is what you
3 test for based upon what the CPUC says you have to test
4 for, or is there an independent analysis done by the
5 company as to what is in the best interest of the
6 public?

7 MR. JAMES: Calls for speculation. Outside the
8 scope.

9 THE WITNESS: So -- so we are -- we do have limits
10 set up that's approved by the CPC. The frequency of
11 testing is also -- we are also told by the PUC, like,
12 how -- what should be tested, you know. Here is --
13 they approve it, basically. They approve this.

14 They have also recommended gas chromatographs.
15 They have asked us to put a gas chromatograph at all
16 our local producers. So we are told by the CPUC, you
17 know, what to test for in terms of --

18 BY MR. PARRIS:

19 Q And is that what you limit your testing to?

20 A Hmm?

21 Q Is that what you limit your testing to?

22 A Well, we -- we interpret what's needed to make
23 sure that the supplier -- you are looking at something
24 that only applies to interstate gas or interstate
25 supplies. So if --

1 Q Why the difference?

2 A Why the difference? I'm just telling you --

3 Q Between inter- and --

4 A -- this is -- this -- we -- this is for our
5 producers. What you are looking at is outside the
6 scope of storage fields. What you are looking at is a
7 document about producers and how often we should be
8 monitoring and testing what we should be testing for.

9 Q Do you want to change that?

10 A That's why I need to look at the document to
11 see what it says.

12 Q And I'll get you there, but I want to find out
13 what --

14 A I don't -- I'm not going to continue. I'm
15 sorry.

16 Q Okay. You are refusing to answer my questions
17 about the document?

18 A If you are not going to show me a document
19 that you're questioning on, then I'm not going to
20 continue.

21 MR. PARRIS: Okay. Are you concurring with that?

22 MR. JAMES: Yeah.

23 MR. PARRIS: Okay. Thank you.

24 You are familiar with Evidence Code 768;

25 aren't you? Is there a reason why your witness is not

1 complying with Evidence Code 768?

2 MR. JAMES: It is not a memory test on her part.

3 She feels like you are trying to trick her by

4 showing -- asking her questions of out-of-context parts

5 of a document. She said she would feel more

6 comfortable answering about a document by seeing the

7 document. If you have a reason why you refuse to show

8 it to her, then that's on you, not on her.

9 MR. PARRIS: I see where she gets it.

10 So are you telling me that your witness is

11 refusing to comply with Evidence Code 768 so I can tell

12 the judge?

13 MR. JAMES: I don't know that there's a question in

14 front of her to answer, so.

15 MR. PARRIS: So is your answer yes or no?

16 MR. JAMES: I don't think that there's a question

17 in front of her to answer, so.

18 BY MR. PARRIS:

19 Q Is there a difference between gas

20 chromatograph photoionization detectors and other types

21 of gas chromatographs?

22 A So there's gas chromatographs that use certain

23 detectors. So if one uses a photoionization detector

24 then as opposed to another one that uses, say, a sulfur

25 detector; right? So it is gas chromatograph with

1 whatever it's supposed to -- you know, what you use as
2 a detector. So the difference is the detector, yes.

3 Q Is there a reason why you use a
4 photoionization detector for benzene as opposed to
5 other substances?

6 A At the time where that document -- I can't see
7 which document you are reading -- that was --

8 Q You said --

9 A That's what we were using at the time if we
10 had to test a spot sample for benzene.

11 Q Okay. So there are gas chromatographs in the
12 company you use for spot-testing of benzene; is that
13 right?

14 A That analyzer that we called out would have
15 been an analyzer that was used by an outside lab.

16 Q Outside lab?

17 A At the time. I don't -- I really can't
18 continue --

19 Q I'm going --

20 A You have to let me know. I don't know what
21 date you are looking at and how --

22 Q Okay.

23 A -- I should answer those questions based on --

24 Q You should answer truthfully.

25 A I am trying to. I --

1 Q I will give you the document before I'm done,
2 but what I don't want you to do is be able to
3 manufacture an answer before I've asked you the
4 questions I need to ask you. Okay? You see the reason
5 for that?

6 A I need to know what context and what date your
7 document is.

8 Q Do you remember authorizing recommended method
9 188.002?

10 A What date? What document? You should show me
11 the document.

12 Q Do you remember authoring recommended method
13 188.002 at any time?

14 A Yes.

15 Q When did you do that?

16 A I -- we revise it every five years.

17 Q Okay.

18 A So I don't know which date you have.

19 Q Okay. I have the current publication date of
20 February 23rd, 1996. Twenty years ago.

21 A Okay.

22 Q So the question I have to you is back in 1996
23 you authored this. Did you ever revise it where you
24 removed the requirement of testing for benzene?

25 A No.

1 Q So the requirements for testing for benzene
2 have remained consistent from 1996, to your knowledge;
3 is that correct?

4 A No. What would happen is we would -- benzene
5 has always been a part of our testing and monitoring,
6 but I would have revised -- you know, I would update
7 it, what analyzers could be used, I would update it, or
8 maybe our definitions of what suspect means or what
9 location should be tested.

10 Q Okay. So when you decide which locations
11 should be tested, what do you consider?

12 A I don't know what tests -- we test for benzene
13 at locations where we suspect benzene, and initially
14 when we do startup of a new producer, we will test that
15 producer for benzene.

16 Q Okay. Isn't benzene always present in natural
17 gas?

18 A No.

19 Q Okay. That's your belief?

20 A That's my belief and that's what I've seen.

21 Q Thank you.

22 MR. JAMES: All right. It is 6:00 P.M. I think we
23 are --

24 MR. KIESEL: Before we go off the record, I would
25 like -- what we want to do is if you are going to show

1 the witness that document --

2 MR. JAMES: Oh, yeah.

3 MR. KIESEL: -- you have got it marked as an
4 exhibit, so it is a part of the record and not just an
5 amorphous reference.

