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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

COORDINATION PROCEEDING)	JCCP No. 4861
SPECIAL TITLE (Rule 3.550))	
)	
)	
SOUTHERN CALIFORNIA GAS LEAK)	Hon.
CASES)	Carolyn B. Kuhl
)	Department SS12
_____)	
)	
THIS DOCUMENT RELATES TO:)	
)	
All Actions.)	
_____)	

Friday, February 21, 2020

Videotaped Deposition of DANIEL WALZEL,
as Person Most Qualified of Boots & Coots
Services LLC and in his Personal Capacity,
held at Morgan, Lewis & Bockius, LLP, 1000
Louisiana Street, Suite 4000, Houston, Texas,
commencing at 9:14 a.m. on the above date,
before Susan Perry Miller, Registered
Diplomate Reporter, Certified Realtime
Reporter, Certified Realtime Captioner, and
Notary Public.

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1 (Friday, February 21, 2020, 9:14 a.m.)

2 THE VIDEOGRAPHER: Stand by.

3 We're now on the record. My name is
4 Brian Bobbitt. I'm a videographer for
5 Golkow Litigation Services. Today's
6 date, February 21st, 2020. The time
7 is 9:14 a.m.

8 This video deposition is being
9 held in Houston, Texas, in the Porter
10 Ranch Southern California Gas Leak
11 cases, JCCP -- I forgot the number.

12 MS. BOLTON: 4861.

13 THE VIDEOGRAPHER: -- 4861 for
14 the Los Angeles Superior Court. The
15 deponent is Danny Walzel. Counsel
16 will be noted on the stenographic
17 record.

18 Will the reporter please swear
19 in the witness.

20 (Witness sworn by the
21 stenographer.)

22 (Examination begins on next
23 page.)

24 --oOo--

25 --oOo--

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P R O C E E D I N G S

DANIEL WALZEL,

having sworn or affirmed to tell the truth,
the whole truth, and nothing but the truth,
was examined and testified as follows:

EXAMINATION

BY MR. KELLY:

Q. Good morning.

A. Good morning.

Q. My name is Michael Kelly and I
represent approximately 35,000 people,
families, that live or lived adjacent to the
Aliso Canyon during the SS-25 blowout.

MR. KELLY: Before we begin
your deposition, we have made some
accommodations with regard to
consolidating your deposition as a
person most qualified and as yourself
individually into one deposition, and
we were going to put on the record an
agreement among counsel as to how that
will proceed.

MR. LOTTERMAN: Good morning.

Mr. Walzel was originally scheduled to
appear as a PMQ witness on February 19

1 and as a fact witness on
2 February 21st. However, he had some
3 personal circumstances arise which
4 made him unable to appear on the 19th.

5 So upon agreement of counsel,
6 we agreed to suspend that deposition
7 and combine both his PMQ and his
8 percipient deposition today,
9 February 21st.

10 To accommodate that
11 combination, all parties have agreed
12 to the following: Anyone can ask
13 questions and we will assume that
14 Mr. Walzel is answering them in his
15 capacity as the person most qualified
16 on behalf of Boots & Coots.

17 If for whatever reason someone
18 believes that he is testifying outside
19 the scope of the PMQ notice, they can
20 object on scope grounds and then the
21 testimony automatically becomes fact
22 testimony.

23 So --

24 MR. KELLY: Assuming the
25 objection is sustained by someone at

1 some point.

2 MR. LOTTERMAN: Of course. Of
3 course. So there's no need to go off
4 and on the record for the various
5 depositions. There's no need to
6 segment various pieces of testimony.
7 His testimony will be presumed as PMQ
8 testimony unless a scope objection is
9 made and sustained.

10 MR. KELLY: So agreed.

11 MR. ESBENSHADE: Agreed.

12 MR. HELSLEY: Agreed. And I'll
13 just add that he's here as the PMQ for
14 the kill attempts that occurred prior
15 to December 22nd, 2015, done by
16 Boots & Coots.

17 MR. KELLY: Thank you.

18 BY MR. KELLY:

19 Q. Mr. Walzel, could you please
20 state and spell your name for the record?

21 A. Danny, D-A -- or legal name
22 Daniel, D-A-N-I-E-L, Walzel, W-A-L-Z-E-L.

23 Q. Okay. Have you given a
24 deposition before?

25 A. I have not.

1 Q. Okay. Let me go through
2 briefly a few ground rules for the
3 deposition. You've been placed under oath by
4 this young lady to my left, which means that
5 you are required under the penalty of perjury
6 to tell the truth and to give accurate and
7 honest testimony.

8 Do you understand that?

9 A. I do.

10 Q. Okay. And if you don't, you
11 can get in trouble, and I won't go through
12 all the different types of troubles you can
13 get into. But it's important that you know
14 that you're under oath and tell the truth.

15 A. Uh-huh.

16 Q. It would be helpful also if
17 during the deposition you answer audibly --
18 that is, yes or no, and don't use things like
19 mm-mmm or huh-uh --

20 A. Okay.

21 Q. -- because it's hard for this
22 young lady to take that down. She may have
23 to guess what you're saying.

24 We're going to take your
25 deposition for some period of time today, but

1 we'll try to take a break about every hour.
2 If you'd like to take a break at some time
3 when we're still going, just ask. Please
4 answer any questions that are pending and
5 then just ask to take a break, and we'll
6 accommodate you. Okay?

7 A. Okay.

8 Q. Please don't guess or
9 speculate.

10 A. Right.

11 Q. But we are entitled to
12 estimations, if you have estimations on
13 things, okay? If you don't know the answer
14 to a question, just tell us you don't know
15 the answer. You're not required to try to
16 answer questions you don't know how to answer
17 or don't have the memory to answer questions.

18 And if you don't understand the
19 question or even think you don't understand
20 the question, tell us and we'll do our best
21 to rephrase it or reframe it so that you can
22 understand it.

23 A. Okay.

24 Q. If you do answer the question,
25 we're going to assume that you did understand

1 it and gave us your best answer. Okay?

2 A. Okay.

3 Q. Any questions before we go?

4 A. No.

5 Q. Okay. Would you please give
6 the jury a brief summary of your educational
7 history?

8 A. I graduated high school, and
9 then I went to Austin College in Sherman,
10 Texas. And I have a bachelor of arts from
11 there and then Texas A&M University, bachelor
12 of science, petroleum engineering.