6 MR. PARRIS: Agree.

7 MR. JAMES: I'll allow that.

8 MR. KIESEL: So let's mark this as 8-12.

9 (The document referenced above was
10 marked Deposition Exhibit 8-12 for
11 identification and is appended hereto.)

12 MR. PARRIS: You can go ahead and look at -- did
13 you mark it?

14 THE REPORTER: Yes.

15 THE WITNESS: Oh, that's the wrong one.

16 MR. KIESEL: Since we are not going to get done
17 today, at least just lay the foundation for the
18 document, Rex, and then we can call it.

19 MR. PARRIS: All right. I would like to finish the
20 document so we can move on. Okay?

21 MR. JAMES: What kind of timing are we talking
22 about to finish it?

23 MR. PARRIS: Five minutes. Well, it depends on how
24 much she fights with me, but five minutes.

25 MR. JAMES: Do you want to take a break?

1 THE WITNESS: Yes.

2 MR. JAMES: She needs a break, and then I'll give
3 you five minutes when we come back.

4 MR. PARRIS: You are going to take a break so we
5 can come back and do five minutes?

6 MR. JAMES: Yes. That's what we are going to do.

7 VIDEO OPERATOR BROWN: Time is 6:03. We are going
8 off the record.

9 (Recess taken.)

10 VIDEO OPERATOR BROWN: The time is now 6:05. Back
11 on the record.

12 MR. JAMES: So the witness is exhausted. It is
13 6:00 P.M., which we have discussed separately as being
14 the cutoff for the day. So --

15 MR. PARRIS: Who did you discuss separately with?

16 MR. JAMES: It has been discussed amongst counsel
17 previously as the cutoff.

18 MR. PARRIS: Is that accurate?

19 MR. JAMES: It was earlier agreed, cutoff for the
20 day.

21 MS. BROWN: I think it is in the CMO.

22 MR. JAMES: Yes.

23 MR. PARRIS: Okay.

24 MR. JAMES: And so we are done for the day. We
25 have a separate call tomorrow to discuss scheduling.

1 We will talk. Given the understanding that you are not
2 done and that there are other questions, we will talk
3 about scheduling. She is not available tomorrow,
4 anyway. So --

5 MR. PARRIS: How do you know? You didn't ask her.

6 MR. JAMES: -- we will bring her back at a mutually
7 convenient date when she --

8 MR. PARRIS: How do you know she is not available?
9 You didn't ask her.

10 MR. JAMES: We talked about it earlier in the
11 afternoon when it made -- much to our surprise, it
12 became apparent that we weren't going to finish today.
13 So we will -- we will find a date and we will come up
14 with a mutually convenient date in the near future.

15 MR. KIESEL: So let me suggest as an option, we
16 have another PMQ deposition Thursday, another, I think,
17 subset of this category, because it says part 2 at
18 one o'clock. Is that right? When the deposition --

19 MS. BROWN: No. Thursday morning is relocation
20 and/or health. I sorry, I don't remember which one is
21 first.

22 MS. OLIVER: Thursday morning is relocation.

23 MR. JAMES: Okay. We had a dizzying couple of
24 emails yesterday about that.

25 MR. PARRIS: Well, wait a minute. I want to be

1 clear on the record. You are refusing to allow her to
2 come in and identify that document for the record that
3 I've been asking her about. Is that correct?

4 MR. JAMES: I am saying that she is exhausted. You
5 said you wanted to have additional questions about the
6 document.

7 MR. PARRIS: Did she identify it yet? I can't
8 remember.

9 MR. JAMES: And so instead --

10 MR. PARRIS: I am asking --

11 MR. JAMES: -- of additional --

12 MR. PARRIS: -- you to allow her to identify the
13 document that I've been questioning her about before
14 she leaves. That is not an onerous request, and it is
15 total gamesmanship that you won't allow her to do that.

16 MR. JAMES: You said you wanted to ask her a whole
17 series of questions about the document.

18 MR. PARRIS: What about what I just said could you
19 not understand?

20 MR. JAMES: She is done.

21 MR. PARRIS: Look at my lips when I speak. I want
22 her to come back in here and identify that document
23 that we have marked as an exhibit. Are you telling me
24 she is too exhausted to do that?

25 MR. JAMES: I am telling you she is done for the

1 day, yes.

2 MR. PARRIS: What you are telling me is that you
3 are creating an obstacle to the admission of that
4 document at the time of trial for no other purpose than
5 gamesmanship.

6 MR. JAMES: I am telling you no such thing --

7 MR. PARRIS: You guys really do this on a regular
8 basis.

9 MR. JAMES: -- whatsoever.

10 MR. PARRIS: Then tell me -- tell the court a
11 reasonable explanation as to why the witness, after she
12 has been shown a document that's been marked, you
13 immediately call a break and refuse to allow her to
14 identify it. Is there any rational explanation for
15 that?

16 MR. JAMES: We did not -- you marked the document
17 prior to her -- we called the break. This was marked
18 either as she was getting up or after we got up. So
19 I'm not --

20 MR. PARRIS: How could that possibly be true?

21 MR. JAMES: It has nothing to do with gamesmanship.
22 This is just about -- you said you had questions to ask
23 her, another series of questions. She got out. She
24 said, "I'm exhausted. I'm not prepared to answer any
25 more questions." We are after 6:00 P.M. She is done

1 for the day. She will come back at a mutually
2 agreeable time.

3 MR. PARRIS: Paul --

4 MR. JAMES: End of story.

5 MR. PARRIS: -- if you are not going to start
6 bringing motions against these people, our office will.

7 MR. KIESEL: So --

8 MR. PARRIS: We also want to bring a motion to get
9 out of this whole deal you guys agreed to, and let's do
10 it according to code. Let's bring them up to Lancaster
11 when I'm deposing them, but to drag me down and allow
12 him to do a gamesmanship thing -- a move like that is
13 reprehensible.

14 MR. KIESEL: So what I'm going to suggest you
15 consider doing is on Thursday -- because I don't want
16 to string this deposition out too long -- on Thursday
17 bringing her back and continuing with this witness.

18 MR. PARRIS: I can't do it.

19 MR. KIESEL: You can certainly do multiple tracks.
20 You can't do it Thursday?

21 MR. PARRIS: Maybe I can. What I can do, I can
22 just fly out of --

23 MR. KIESEL: Talk to the witness and see if she can
24 come back Thursday, and we can multi-track the
25 depositions. We already have one on schedule. We can

1 have another conference room going at the same time and
2 get this done.

3 I agree with you, Rex, that we need to move
4 this along and get things completed. So --

5 MR. PARRIS: I want some assurance that's going to
6 happen. Otherwise, let's go before Wiley. Why are we
7 dealing with this?

8 MR. KIESEL: So why don't you talk to the witness.

9 MR. JAMES: How much more -- what kind of length of
10 time do we have left for this deposition?

11 MR. PARRIS: She's the witness that's most
12 knowledgeable about the crap our clients were
13 breathing. For heaven's sake, why would you think this
14 is a short depo?

15 MR. JAMES: She is not the air-monitoring,
16 air-sampling witness. So let's --

17 MR. PARRIS: Look at what you designated her as.

18 MR. JAMES: I would ask y'all to have a
19 conversation about the PMQ process with Mr. Parris
20 so --

21 MR. PARRIS: That's because I don't understand
22 litigation, I guess.

23 MR. JAMES: -- we can actually have a PMQ
24 deposition. I appreciate Catherine's section of today.
25 If we could have more of that, this would be a lot more

1 productive of an experience.

2 MR. KIESEL: I'll give you an answer how much more
3 time we have.

4 MR. JAMES: Okay. So --

5 MR. PARRIS: I don't have much trial experience
6 like you guys do.

7 MR. KIESEL: We will discuss --

8 MR. PARRIS: It says right here, the contents of
9 the gas stored in the facility during the five-year
10 period prior to the incident. And you think that's a
11 short deposition?

12 MR. KIESEL: If you --

13 MR. JAMES: I think Catherine did a wonderful job
14 of soliciting that testimony. We should have come and
15 gone through that testimony --

16 MS. OLIVER: You're --

17 MR. JAMES: -- and be done with it, and we could
18 have all gone on our merry way.

19 MR. PARRIS: Maybe you can teach me how to try a
20 case. Okay? Because right now I don't see that.

21 MR. JAMES: Actually, I don't think you were here
22 for most of it, so maybe you can review the transcript
23 later on.

24 MR. KIESEL: All right. So --

25 MR. JAMES: If we can get a sense of the timing of

1 this --

2 MR. PARRIS: It was at your request.

3 MR. JAMES: -- of what we have left for this
4 deposition.

5 MS. BROWN: I think you can trust Paul to get you a
6 sense of timing of what's left.

7 MR. PARRIS: No, Paul, they can't.

8 MR. KIESEL: So --

9 MR. PARRIS: We will do this deposition until it is
10 done or they withdraw her as the person most
11 knowledgeable about the stuff our clients were
12 breathing.

13 MR. KIESEL: So you and I agree that we will do
14 this deposition until we are done. We will talk
15 collectively and figure out what that time is, speak
16 with the witness and see if she is available on
17 Thursday, and I'll get back to you shortly.

18 MS. OLIVER: And we have to have an agreement that
19 the objections and the long breaks do not continue
20 endlessly because "Out of scope" for "What are your
21 responsibilities" is insane.

22 MR. RUTGER PARRIS: Asked and answered is insane.

23 MS. OLIVER: That makes it impossible to predict
24 the time, Paul.

25 MR. RUTGER PARRIS: It's the most foolish objection

1 you can make.

2 MR. PARRIS: And you are criticizing me because I
3 allowed somebody to take the witness before the break
4 was completed? Seriously, Counsel.

5 MR. KIESEL: Is there a deposition on Friday?

6 MS. BROWN: There is one on Friday. Maybe you can
7 see if she's available either Thursday or I don't know
8 if you're handling either Thursday --

9 (Multiple parties speaking at once.)

10 MR. KIESEL: Time out for Pam's sake. Let's go off
11 the record and discuss scheduling. Off the record.

12 VIDEO OPERATOR BROWN: Time is now 6:12. Going off
13 the record.

14 (The deposition proceeding was adjourned at 6:12 P.M.)

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16 --ooOoo--

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CERTIFICATE
OF
CERTIFIED SHORTHAND REPORTER

The undersigned Certified Shorthand Reporter of the State of California does hereby certify:

That the foregoing proceeding was taken before me at the time and place therein set forth, at which time the witness was duly sworn by me;

That the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed, said transcript being a true and correct copy of my shorthand notes thereof;

That the dismantling of the original transcript will void the reporter's certificate.

In witness thereof, I have subscribed my name this date:_____.

PAMELA COTTEN, CSR, RDR
Certificate No. 4497
Certified Realtime Reporter

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original transcript with errata sheet per the instructions given to you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

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DECLARATION UNDER PENALTY OF PERJURY

I hereby declare under penalty of perjury that the foregoing is my deposition under oath; are the questions asked of me and my answers thereto; that I have read same and have made the necessary corrections, additions, or changes to my answers that I deem necessary.

In witness thereof, I hereby subscribe my name this _____day of _____, _____.