13 Q. Bachelor of science?

14 A. Yes, sir.

15 Q. Okay. When did you receive
16 that?

17 A. 2002.

18 Q. Have you had any other formal
19 education?

20 A. No. After college, it was just
21 all industry training.

22 Q. Okay. Have you attended any
23 technical seminars of substance, like a
24 week-long class or two weeks or --

25 A. Yes.

1 Q. What would those be in?

2 A. Oh, I took a directional
3 drilling class that might have been four or
4 five days. I took mud school at a -- online,
5 that was two weeks.

6 Q. What's mud school?

7 A. It wasn't -- it wasn't the same
8 mud school you'd go to if you were learning
9 to be a mud engineer, but it was one week of
10 learning about water-based muds and one about
11 oil-based muds.

12 Q. Okay. Anything else?

13 A. I did -- yes. So I'm trying to
14 think of them all, but I did a class -- these
15 were Halliburton, they call them DEAL
16 classes, but it's -- I don't know what it
17 stands for, but I did a week-long class on
18 directional drilling and the software COMPASS
19 and a casing design class.

20 I'm trying to think of the
21 names of the other ones. I don't remember
22 what the other names were, but, yeah, there
23 was three or four classes there that were a
24 week long.

25 Then I've done, you know, well

1 control school every two years. That's -- I
2 mean, that's what I can think of right now.

3 Q. Okay. Could you please give
4 the jury a summary of your work history?

5 A. My work history?

6 Q. Yes, sir.

7 A. So after college I started with
8 Boots & Coots in the WellSure group, which
9 was -- it's tied in with insurance, but we do
10 like review of well plans, something like rig
11 audits, prevention work type stuff. And in
12 2003, Iraq started and I went over there.
13 And then that's where I, you know, kind of
14 started the well control.

15 And then, you know, since then
16 I moved into the -- you know, the well
17 control group and, you know, been doing it
18 since then.

19 Q. Okay. How long were you in
20 Iraq?

21 A. I think I made two and a half
22 months, maybe.

23 Q. Okay. How many wells did
24 Boots & Coots kill in Iraq?

25 A. We did, I think, three.

1 Q. Three, okay. Any of those take
2 more than 111 days?

3 A. No.

4 Q. Any of them take more than 10
5 days?

6 A. Yes, from what I can recall.

7 Q. What was the longest one?

8 A. There was one, I don't know,
9 might have been a week or two, but, you know,
10 we ended up stinging it, but we tried
11 several -- we tried two or three kill
12 attempts on it because, you know, Iraq didn't
13 give us any information on the wells before
14 we showed up.

15 Q. Shame on them.

16 A. Yeah.

17 Q. So you've worked for Boots &
18 Coots since approximately 2002?

19 A. Yes, sir.

20 Q. Okay. And what have your --
21 strike that.

22 What positions have you held?

23 A. Well control specialist
24 engineer.

25 Q. Any others?

1 A. No.

2 Q. Okay.

3 A. You know, junior and senior.

4 Q. So you started out as a

5 junior --

6 A. Yes.

7 Q. -- and went to senior?

8 A. Yeah.

9 Q. What's your present title?

10 A. Senior well control engineer,

11 specialist. Well control specialist

12 engineer.

13 Q. And when did you first become
14 involved in any way in the Aliso Canyon SS-25
15 blowout?

16 A. I don't remember the date, but
17 I guess when they called us in October, early
18 November sometime.

19 Q. Okay. Were you one of the
20 initial group of Boots & Coots personnel to
21 travel to Southern California?

22 A. Yes, sir.

23 Q. Did you go to Southern
24 California with any other personnel?

25 A. It was James Kopecky and Danny

1 Clayton.

2 Q. And when did you leave Southern
3 California?

4 A. First -- first part of
5 December, I believe.

6 Q. Do you recall when?

7 A. Not the -- no. It was first --
8 maybe the second week of December.

9 Q. I'm going to try not to mess
10 these up. So this is the first deposition we
11 did and this is the second and this is the
12 third.

13 Do you recall that you left
14 Southern California and returned home to
15 Texas either December 4th or December 14th of
16 2015?

17 A. Yeah, I don't -- I mean, it was
18 about that time. I don't know what date.

19 Q. Do you recall giving testimony
20 before the California Public Utilities
21 Commission on August 8th, 2018?

22 A. I do.

23 Q. How did that occur?

24 A. They asked --

25 MR. HELSLEY: Objection, vague.

1 You can answer the question.

2 A. Like how did -- how did it --
3 what do you mean by how did it occur?

4 BY MR. KELLY:

5 Q. Did someone ask you to go give
6 testimony?

7 A. Yes. Well, we were -- I mean,
8 you know, they requested we come out and talk
9 to them.

10 Q. Okay. How did that request get
11 transmitted to you?

12 MR. HELSLEY: I'm going to
13 object to the extent it calls for
14 attorney-client privilege. So
15 anything that we discussed, you're not
16 allowed to talk about, but anything
17 else, go ahead and answer the
18 question.

19 A. Yeah. I mean...

20 BY MR. KELLY:

21 Q. Were you advised by someone
22 affiliated with Boots & Coots that they
23 wanted you to come out and talk to them?

24 A. Yeah. I mean, I didn't -- yes.

25 Q. You didn't volunteer?

1 A. Yeah. I mean, yeah, I was just
2 asked if I would go out there and talk to
3 them so I did.

4 Q. Okay. And you went out and you
5 actually gave testimony under oath. Is that
6 correct?

7 A. Yes, sir.

8 Q. And you went with Mr. Kopecky?

9 A. Yes, sir.

10 Q. And if I understand the forum
11 that that occurred in, it was something that
12 took place in a conference room?

13 A. It was, yeah, a room.

14 Q. Okay. And the two of you gave
15 testimony at the same time. Is that right?

16 A. Yes, sir.

17 Q. Okay. I'm going to show you
18 what's been marked as Exhibit 246-2 to
19 Mr. Kopecky's deposition, and it is a
20 transcript of the testimony you and
21 Mr. Kopecky gave under oath to the California
22 Public Utilities Commission on August 8th,
23 2018. Okay?

24 A. Okay.

25 Q. Thank you. If you could turn

1 to page 76 and 77.

2 A. Uh-huh. Okay.

3 Q. If you look down at the bottom
4 of page 76 and the top of page 77, there's a
5 statement by you: "I was. And I either got
6 home on December 4th or December 14th."

7 Do you see that?

8 A. Yes, sir.

9 Q. Does that refresh your
10 recollection as when you returned home from
11 Southern California?

12 A. Yes. I'm -- either the 4th or
13 the 14th.

14 Q. Okay. And that was your best
15 recollection?

16 A. Right, yes, sir.

17 Q. That was your best recollection
18 and testimony as of August 18 -- August 8,
19 2018?

20 A. Yes. I mean, that was the best
21 I could remember.

22 Q. Okay. Had anyone started
23 drilling the relief well by the time you left
24 Southern California?

25 A. I don't recall if they -- if it

1 had spud yet or not, but preparations were --
2 were started.

3 Q. Okay. If you could turn the
4 page to page 78. In response to a question,
5 you testified, beginning at line 21: "But
6 they didn't -- they hadn't started drilling
7 by the time I got out of there. They were
8 still in the rigging-up process."

9 A. Okay.

10 Q. Do you see that?

11 A. Yes, sir.

12 Q. Does that refresh your
13 recollection that it was your best testimony
14 as of August 8th, 2018, that at the time you
15 left Southern California, they had not yet
16 started drilling the relief well?

17 A. Yes. I mean, that was my best
18 testimony, that they hadn't spud yet.

19 Q. Okay. And could you tell the
20 jury what spud means?

21 A. Just when the bit -- you put
22 the bit on the ground and start drilling.

23 Q. Okay. Doesn't have anything to
24 do with potatoes?

25 A. No, not in Cal- -- maybe in

1 Idaho.

2 Q. Definitely in Idaho.

3 Okay. So you, Mr. Kopecky and
4 Mr. Clayton were the first wave of Boots &
5 Coots employees to go to Aliso Canyon. Is
6 that correct?

7 A. Yes, sir.

8 Q. Yes?

9 A. Yes.

10 Q. One other thing I didn't
11 mention earlier is if you just -- if you wait
12 until I finish my question --

13 A. Okay, I'm sorry.

14 Q. -- and then probably just take
15 a little beat, a pause, in case counsel wants
16 to make an objection, and then they can do
17 that, and then you can go ahead and answer
18 the question. Okay?

19 A. Okay.

20 Q. All right. And Mr. Clayton was
21 a senior well control specialist?

22 A. Yes, sir.

23 Q. And what was your title at the
24 time?

25 A. Well control specialist

1 engineer, senior, I believe.

2 Q. Okay. Was -- and Mr. Kopecky
3 was a well control specialist?

4 A. Yes, sir.

5 Q. Was Mr. Clayton designated
6 lead?

7 A. Yes.

8 Q. And so when the three of you
9 got to Aliso Canyon, he was kind of in charge
10 of the three of you?

11 A. Yes.

12 Q. Okay. Mr. Kopecky testified
13 that when you were working at the SS-25 well
14 site, that he was sort of the hands-on guy at
15 the well pad, that you assisted him there but
16 you were also involved in some meetings, and
17 that Mr. Clayton was more involved in
18 meetings than assisting on the well pad.

19 A. Correct.

20 Q. Is that --

21 A. It's pretty -- yeah, that's
22 accurate.

23 Q. Is that accurate? Okay.

24 How many meetings did you
25 attend?

1 A. Oh, I don't have an exact
2 number. Every morning. Every morning we'd
3 have, you know, our morning safety operations
4 meeting, and then, you know, meetings
5 throughout the day, but I don't have a number
6 of how many I attended.

7 Q. Okay. Where did these meetings
8 take place?

9 A. On location.

10 Q. Near the well pad?

11 A. No. They would have been down
12 the -- down the hill from them. Sometimes --
13 I think they brought in an office or
14 something.

15 Q. Were cell phones allowed at the
16 well pad?

17 A. I don't recall. I mean, in the
18 hot zone -- I don't recall if they -- you
19 know, I don't remember any mention --
20 anything about cell phones, really.

21 Q. Okay. You don't recall that
22 they were not allowed?

23 A. Yeah. I mean, they -- usually
24 for safety you don't want them in the -- you
25 know, in the hot zones.

1 Q. With regard to well kills --

2 A. Yes.

3 Q. -- you were present for a
4 number of well kills. Is that correct?

5 A. Yes.

6 Q. By the time you three arrived
7 in Southern California, at Aliso Canyon, was
8 it your understanding that at least one kill
9 attempt had been executed by the SoCalGas
10 people?

11 A. I mean, you know, I wasn't -- I
12 wasn't there, so -- but you just, you know,
13 were counting the numbers. But yeah, no, I
14 wasn't -- you know, they -- yeah, I mean, I
15 wasn't there, you know, so I can't comment on
16 any kill attempts that they did.

17 Q. Okay. My question was just did
18 you become aware that they had attempted one.

19 A. I mean, I knew they'd pumped on
20 it.

21 Q. What does that mean?

22 A. Or, you know, you pump fluid,
23 you know.

24 Q. Is that a well kill attempt?

25 A. I mean, you know...

1 Q. Yes?

2 A. Yeah. I mean, you know, I
3 don't -- you know, if they were trying to
4 kill it or pump on it or, you know...

5 Q. Okay. Well, when you arrived
6 in Southern California, did you attempt to
7 familiarize yourself with the history and
8 condition of SS-25, the well that was
9 undergoing a blowout?

10 A. I looked -- I looked at the
11 drilling records.

12 Q. Okay. What are drilling
13 records?

14 A. You know, like when the well
15 was drilled, you know, the daily reports from
16 the drilling.

17 Q. Okay. What type of daily
18 reports are you referring to?

19 A. You know, drilled from this
20 depth to this depth, with this mud weight.
21 You know, any problems that might have been
22 encountered while drilling.

23 Q. So you're talking about the
24 initial drilling --

25 A. Yes, sir.

1 Q. -- of SS-25?

2 A. Right. You know.

3 Q. What year was SS-25 originally
4 drilled in?

5 A. I believe in the '50s.

6 Q. Okay. 1953? Do you recall?

7 A. I mean, I knew it was in the
8 early '50s, so, I mean, '53 is --

9 Q. Okay. I'm not telling you, I'm
10 asking you.

11 A. Right.

12 Q. Does that -- does 1953 comport
13 with your recollection --

14 A. Yes.

15 Q. -- of your review of the
16 drilling records?

17 A. Yes, the best I can remember.

18 Q. Okay. And what other records
19 did you look at to prepare yourself to deal
20 with the SS-25 blowout?

21 A. I don't -- I think there was
22 maybe some gamma ray logs. But, you know,
23 the drilling records, casing, tubings, things
24 like that.