MAY LEW, VOLUME I

EXHIBIT E

Video of
May Lew Deposition
(May 1, 2018)

[Copies of disk to be delivered separately
to dept. SS9 and mailed to Defense
Counsel]

EXHIBIT F

Dillon Sandidge

From: Rex Parris
Sent: Wednesday, May 02, 2018 8:53 AM
To: Ashley Conlogue; collie.james@morganlewis.com
Cc: Schrader, David L.; 'mleslie@bsfllp.com'; 'Jessica.Brown@lacity.org'; 'Catherine.Wieman@doj.ca.gov'; asiegel@millerbarondess.com; jtokoro@millerbarondess.com; PRCA-Paul R. Kiesel; mtodzo@lexlawgroup.com; Patricia Oliver
Subject: Re: Porter Ranch : Continued Deposition

Dear Mr. James:

Ms. Lew is the person designated by the defendant as the PMK for the gas composition. She is also the author of many of the defendant's policy and procedures for testing the safety of the gas. Since the "gas" is the stuff that has caused the health consequences suffered by our clients, we need to take a thorough and unobstructed deposition of this witness.

To avoid any confusion, we want to clarify our intentions regarding the completion of Ms. Lew's deposition. We do not agree to any limitation of time. A stream of objections, rarely addressing privilege, or the form of the question, consumed a significant amount of time during the first session of her deposition. Also, there were long breaks that seemed to occur following difficult questions. These circumstances preclude our ability to estimate the length of time needed to complete her deposition.

God bless,

R Rex Parris

From: Ashley Conlogue <Conlogue@kiesel.law>
Date: Tuesday, May 1, 2018 at 7:19 PM
To: "collie.james@morganlewis.com" <collie.james@morganlewis.com>
Cc: "Schrader, David L." <david.schrader@morganlewis.com>, "'mleslie@bsfllp.com'" <mleslie@bsfllp.com>, "'Jessica.Brown@lacity.org'" <Jessica.Brown@lacity.org>, "'Catherine.Wieman@doj.ca.gov'" <Catherine.Wieman@doj.ca.gov>, Amnon Siegel <asiegel@millerbarondess.com>, "jtokoro@millerbarondess.com" <jtokoro@millerbarondess.com>, Paul Kiesel <Kiesel@Kiesel.law>, "mtodzo@lexlawgroup.com" <mtodzo@lexlawgroup.com>, Patricia Oliver <poliver@parrislawyers.com>, R Rex Parris <rrparris@parrislawyers.com>
Subject: Porter Ranch : Continued Deposition

Mr. James:

I am writing on behalf of Mr. Kiesel regarding today's deposition of Ms. Lew, who was offered as SoCalGas' PMQ re: Gas Composition. After consulting with counsel for the private plaintiffs, the public entities, and the developers, we request that Ms. Lew be brought back to Morgan Lewis to complete her deposition. We propose Thursday, May 3, 2018 beginning at 9:00 a.m. We anticipate needing a maximum of 4 additional hours.

A response confirming that date and time is appreciated.

Thank you.

Kiesel Law

Ashley Conlogue

Associate Attorney

8648 Wilshire Boulevard

Beverly Hills, CA 90211-2910

T: 310.854.4444

F: 310.854.0812

EXHIBIT G

Dillon Sandidge

From: James, IV, Collie F. <collie.james@morganlewis.com>
Sent: Wednesday, May 02, 2018 1:21 PM
To: Rex Parris; Ashley Conlogue
Cc: Schrader, David L.; 'mleslie@bsfllp.com'; 'Jessica.Brown@lacity.org'; 'Catherine.Wieman@doj.ca.gov'; asiegel@millerbarondess.com; jtokoro@millerbarondess.com; PRCA-Paul R. Kiesel; mtodzo@lexlawgroup.com; Patricia Oliver; Zwang-Weissman, Yardena R.; Miller, Deanne L.; Dragna, James J.
Subject: RE: Porter Ranch : Continued Deposition

Mr. Parris, et al.

As stated in a separate meet and confer call with Plaintiffs' counsel that ended earlier this morning, Defendants intend to bring a motion for protective order declaring that the PMQ Deposition for Topics 36 and 37 is concluded. Plaintiffs had more than sufficient time yesterday to seek testimony from the PMQ witness within the designated scope of the noticed topics during yesterday's session, but instead elected to spend the time on matters far outside the designated date range and subject matter scope of the PMQ topics, badgering the witness, and otherwise abusing the deposition process. The email below demonstrates that Plaintiffs intend to continue with this improper conduct. Neither Ms. Lew nor any other SoCalGas PMQ representative for Topics 36 and 37 will appear at 9:00 am on May 3, 2018, as proposed below.

Regards,

Collie

Collie F. James, IV

Morgan, Lewis & Bockius LLP

600 Anton Boulevard, Suite 1800 | Costa Mesa, CA 92626-7653

Direct: +1.949.399.7199 | Main: +1.714.830.0600 | Fax: +1.714.830.0700

collie.james@morganlewis.com | www.morganlewis.com

Assistant: Kathleen C. Rosello | +1.949.399.7187 | kathleen.rosello@morganlewis.com

From: Rex Parris <rrparris@parrislawyers.com>
Sent: Wednesday, May 2, 2018 8:53 AM
To: Ashley Conlogue <Conlogue@kiesel.law>; James, IV, Collie F. <collie.james@morganlewis.com>
Cc: Schrader, David L. <david.schrader@morganlewis.com>; 'mleslie@bsfllp.com' <mleslie@bsfllp.com>; 'Jessica.Brown@lacity.org' <Jessica.Brown@lacity.org>; 'Catherine.Wieman@doj.ca.gov' <Catherine.Wieman@doj.ca.gov>; asiegel@millerbarondess.com; jtokoro@millerbarondess.com; PRCA-Paul R. Kiesel <kiesel@kiesel.law>; mtodzo@lexlawgroup.com; Patricia Oliver <poliver@parrislawyers.com>
Subject: Re: Porter Ranch : Continued Deposition