25 Q. Did you attempt to ascertain

1 whether or not SS-25 had ever undergone a
2 workover with a casing integrity inspection
3 at any time prior to the blowout which
4 occurred on August 23rd, 2015?

5 MR. LOTTERMAN: Michael, I
6 think you misspoke.

7 MS. BOLTON: October 23rd.

8 MR. KELLY: Oh, yes, I did.

9 Thank you.

10 BY MR. KELLY:

11 Q. Let me rephrase the question.
12 Did you attempt to ascertain whether or not
13 SS-25 had ever undergone a workover with a
14 casing integrity inspection at any time prior
15 to the blowout which occurred on
16 October 23rd, 2015?

17 A. Did I -- can you repeat the
18 first part of the question?

19 Q. Let me just read it back.

20 A. Okay.

21 Q. Did you attempt to ascertain
22 whether or not SS-25 had ever undergone a
23 workover with a casing integrity inspection
24 at any time prior to the blowout which
25 occurred on October 23rd, 2015?

1 A. I don't recall that now. You
2 mean did I -- am I asking if they had ever
3 done it?

4 Q. Did you attempt to ascertain
5 whether or not they had ever done it?

6 A. I mean, I asked for, you
7 know -- you know, we asked for records of the
8 logs and stuff, so I don't -- I don't recall
9 if I specifically asked for if they'd ever
10 done it.

11 Q. Did you make any attempt to
12 determine whether or not they had ever done
13 that?

14 MR. HELSLEY: Objection, asked
15 and answered, but go ahead.

16 A. Oh. I'm sorry, can you repeat
17 the question?

18 BY MR. KELLY:

19 Q. Sure.

20 Did you make an attempt to
21 determine whether or not SS-25 had ever
22 under --

23 A. I don't -- oh, sorry.

24 Q. -- undergone a workover to
25 inspect the integrity of the casing prior to

1 the time that the blowout occurred?

2 A. I don't recall asking for one.

3 Q. Okay. Did you ask for the
4 historical records of SS-25?

5 A. Yes.

6 Q. And did you receive them?

7 A. Yes. Like I said, the drilling
8 reports, gamma ray logs, you know, is the
9 ones I remember looking at when I first got
10 there.

11 Q. Okay. Did you make a
12 determination that SS-25 had or had not ever
13 undergone a workover with a casing integrity
14 inspection at any time prior to the
15 blowout --

16 A. That --

17 Q. -- which you were there to
18 address?

19 A. Yeah, no. That wasn't
20 something I determined or was able to
21 determine.

22 Q. Okay. Was that not important
23 to your job?

24 A. I mean, if the information is
25 there, then, you know, I mean -- yeah. I

1 mean, I guess not every well has one.

2 Q. Has a workover?

3 A. Oh. I thought you're talking
4 about the logs. Or casing integrity tests.

5 Q. Okay. Yes, I'm referring to
6 casing integrity inspections --

7 A. Okay.

8 Q. -- such as a Vertilog or a
9 caliper inspection or USIT, that type of log.

10 A. Uh-huh. Right. No, I don't
11 recall looking at -- looking at any caliper
12 logs or the other log you mentioned.

13 Q. USIT or Vertilog?

14 A. Right.

15 Q. Okay. So you don't recall
16 seeing that any of those three casing
17 integrity inspections had been run --

18 A. Right.

19 Q. -- on SS-25 prior to the
20 blowout. Is that accurate?

21 A. Yeah, I don't recall seeing any
22 data on that.

23 Q. Okay. Did you look at any well
24 schematic diagrams?

25 A. Yeah, I'm sure I -- I mean,

1 yes.

2 Q. Okay.

3 (Sotto voce discussion.)

4 BY MR. KELLY:

5 Q. Mr. Walzel, let me show you an
6 exhibit that's been previously marked as
7 246-1, and it is an eight-page document, the
8 top e-mail of which is dated 10/24/2015.

9 In the middle of page 1 there
10 is an e-mail dated October 24, 2015, at 2339
11 from James Kopecky to Danny Clayton and
12 yourself. If you could take a look at that
13 document, please.

14 A. Okay.

15 (Document review by witness.)

16 BY MR. KELLY:

17 Q. Let me know when you've had a
18 chance to look at it, please.

19 A. Okay.

20 Q. Have you seen that document
21 before?

22 A. I'm sure I have.

23 Q. Okay. Was that document some
24 information that was sent by SoCalGas to
25 Mr. Kopecky, who forwarded it on to you?

1 A. I'm sure it was.

2 Q. Okay. And is there a well
3 schematic diagram contained in those
4 documents?

5 A. Yes.

6 Q. And does that well schematic
7 diagram depict a subsurface safety valve?

8 (Document review by witness.)

9 A. It says that there is a Camco
10 2?-inch subsurface safety valve.

11 BY MR. KELLY:

12 Q. Okay. And what page of the
13 document is that on?

14 MR. HELSLEY: You refer down to
15 the bottom right, you have the Bates
16 numbers you refer to.

17 A. Oh. 13893.

18 BY MR. KELLY:

19 Q. Okay. And at what depth or
20 location is that subsurface safety valve
21 depicted?

22 A. 8,451.

23 Q. Okay. When you arrived at
24 Aliso Canyon and addressed SS-25, did you
25 determine whether or not there actually was a

1 subsurface safety valve installed and
2 operational on the well?

3 A. I don't -- yes, as I recall,
4 there wasn't -- the profile was there.

5 Q. Okay.

6 A. But the -- I don't -- I don't
7 believe, no, there wasn't a safety valve in
8 it.

9 Q. So is it your testimony that
10 the subsurface safety valve had been removed?

11 A. From what I remember, yes.

12 Q. Okay. And when you say the
13 profile was there, are you testifying that
14 the housing which used to house the
15 subsurface safety valve was present but the
16 valve was not?

17 A. Correct.

18 Q. Okay. And was the condition of
19 the area where the subsurface safety valve
20 used to reside such that there was an opening
21 between the tubing of the well and the
22 annulus inside the production casing?

23 A. I believe there were ports in
24 it.

25 Q. Okay. And did you determine

1 whether or not that port was intentionally
2 left open?

3 A. I -- I wouldn't be able to tell
4 if it was intentionally or -- you mean the
5 ports in the housing?

6 Q. The port left by the housing.

7 MR. LOTTERMAN: I think he's
8 using the plural.

9 (Sotto voce discussion.)

10 BY MR. KELLY:

11 Q. Okay. When the subsurface
12 safety valve was removed, there was an open
13 space or spaces between the inside of the
14 tubing and the outside of the tubing or the
15 annulus. Is that correct?

16 A. Yeah, I believe that's the way
17 it was described to me.

18 Q. Okay. And was it -- strike
19 that.

20 Did you make a determination as
21 to whether that port or those ports were
22 intentionally left open to provide
23 communication between the inside of the
24 tubing and the annulus inside the production
25 casing?

1 A. Right. I'm not -- I'm not
2 familiar with that safety valve, and if they
3 could -- I don't recall if they could be
4 opened and closed.

5 Q. Okay. Was the safety valve
6 present?

7 MR. LOTTERMAN: Asked and
8 answered.

9 THE WITNESS: Do I answer that?

10 BY MR. KELLY:

11 Q. Yes.

12 A. Okay.

13 Q. You should answer after
14 everybody is done making noise.

15 A. Okay.

16 Q. You should answer the question
17 unless your attorney tells you not to.

18 A. Right. No, I -- like I
19 answered earlier.

20 Q. Okay. So it was gone?

21 A. Yes.

22 Q. Okay. And you don't recall
23 whether or not the ports or openings that
24 were left were able to be closed and opened
25 or whether they were just in a constant open

1 position?

2 A. Correct, yeah. I don't -- I
3 don't know exactly how this safety valve
4 works.

5 Q. Okay. Did you, as part of
6 your -- strike that.

7 When you began to address this
8 well with well kills, did you want to make
9 sure that the information you had about the
10 well was as accurate as possible?

11 A. Yes.

12 Q. And what did you do to make
13 sure that you had accurate information about
14 the condition of SS-25 before you attempted
15 well kills?

16 A. Well, you know, the casing,
17 tubing that was in the well, you know,
18 reservoir pressure, you know, surface
19 equipment. You know -- you know,
20 reservoir -- any information on the reservoir
21 and, you know, those would have been the main
22 things.

23 Q. Okay. Did you obtain a value
24 for reservoir pressure?

25 A. Yes. Well, I mean, we had

1 surface -- we had -- you know, there was
2 gauges on other wells in the -- nearby or
3 whatever that you could -- you know, you
4 could gather and get the reservoir pressure.
5 It was given to us.

6 Q. Okay. Is your testimony that
7 someone gave you the reservoir pressure?

8 A. Yes.

9 Q. Okay. Who gave you the
10 reservoir pressure?

11 A. Oh, I don't recall specifically
12 who gave it to me.

13 Q. Was it someone from SoCalGas?

14 A. Yes.

15 Q. Okay. So some individual from
16 SoCalGas provided you with a value for
17 reservoir pressure.

18 A. Yes, sir.

19 Q. Slow down just a little, okay?

20 A. Oh, okay.

21 Q. Okay. Do you recall what that
22 value was?

23 A. No, I don't remember the number
24 or the exact number.

25 Q. What else did you do to

1 familiarize yourself with the condition of
2 SS-25, if anything?

3 A. You know, just asked questions
4 and any available information that might
5 be -- be available.

6 Q. Okay. What did you do to
7 familiarize yourself with any well kill
8 attempts that had proceeded before you
9 arrived?

10 A. You know, any documentation.
11 You know, basically just records.

12 Q. What did you obtain in that
13 regard?

14 A. You know, the drilling records.
15 I mean, pretty much what I described earlier.

16 Q. When Boots & Coots does --
17 strike that.

18 When Boots & Coots attempts a
19 well kill, how do you go about planning the
20 well kill?

21 A. Well, I mean, everyone -- you
22 know, everyone's different, but if it's --
23 you know, if it's a rig that took a kick, you
24 know, shut-in pressures, volumes, things like
25 that. If it's blowing out, we want to know,

1 you know, where -- you know, flow paths, you
2 know, any estimated rates. Fluid -- you
3 know, reservoir fluid properties, things like
4 that.

5 Q. Okay. Do you commonly prepare
6 some type of document which would detail the
7 parameters of the well kill you're going to
8 attempt?

9 A. I mean, you know, we'd send
10 them a list, you know, we'd like this
11 information as far as casing design,
12 reservoir -- like, you know, the things I
13 mentioned earlier.

14 Q. Okay. I'm speaking
15 specifically to how you would go about
16 documenting planning a well kill attempt.
17 Okay?

18 A. Uh-huh.

19 Q. Do you put together some sort
20 of sheet which would detail the parameters of
21 how you're going to attempt a well kill?

22 A. Right, yeah. I'd either send a
23 list or ask for it verbally.

24 Q. Okay. But I'm not talking
25 about something you're asking for. I'm

1 talking about what documentation you would
2 prepare about a well kill you were going to
3 plan and attempt.

4 A. Right. So it would be the
5 same. Drilling records, surface equipment,
6 reservoir pressures, properties.

7 Q. Okay. Would you document --
8 would you document what you were going to
9 inject down or shoot down the well?

10 A. When you say shoot...

11 Q. Well, you're injecting some
12 type of kill fluid or kill substance into a
13 well in a kill attempt, right?

14 A. Yes.

15 Q. Would you document, before you
16 attempted a kill attempt, what it is you're
17 going to inject into the well to try to kill
18 it?

19 A. Yeah. I mean, it would be in a
20 program, you know, pump 9-pound mud,
21 whatever.

22 Q. Okay. So there would be some
23 documentation of what it is you're pumping
24 in.

25 A. Correct.

1 Q. Okay. Brine, mud, water,
2 whatever.

3 A. Yes, I'm sure there would be
4 documentation.

5 Q. And the weight?

6 A. Right.

7 Q. Okay. And would you document
8 how much you're going to pump in, the volume?

9 A. Yeah, there would be an
10 estimate, probably, in there.

11 Q. Okay. And would you document
12 how fast you're going to pump it in?

13 A. As -- no. I mean, there would
14 be, like, an estimate, you know, or -- you
15 know, pump this fast until hitting this
16 pressure. But, yeah, there would be
17 something like that in there.

18 Q. Okay. Did you see any -- any
19 of these parameters documented in any form
20 for the first well kill attempt that SoCalGas
21 performed before you arrived?

22 A. I don't -- I don't recall.

23 Q. You don't recall seeing any?

24 A. No.

25 Q. Did you ask anyone to provide

1 you with the parameters for any well kill
2 attempt that was undertaken before you
3 arrived?