[EXTERNAL EMAIL]

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God bless,

R Rex Parris

From: Ashley Conlogue <Conlogue@kiesel.law>

Date: Tuesday, May 1, 2018 at 7:19 PM

To: "collie.james@morganlewis.com" <collie.james@morganlewis.com>

Cc: "Schrader, David L." <david.schrader@morganlewis.com>, "mleslie@bsflp.com" <mleslie@bsflp.com>,

"Jessica.Brown@lacity.org" <Jessica.Brown@lacity.org>, "Catherine.Wieman@doj.ca.gov"

<Catherine.Wieman@doj.ca.gov>, Amnon Siegel <asiegel@millerbarondess.com>, "jtokoro@millerbarondess.com"

<jtokoro@millerbarondess.com>, Paul Kiesel <Kiesel@Kiesel.law>, "mtodzo@lexlawgroup.com"

<mtodzo@lexlawgroup.com>, Patricia Oliver <poliver@parrislawyers.com>, R Rex Parris <rrparris@parrislawyers.com>

Subject: Porter Ranch : Continued Deposition

Mr. James:

I am writing on behalf of Mr. Kiesel regarding today's deposition of Ms. Lew, who was offered as SoCalGas' PMQ re: Gas Composition. After consulting with counsel for the private plaintiffs, the public entities, and the developers, we request that Ms. Lew be brought back to Morgan Lewis to complete her deposition. We propose Thursday, May 3, 2018 beginning at 9:00 a.m. We anticipate needing a maximum of 4 additional hours.

A response confirming that date and time is appreciated.

Thank you.

Kiesel Law

Ashley Conlogue

Associate Attorney

8648 Wilshire Boulevard

Beverly Hills, CA 90211-2910

T: 310.854.4444

F: 310.854.0812

[We appreciate your referrals](#)

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EXHIBIT H

Morgan Lewis

Collie F. James, IV

Partner

+1.949.399.7199

collie.james@morganlewis.com

May 9, 2018

VIA E-MAIL

Paul Keisel
Keisel Law Group
8648 Wilshire Boulevard
Beverly Hills, CA 90211-2910

Re: *Southern California Gas Leak Cases* (JCCP No. 4861)
Meet and Confer regarding SoCalGas' Intent to File Motion for Protective Order on PMQ
Topics 36 & 37

Dear Paul:

We write to you as Liaison Counsel pursuant to Case Management Order No. 2 regarding the PMQ deposition for Topics 36 and 37 that occurred Tuesday, May 1, 2018, in which May Lew appeared as the designated witness for defendant SoCalGas. As stated previously in separate correspondence, due to the conduct of the deposition, SoCalGas intends to move for a protective order to officially terminate the deposition and other appropriate relief. This letter constitutes Defendant's Meet and Confer correspondence in accordance with C.C.P. § 2025.420 and Case Management Order No. 2. The protective order is necessary due to the questioning and conduct of R. Rex Parris and the PARRIS law firm on behalf of Private Individual Plaintiffs and as lead questioner during the deposition.

The noticed PMQ topics were very discrete: the composition of the natural gas at Aliso Canyon during two specific time periods, the five years preceding October 23, 2015, and the week before October 23, 2015. As the transcript makes clear, however, Mr. Parris spent the vast majority of the 7 ½ hour deposition questioning the witness about issues wildly outside the scope of the PMQ topics—both in terms of subject matter and the specified date range. Indeed, at the very outset of his questioning, Mr. Parris admitted to having never read or even seen the PMQ topics. Over the course of the deposition, Mr. Parris also made several statements illustrating he had no intention of keeping his questions within the scope of the PMQ topics.

In addition, Mr. Parris was abusive to the witness and needlessly hostile to counsel. After Ms. Lew testified that she was unable to answer his questions about contents of document without reviewing them, he mocked her inability to speak from memory to the contents of the documents. On multiple occasions, Mr. Parris attempted to prevent the witness from taking breaks even after she expressed she was thirsty or needed to relieve herself. Moreover, Mr. Parris complained that the witness was wasting time by reviewing documents and taking breaks despite the fact he failed to arrive for the deposition until almost thirty minutes after the 9:00 am start time and failed to

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Morgan, Lewis & Bockius LLP

return on time after the lunch break. Counsel for the Government Plaintiffs was required to step in and proceed after lunch just to keep the deposition moving, despite the fact that Mr. Parris and his team also took the deposition exhibits with them. Having failed to attend the deposition during questioning by the Government Plaintiffs, Mr. Parris had no basis even to know whether his questions after the Government Plaintiffs completed their approximately 90-minute examination were duplicative. As the deposition approached 6:00 p.m., Mr. Parris spent approximately 20 minutes attempting to examine Ms. Lew on a document he refused to show her, despite her repeatedly stating she could not answer without seeing the document. Only after numerous questions did Mr. Parris acknowledge that the document was dated 1996 – 22 years ago.

The 7½ hours of examination were more than sufficient for the PMQ deposition on the two discrete topics. In fact, the Government Plaintiffs completed any reasonable examination on those topics in their 90-minute examination.

Any of Mr. Parris' actions alone warrants relief. Together, they mandate it. Accordingly, SoCalGas will seek a protective order, by regularly-noticed motion, requesting the following specific relief:

1. The deposition regarding PMQ topics 36 and 37 shall be deemed concluded.
2. The deposition shall be further deemed the individual deposition of May Lew as a Group 1 Witness pursuant to the terms of section II(a)(2) of Case Management Order #9 Regarding Deposition Protocol for Fact Witnesses and deemed concluded.
3. All further PMQ topic depositions shall be expressly limited to questioning that is reasonably within the scope of the specifically noticed topic(s). C.C.P. § 2025.420(b)(10).

Defendant intends to file the motion promptly following the finalization of the video and receipt of the deposition transcript.

We have received correspondence from Developer Plaintiffs confirming that they have no questions for this PMQ. We also understand that Government Plaintiffs are willing to propose a resolution that would involve an additional, limited deposition session with specific conditions on attendance and questioning. In the absence of a formal written proposal that addresses each of the items listed above, however, SoCalGas, is unable to provide a response to such a concept.

Please let us know if you have any questions or would like to schedule a time to discuss this matter further.

Sincerely,



Collie F. James, IV

cc: James J. Dagna
David Schrader
Yardena Zwang-Weissman
Deanne L. Miller
Michelle Park Chiu
Miguel Bahamon
Jessica Brown
Catherine Weiman

Paul Keisel
May 9, 2018
Page 3

Jason H. Tokoro
Michael Leslie
R. Rex Parris
Mariana McConnell
Ray Boucher
Robin Greenwald
Frank Petosa
Roland Tellis

EXHIBIT I

Via E-mail (kiesel@kiesel-law.com)

May 15, 2018

Paul R. Kiesel, Esq.
KIESEL LAW LLP
8648 Wilshire Boulevard
Beverly Hills, California 90211-2910

Re: Southern California Gas Leak Cases (JCCP No. 4861)

Dear Paul,

How do the rules of complex litigation allow defense counsel to sidestep a good faith attempt to meet and confer and send a defamatory letter to third parties under the guise of a meet confer letter?

The Morgan Lewis' letter dated May 9, 2018, fails to cite to any page in the transcript to support its libelous comments regarding Mr. R. Rex Parris. Their letter attempts "to create 'a record' of events that have not occurred" in violation of the Guidelines for Civility adopted by the L.A. Superior Court. (See, Guidelines for Civility, Ch. 3, Appendix 3.A(d).) Private plaintiffs seek to set the record straight.

There is no dispute the gas composition topics in the deposition notice were written to obtain corporate testimony by SoCalGas regarding the chemicals and constituents in natural gas, topics that include but are not limited to the benzene constituents. (See Topics 36 & 37.) Indeed, from the beginning of the SS25 blowout to the present, the residents of Porter Ranch asked SoCalGas to identify known carcinogens like benzene. SoCalGas responded by posting online a "Benzene Fact Sheet" to assure residents benzene is simply a "trace component of natural gas."

Before this deposition, no one knew SoCalGas redefined the term "trace levels of benzene." Merriam Webster defines trace "as an amount of a chemical constituent not always quantitatively determinable because of minuteness." California's Office of Environmental Health Hazard Assessment (OEHHA) set the benzene reference exposure level (called an REL) – the human health standard is .001 ppm for residents facing 8 hour and/or chronic exposures to benzene. Since benzene can be detected down to .001 ppm, "trace" or "indeterminable" is not descriptive of benzene levels that range from .001 ppm to 9.9 ppm. Benzene at these levels poses serious health consequences, especially to children.

Upon cross-examination, the SoCalGas witness designated most qualified to testify regarding the gas composition admitted there was benzene in the gas, but SoCalGas almost always only shows benzene in trace amounts:

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Q Anything between zero and one is a trace amount?

A No. Anything in a part-per-million level would be a trace amount.

Q What about 2 parts per million?

A That would be -- for benzene, that would be a trace amount.

Q When does it no longer become a trace amount, when it becomes a matter of concern?

A It would be something I would have to -- well, when I do see something like a double digit, I would have to run it through our safety department and, you know, ask them that question, if that's an issue or not.

But I don't get it. I don't have those -- you know, I look, there's 1 ppm, it is in the gas. That's a trace amount. It is not an issue.

Q Okay. But I thought your job was to alert safety if the constituent parts of the gas exceeded certain limits?

A Well, yes. So --

Q Safety doesn't even know about it until you tell them; right?

A Right. So we have -- when we do have our -- when we do here -- or we do test, we run it. If there is a certain level above, like, say, a double-digit number or something that I wouldn't be used to seeing, I'm used to seeing 1 or 2. I'm not used to seeing something greater than -- you know, anything greater than 2. Nothing greater than 10.

If we do, then I would run it by safety. If it's -- you know, if it is there and we tested it and confirmed it, we would run it by our safety department.

Q Okay. So you don't get involved in benzene testing until it reaches 10 parts per million or more; is that correct?

A We don't -- it depends on who calls me and when they are testing -- if they are surprised by it, we will -- I'll say, oh, I got this level, and then I will give a copy to our safety people to make sure it is okay. It is their concern; right?

So -- but from my experience, I know when it is 1 or 2 ppm, it is a -- there's not an issue from our safety department. (Lew, May (Vol. 01) - 05/01/2018 ("Lew Depo.") at 113:7-115:3.)

According to the SoCalGas person most qualified to testify about the gas composition, the "trace" benzene levels at Aliso Canyon are 1,000 to 9,999 times too high for the safety of the community. If this is the standard used by SoCalGas to define "trace" in its public communications about the SS-25 incident, it causes us to wonder if SoCalGas is attempting to block Mr. Parris from completing the deposition to prevent the community from knowing about their deceptive definition of the term "trace"?

If SoCalGas is not trying to block the discovery of the facts, the letter from Morgan Lewis appears to have one primary purpose: tarnish the reputation of Mr. Parris. The complaints by Morgan Lewis, as discussed below, are at best petty and at worst, fabricated. We do not

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address all of the issues with the Morgan Lewis letter and will do so in our Motion to Compel if that becomes necessary.