4 A. I don't -- I don't recall, you
5 know, seeing the documents or... no, I don't.

6 Q. You didn't ask anyone to see
7 any documents either?

8 A. I don't -- yeah, I mean, you
9 know, we asked for, you know, any -- I guess
10 operations or anything, but I don't recall
11 any, you know, documents --

12 Q. Okay.

13 A. -- specifically.

14 Q. When you do -- strike that.

15 When you attempt well kills, do
16 you try to -- in the instance where the first
17 well kill doesn't work, do you try to learn
18 something from that to maybe refine or modify
19 your second or next well kill attempt?

20 A. Yes. I mean yes, you know,
21 that's what I do, and I do it on my well kill
22 attempts too.

23 Q. Okay. So if a well kill
24 attempt is unsuccessful, at worst, it's a
25 learning experience.

1 A. Uh-huh.

2 Q. Is that right?

3 A. Right.

4 Q. Okay. So you're learning
5 something hopefully from what didn't work so
6 maybe you can do something different that
7 will work on your next attempt. Is that
8 fair?

9 A. Uh-huh, yes.

10 Q. Okay. So it's important, when
11 you have a well kill attempt that's
12 unsuccessful, that you ascertain what the
13 exact parameters of that well kill attempt
14 were. Is that accurate?

15 MR. LOTTERMAN: Objection,
16 leading.

17 A. What's -- can you repeat the
18 question?

19 BY MR. KELLY:

20 Q. I'll rephrase it.

21 Do you consider it important
22 when you have a well kill attempt that is
23 unsuccessful that you ascertain what the
24 exact parameters, as best you can, of that
25 well attempt were so that you can hopefully

1 change or modify parameters for your next
2 well kill attempt?

3 A. Yes.

4 Q. Okay. And is it your testimony
5 that you did not, before attempting the first
6 Boots & Coots well attempt, ascertain what
7 the parameters were of any well kill attempt
8 previously performed by SoCalGas?

9 MR. HELSLEY: Objection, asked
10 and answered.

11 Go ahead, you can answer it.

12 A. Okay. Can you repeat the
13 question?

14 BY MR. KELLY:

15 Q. Sure. Subject to counsel's
16 objection.

17 Is it your testimony that you
18 did not, before attempting the first Boots &
19 Coots well kill attempt, ascertain the
20 parameters of any well kill attempt
21 previously attempted by SoCalGas?

22 A. Yes. I mean, you know, like I
23 said earlier, I wasn't -- you know, I
24 wasn't -- I wasn't there. You know, they
25 gave, you know -- I'm sorry, can you repeat

1 the question?

2 MR. KELLY: Sure. Could you
3 read it back, please.

4 (The reporter read back the
5 following portion of the preceding
6 record.)

7 "QUESTION: Sure. Subject to
8 counsel's objection.

9 Is it your testimony that you
10 did not, before attempting the first
11 Boots & Coots well kill attempt,
12 ascertain the parameters of any well
13 kill attempt previously attempted by
14 SoCalGas?"

15 (End of readback.)

16 A. Yeah. I mean, they -- you
17 know, they provided some documents, you know,
18 history, but I don't recall any information
19 right now about that.

20 BY MR. KELLY:

21 Q. About the well kill attempt?

22 A. Right.

23 Q. Okay. Would it have been
24 important before you planned your first
25 Boots & Coots well kill attempt to find and

1 review that information about the first SCG
2 well kill attempt?

3 MR. LOTTERMAN: Objection,
4 speculation.

5 THE WITNESS: Do I still answer
6 it?

7 MR. LOTTERMAN: You do.

8 A. I mean, it might have been
9 important, but, you know, something happened
10 between, you know -- you know, yeah. But, I
11 mean, it was different, so I don't know how
12 important -- you know, how much information
13 we would have got from it.

14 BY MR. KELLY:

15 Q. Well, wouldn't you have to know
16 what the parameters were and what information
17 was available before you can judge what you
18 might have learned from it?

19 MR. LOTTERMAN: Same objection.

20 A. Yeah. What's the question?

21 BY MR. KELLY:

22 Q. Wouldn't you have to know what
23 the parameters were and what information was
24 available before you can judge what you might
25 have learned from it?

1 MR. LOTTERMAN: Same objection.

2 A. Yeah. Yeah, I mean... yeah, I
3 mean -- yeah, I mean -- I guess I have to see
4 the information.

5 BY MR. KELLY:

6 Q. Before you know whether it
7 would have been helpful or not?

8 A. Right.

9 Q. Correct?

10 A. Yes.

11 Q. Okay.

12 MR. LOTTERMAN: Michael, to
13 avoid confusing Mr. Walzel, can we
14 agree that if I make an objection on
15 your question and it's re-read or
16 rephrased, that that objection is
17 carried forth?

18 MR. KELLY: Of course.

19 MR. LOTTERMAN: Thank you.

20 MR. KELLY: To the next
21 question. I usually try to --

22 MR. LOTTERMAN: I understand,
23 and I'm just trying to move this along
24 a little faster and I'm concerned that
25 my objections are breaking up the

1 flow.

2 MR. KELLY: They're confusing
3 me too.

4 MR. LOTTERMAN: I get it.

5 MR. KELLY: All right.

6 BY MR. KELLY:

7 Q. What would be the benefit of
8 reviewing the SS-25 drilling records?

9 A. Just to familiar -- familiarize
10 myself with the well.

11 Q. What information did you have
12 about what was happening with SS-25 when you
13 arrived on the site?

14 A. Well, visually I looked at it
15 and there was -- I mean, it looked like a
16 drilling -- you know, a location. There was
17 a pad around it and there was some cracks
18 with a little bit of gas coming out.

19 Q. A little bit of gas?

20 A. Well, I mean, not -- I couldn't
21 quantify it.

22 Q. Okay. Were there fissures in
23 the asphalt around the well?

24 A. Yes.

25 Q. Was gas coming out of them?

1 A. Yes.

2 Q. Did you also ascertain that gas
3 was coming out of some holes in the hillside
4 adjacent to the well site?

5 A. I don't recall the day -- I
6 don't recall seeing any gas coming out from
7 the side of the mountain when we got there
8 that day.

9 Q. Did someone tell you that that
10 was in fact occurring?

11 A. Yes.

12 Q. Did you identify that SS-25 was
13 experiencing an uncontrolled release of gas
14 into the atmosphere?

15 A. Was I advised on it?

16 Q. Did you ascertain that that was
17 in fact happening?

18 A. Yes.

19 Q. Okay. And would you consider
20 that a blowout?

21 A. Yes.

22 Q. Okay.

23 MR. HELSLEY: We've been going
24 for an hour. Is now a good time to
25 take a break?

1 MR. KELLY: Sure. Let's take a
2 break.

3 THE VIDEOGRAPHER: Off the
4 record, 10:08.

5 (Recess taken, 10:08 a.m. to
6 10:29 a.m.)

7 THE VIDEOGRAPHER: Stand by.
8 The time is 10:29, back on the record.

9 BY MR. KELLY:

10 Q. Mr. Walzel, I wanted to follow
11 up a little bit on the first kill attempt
12 performed by SoCalGas.

13 A. Okay.

14 Q. I've asked you some questions
15 and you've given me some answers about
16 information that you had or didn't have about
17 the first kill attempt. I just want to
18 confirm a few additional things.

19 Would it be accurate to state
20 that at the time you were planning the first
21 Boots & Coots well kill attempt that you did
22 not know what personnel performed the
23 SoCalGas first well kill attempt?

24 MR. LOTTERMAN: Objection,
25 leading.

1 A. Can I clarify that? Because I
2 was reading this description here, and we
3 did -- the e-mail described what the
4 operations -- because I said they talked
5 about the operation, but it said they
6 bullheaded water into the well, 8.6 brine,
7 then attempted to lube and bleed, and gas to
8 the surface. So I did receive that in the
9 initial blowout.

10 But that it was a bullhead
11 operation, not a kill like we were doing. So
12 that is information, it's just -- it's not --
13 it's a different type of kill, so...

14 BY MR. KELLY:

15 Q. Did that come to your attention
16 at the break we just took?

17 MR. HELSLEY: Objection, calls
18 for attorney-client privilege. But
19 other than that, go ahead.

20 A. Yes.

21 BY MR. KELLY:

22 Q. Okay. Thank you for that
23 clarification.

24 Now, my question was, would it
25 be accurate -- and let me read this question

1 back, subject to counsel's objection.

2 Would it be accurate to state
3 that at the time you were planning the first
4 Boots & Coots well kill attempt that you did
5 not know what personnel performed the
6 SoCalGas first well kill attempt?

7 A. What personnel, like names?

8 Q. Like who.

9 A. No. I don't know -- I don't
10 remember any names of people who were there
11 before I got there.

12 Q. Okay. Do you know -- strike
13 that.

14 When you were planning the
15 first Boots & Coots well kill attempt, did
16 you have any information as to whether the
17 well kill attempt performed previously by
18 SoCalGas involved both a kill attempt pumping
19 fluid down the tubing and a kill attempt
20 pumping fluid down the casing?

21 A. It doesn't specify here.
22 Attempt to bullhead kill, 8.6 brine... but
23 typically a bullhead would be down, you know,
24 tubing or casing.

25 Q. Okay. Is it fair to say that

1 at the time you were planning the first
2 Boots & Coots well kill attempt, you didn't
3 have any information as to whether the
4 SoCalGas well kill attempt involved two
5 separate kill attempts, one with injection
6 down the tubing and one with injection down
7 the casing?

8 MR. LOTTERMAN: Objection,
9 leading.

10 A. I'm sure that was discussed,
11 and -- I mean, if you're -- yeah, I mean, if
12 you're bullheading a well, you're going to
13 pump -- you know, you're not circulating so
14 you're pumping down -- you've got to pump
15 down each to kill it.

16 BY MR. KELLY:

17 Q. Okay. So your best
18 recollection is that the well kill attempt by
19 SoCalGas involved both the pumping of kill
20 fluid down the tubing and also down the
21 casing. Is that accurate?

22 A. My best recollection.

23 Q. Okay. Did you learn at some
24 point in time that the SoCalGas first well
25 kill attempt created an ice plug or hydrate

1 in the tubing?

2 A. No. I mean, I wasn't -- that
3 wasn't information when I first got there.

4 Q. Okay. At some point in time,
5 did you learn that there was a hydrate or ice
6 plug in the well tubing?

7 A. Yes. I don't remember when,
8 but yes, there was an ice plug in the tubing.

9 Q. Okay. When did you learn that?

10 A. I don't remember the date or --
11 but it would have been either when we started
12 to pump on -- down the tubing or run the
13 tools in the tubing.

14 Q. Okay. By "we," you mean
15 Boots & Coots?

16 A. Yeah, Boots & Coots, you know.
17 Yes.

18 Q. Okay. Are you --

19 A. We didn't do the pumping, you
20 know. Halliburton did the pumping, but it
21 was found through trying to do an operation
22 of some sort.

23 Q. Okay. What do you mean, "we
24 didn't do the pumping, Halliburton did"?

25 A. Well, Halliburton -- Boots &

1 Coots doesn't have pump trucks. But, yes,
2 when Boots & Coots was attempting to pump on
3 the well.

4 Q. What is Boots & Coots'
5 relationship to Halliburton?

6 A. Right. Halliburton --
7 Halliburton owns us.

8 Q. Okay. When you say --

9 MR. HELSLEY: Let him finish.

10 BY MR. KELLY:

11 Q. When you say Boots & Coots
12 didn't have pumping equipment, what does that
13 mean?

14 A. Like there's not a pump truck
15 with the name Boots & Coots on it. I was
16 just -- you know, I just wanted to clarify
17 that Halliburton owns us and it was, you
18 know -- but yes, it was a direct -- you know,
19 it would have been a pumping operation as
20 part of our kill.

21 Q. Okay. Is it your testimony
22 that Boots & Coots discovered there was a
23 hydrate or ice plug present at the time that
24 they attempted their first well kill?

25 A. You know, like I said, I don't

1 record -- I mean, if it's -- I'd have to look
2 at the daily reports, but, I mean, it's
3 likely it happened, and I don't recall
4 exactly right now. I'd have to refresh
5 myself.

6 Q. Okay. When was that in your --
7 strike that.

8 In your opinion, when was the
9 hydrate or ice plug formed?

10 MR. LOTTERMAN: Objection,
11 foundation, speculation.

12 A. I mean, all I can say is before
13 we tried to pump on it or run tools, you
14 know, whatever -- whenever we found it, it
15 had happened sometime before that.

16 BY MR. KELLY:

17 Q. Okay. Is it your testimony
18 that the hydrate or ice plug was formed
19 before Boots & Coots did anything to SS-25?