Mr. Collie F. James, IV of Morgan Lewis' claim we arrived after 9:00 a.m. is not a lie – but, the truth is another matter. On the day of the deposition, it was raining, and there was fog on the Angeles Crest Highway. We contacted the government attorneys as soon as cellular reception made it possible and advised them at 8:48 a.m. we would be late. We arrived sometime around 9:15 a.m. and went to the security desk to go through the check-in process. SoCalGas did not ask the government attorneys or Toll Brothers to start the deposition despite having ample opportunity. We thought this was out of professional courtesy, not any built up basis for criticizing counsel.

Similar problems arise with the allegation that Mr. Parris was late following the lunch break. Morgan Lewis demanded that Mr. Parris stop his cross-examination of the witness on a document showing benzene levels in gas at Aliso Canyon ranging from a low 220 parts per million to 447 parts per million. (See, 132:16 to 144:8.) At these levels, benzene in natural gas at Aliso Canyon is 220,000 to 447,000 times higher than the reference exposure level set by the state for public exposure to benzene.

Morgan Lewis demanded to break for lunch in the middle of questioning on this document, and counsel ignored Mr. Parris' request to complete his questions regarding this exhibit. The record shows that Morgan Lewis walked out at 12:26 p.m. Mr. Parris then advised you that he arranged for a room next door at the Omni Hotel to briefly rest, and he would return in 1 ½ hours.

You called Mr. Parris after less than an hour and told him the Deputy Attorney General wanted to start her examination of the witness. Mr. Parris agreed, and the AG began her questioning at 1:38 p.m. Mr. Parris returned shortly after that. He resumed questioning the witness after the AG concluded at 3:59 PM. Defense counsel never objected to this procedure.

Morgan Lewis also accuses the Parris team of taking "the deposition exhibits with them" during lunch. So, what? All of the documents are in digital format and are equally accessible to every attorney in the case. It is true; the Deputy Attorney General left her office without copies of exhibits she intended to use at the deposition. She asked us to bring copies. We agreed to make two sets of copies for her, compiling over one thousand pages. The copies were delivered to the deposition as soon as the local copy service completed the job. There was no delay.

To be clear, Mr. Parris suffers from physical disabilities and occasionally requires a reasonable accommodation especially when he is forced to work in a hostile work environment. The L.A. Times and other media reported these health problems and presumably, SoCalGas and Morgan Lewis are aware of these significant health issues. Nonetheless, Mr. James seemed to create a

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hostile environment from the outset deliberately. So much so that Mr. Parris began the deposition with the following introduction:

Q I represent the plaintiffs, some of the plaintiffs, along with everybody else. Before we start I wanted to let you know that whenever I do these, especially when counsel like that is staring at me, it makes me really nervous, and when I get really nervous, my voice drops and people can't hear me. So if at any time you can't hear me, will you tell me?

A Yes. (Lew Depo. at 9:4-9:12.)

Mr. Parris then endured over 342 objections by Morgan Lewis; only four claiming privilege and very few going to the form of the question.

When Mr. Parris objected to Mr. James yelling at him, Mr. James justified his lack of civility by claiming Mr. Parris raised his voice at the witness. A review of the videotape belies this allegation. Nonetheless, Mr. Parris apologized to the witness. (See, Lew Depo. at 236:14-237:1.)

In response to Mr. James' continued attempts to bully Mr. Parris, Mr. Parris explained to defense counsel that he was not going to work in a hostile environment. He told Mr. James that his behavior was causing his blood pressure to rise, and it was endangering his life. (Id. at 237:2-6.) Mr. James acknowledged he heard Mr. Parris, but Mr. James never apologized.

Mr. James' letter falsely alleges: "Indeed, at the very outset of his questioning, Mr. Parris admitted to having never read or even seen the PMQ topics." Defendants SoCalGas and Sempra Energy designated the witness as the Person Most Qualified to testify concerning:

36. The contents of the gas stored at the FACILITY the week before the INCIDENT, including but not limited to, the constituents and/or components of the gas, quantities of each constituent, and total quantities.

37. The contents of the gas stored at the FACILITY during the five (5) years prior to the INCIDENT, including but not limited to, the constituents and/or components of the gas quantities of each constituent, and total quantities.

Mr. Parris asked the witness about her understanding of what she was going to testify to on behalf of the defendants:

Q Do you understand when we talk about gas composition, we are talking about the natural gas matrix coming out of Aliso Canyon? Do you understand that?

A Yes.

Q Okay. And is that what you were prepared to answer, the five years before the blowout?

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A I provided data for that time period because that was the question asked.

Can I -- is it possible if I could see those questions, please?

Q See the questions?

A Yes, that you were asking. The two questions.

Q Of course.

A Just to remind me of those two questions. Not yours. What I was here for originally, the two questions that I'm here for.

Q If your counsel wants to show you something, he certainly can.

A You can't show them to me?

Q I've never seen them.

A Oh. (Lew Depo. at 14:14-15:10.)

Morgan Lewis somehow believes this exchange is an admission by Mr. Parris that he never read the PMQ designation. Really?

It is true Mr. Parris attempted to examine Ms. Lew regarding documents he did not show her.

Q Okay. You are refusing to answer my questions about the document?

A If you are not going to show me a document that you're questioning on, then I'm not going to continue.

MR. PARRIS: Okay. Are you concurring with that?

MR. JAMES: Yeah.

MR. PARRIS: Okay. Thank you. You are familiar with Evidence Code 768; aren't you? Is there a reason why your witness is not complying with Evidence Code 768?

MR. JAMES: It is not a memory test on her part. She feels like you are trying to trick her by showing -- asking her questions of out-of-context parts of a document. She said she would feel more comfortable answering about a document by seeing the document. If you have a reason why you refuse to show it to her, then that's on you, not on her. (Lew Depo. at 311:16-312:8)

Mr. Parris told me that issues like these sometimes arise when one attorney has a lot deposition experience, but little trial experience. He said that it is hard for them to see when something attorneys think is insignificant will become the most persuasive fact to a jury. Regardless of the reasons, it is not Mr. Parris' job to explain the Evidence Code to opposing counsel.

Morgan Lewis, objects to us questioning the witness regarding a document she prepared describing benzene testing protocols that she authored 22 years ago. This document and many others are relevant because this witness testified benzene testing is not done at Aliso Canyon. (Id. at 51:15-16; 51:25.) This, and other documents like it, are relevant for a host of reasons and are also prior inconsistent statements.

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The witness testified that the “gas composition doesn’t vary very much.” (Id. at 293:4; and, 42:25 (“the gas doesn’t vary that much”).) This testimony makes information about test data in prior years probative of the gas composition at the time of the blow-out.

There must be a reason SoCalGas stopped testing for benzene after this witness wrote a policy requiring SoCalGas test the benzene levels in gas from major suppliers every 30 days. It is understandable why this document upset house counsel who was attending the deposition. But, his frustration does not license them to defame Mr. Parris or to interfere with his clients’ right to legal representation of their choice.

Finally, Morgan Lewis never complained that Mr. Parris was mocking the witness. On the contrary, Mr. Parris politely, but firmly, engaged in appropriate cross-examination. Mr. Parris did object to Morgan Lewis calling for breaks when the witness was confronted with difficult questions or shown embarrassing documents. And, Mr. Parris voiced his objections so that any disputes could be resolved at the deposition or later by the Court.

In light of this record, it is hard to discern any legitimate basis for Morgan Lewis to write to you, and not Mr. Parris. It is equally difficult to understand why Morgan Lewis agreed to bring the witness back, but now, is unwilling to honor their agreement. (See, e.g., Lew, May at 317:24-318:14, and 320:25-321:2.)

I suppose that Mr. Parris should be flattered that SoCalGas is willing to go to such lengths to keep him from deposing this witness regarding a primary issue in the case, but he is not. The toxic gases SoCalGas released into Porter Ranch severely injured thousands of Californians. SoCalGas knew what they were calling “trace” levels of benzene exceeded the human health exposure levels for residents living in Porter Ranch. They also knew that these toxic gases are particularly harmful to children, and that these toxins will leave children with long-term health consequences including horrible deaths for some of them. SoCalGas decided to hide this information from regulatory agencies and the community. Now they are using every discovery trick and devise they can imagine to escape accountability.

Where do we go from here?

First, it is our understanding that Morgan Lewis and the government attorneys informally agreed that SoCalGas would produce the witness to conclude her deposition if Mr. Parris does not attend. The government attorneys conveyed this information to you, and Morgan Lewis referenced it in the May 9, 2018 letter.

You and Mr. Parris agreed that we would attempt to meet and confer with Morgan Lewis to resume the deposition, and if we are unsuccessful, we will file a motion to compel and seek a protective order to stop the unceasing objections. We have prepared a memo on the scope of what is permissible in a PMQ deposition and will forward it to you upon request.

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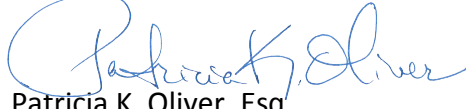
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Common sense and civility suggest that a good faith meet and confer require discussing discovery disputes with the attorneys handling the discovery. Morgan Lewis apparently disagrees, but we do have concerns about this witness' repeated refusals to answer questions. Perhaps, we should request a time to meet with Morgan Lewis to confer regarding bringing this witness back to complete her deposition. If we are unsuccessful, we should bring a motion to compel and seek a protective order.

We are copying everyone who Morgan Lewis copied with their May 9, 2018, letter. We are requesting everyone who receives a copy of this letter retain all emails, texts, and documents relating to the May Lew deposition and any discussions regarding Mr. Parris not resuming the depositions. Efforts should be made to preserve these records so they can be produced pursuant to a subsequent subpoena.

Sincerely,

PARRIS LAW FIRM



Patricia K. Oliver, Esq.

CC: R. Rex Parris

Collie F. James, IV

Miguel Bahamon

Jessica B. Brown

Catherine Wieman

Jason H. Tokoro

Michael Leslie

Ray Boucher

Robin Greenwald

Frank Petosa

Roland Tellis

Mariana McConnell

James J. Dagna

David L. Schrader

Deanne L. Miller

Yardena R. Zwang-Weissman

Michelle Park Chiu

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 At the time of service, I was over 18 years of age and **not a party to this action**. I am
4 employed in the County of Los Angeles, State of California. My business address is 8648
Wilshire Boulevard, Beverly Hills, CA 90211-2910.

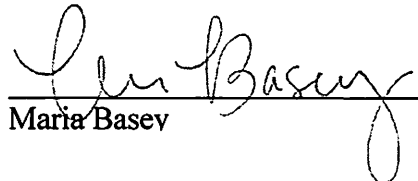
5 On June 6, 2018, I served true copies of the following document(s) described as
6 **AMENDED DECLARATION OF R. REX PARRIS IN SUPPORT OF PRIVATE**
7 **PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF PMQ GAS COMPOSITION**
action as follows:

8 **BY ELECTRONIC SERVICE VIA CASE ANYWHERE:** In accordance with the
9 Court's Order Authorizing Electronic Service requiring all documents to be served upon interested
parties via the Case Anywhere System.

10 **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the
11 persons at the addresses listed in the Service List and placed the envelope for collection and
12 mailing, following our ordinary business practices. I am readily familiar with Kiesel Law LLP's
13 practice for collecting and processing correspondence for mailing. On the same day that the
correspondence is placed for collection and mailing, it is deposited in the ordinary course of
14 business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

15 I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

16 Executed on June 6, 2018, at Beverly Hills, California.

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