20 A. Like I said, I'd have to look
21 through the -- I'd have to go through the
22 reports to find out when, but -- I already
23 forgot your question.

24 Q. Okay. Is it your testimony
25 that the hydrate or ice plug was formed

1 before Boots & Coots did anything to SS-25?

2 MR. LOTTERMAN: Objection,
3 speculation, foundation.

4 A. Yes. I mean, like I said, I
5 don't remember the exact day or what
6 operation it was, but if it was before we did
7 our first one, then it would have had to have
8 been there before we did it, you know, before
9 the first pump operation, if that's when
10 it -- or before our first, if we had
11 discovered it then.

12 BY MR. KELLY:

13 Q. Okay. And is that what
14 happened?

15 MR. LOTTERMAN: Same
16 objections.

17 A. Like I said, I don't recall
18 when that was.

19 BY MR. KELLY:

20 Q. Okay. Let me give you
21 Exhibit 242-1, which is a collection of the
22 work orders by Boots & Coots.

23 A. Okay.

24 Q. And see if you can find any
25 information in there which will help us

1 answer the question as to when the hydrate
2 was discovered and when it, in your opinion,
3 was formed.

4 (Document review by witness.)

5 (Sotto voce discussion.)

6 A. It looks like we weren't able
7 to pump into it on October 28th, down the
8 tubing.

9 BY MR. KELLY:

10 Q. October 28, 2015?

11 A. Yes. I just have to go through
12 here and make sure, see when.

13 (Document review by witness.)

14 A. Yes. I mean, it says here on
15 the 28th, we tried to pump on it and ran it
16 with the bailer and tagged. And so, yes,
17 there was an obstruction in the tubing at
18 that time.

19 BY MR. KELLY:

20 Q. On October 28, 2015?

21 A. Yes, sir.

22 Q. Okay. Do you understand that
23 you have been designated by Halliburton and
24 Boots & Coots as the person most qualified to
25 answer questions --

1 A. Yes, I was told that.

2 Q. -- regarding well kills
3 performed by Boots & Coots and Halliburton,
4 up to but not including the last well kill,
5 which occurred on December 22nd, 2015?

6 A. Yes.

7 Q. Okay. And are you comfortable
8 doing that, being that person?

9 A. Yes.

10 Q. Okay. And you were there for
11 all of the Halliburton Boots & Coots
12 attempted well kills up to but not including
13 the last one, which occurred on
14 December 22nd, 2015?

15 A. Yes.

16 Q. Okay. Were any of those well
17 kills successful?

18 MR. HELSLEY: Objection, vague.

19 Go ahead.

20 BY MR. KELLY:

21 Q. Do you understand that
22 question?

23 A. I do. Yes. I mean, none of
24 the -- none of the -- you know, the -- didn't
25 stop the flow of gas.

1 Q. Okay. Well, isn't that what a
2 well kill is designed to do?

3 A. Right. They were -- you know,
4 each one, we did gain information on the
5 well.

6 Q. Okay. But the point of a well
7 kill --

8 A. Right.

9 Q. -- is to stop the uncontrolled
10 flow of gas out of the well, correct?

11 A. Correct.

12 Q. And so even though you may have
13 gained some information about well kills
14 performed by Halliburton, up to but not
15 including the final attempt on December 22nd,
16 none of those well kills were successful,
17 were they?

18 MR. HELSLEY: Vague.

19 A. The gas continued to flow.

20 BY MR. KELLY:

21 Q. Okay. Can I just ask you to --

22 A. Oh, sorry.

23 Q. -- to put your hand down?

24 That's okay. It may affect the video.

25 A. Okay.

1 Q. Okay. Thank you.

2 You don't have to sit up
3 straight if you don't want to, but just don't
4 put your --

5 A. I'll try to find an in between.
6 I'm leaning over.

7 (Laughter.)

8 BY MR. KELLY:

9 Q. I'm not trying to correct your
10 posture; I'm just saying if you put your hand
11 in front of your mouth, it makes the video a
12 little difficult to comprehend. Because
13 we'll all be slouching before the day is
14 over, guaranteed. Thank you.

15 So the hydrate was discovered
16 by Boots & Coots on October 28, 2015. Is
17 that what you testified to?

18 A. Right. Well, from the report,
19 we couldn't -- it looked like we couldn't
20 pump into it and we ran and tagged, but I
21 don't think at the time we had identified it
22 as a hydrate.

23 Q. Okay. Just as blockage at that
24 point?

25 A. Right.

1 Q. Okay. And was that -- was
2 October 28, was that a well kill attempt?

3 A. I'm -- yes. I mean, it looked
4 like we were getting lined up to pump down
5 the tubing, so... yes. I would say that's
6 probably what we were doing. I can read it.
7 Yes, I'd say so.

8 Q. Okay. So the first well kill
9 attempt by Boots & Coots and Halliburton was
10 on October 28, 2015.

11 A. It appears so.

12 Q. Okay. And was that when you
13 discovered there was some blockage in the
14 tubing?

15 A. Yes.

16 Q. When was that blocking
17 identified as an ice plug or hydrate?

18 (Document review by witness.)

19 A. It looks like the coiled tubing
20 went in on November 6th.

21 BY MR. KELLY:

22 Q. Is the coiled tubing what was
23 used to remove the hydrate or ice plug from
24 the tubing?

25 A. Yes.

1 Q. Okay. Where did the coiled
2 tubing come from?

3 A. I believe somewhere in
4 Louisiana, if I remember.

5 Q. Okay. Was that owned by
6 Halliburton?

7 A. Yes, it was a Halliburton
8 coiled tubing unit.

9 Q. Okay. Were there no other
10 coiled tubing units available, like on the
11 West Coast?

12 A. We searched and that was the
13 closest one to it.

14 Q. Okay. So sometime between
15 October 28th and November 6th of 2015, you
16 identified the blockage in the tubing as an
17 ice plug or hydrate. Is that correct?

18 A. Right. I mean, it would have
19 been -- I don't have anything in here like
20 received ice chunks out or anything.

21 Q. Okay. And then on November 6,
22 the coiled tubing showed up?

23 A. No. It showed up...

24 (Document review by witness.)

25 A. I'd say I met with the coiled

1 tubing supervisor on November 1st, so on or
2 around November 1st.

3 BY MR. KELLY:

4 Q. Okay. When was the hydrate or
5 ice plug actually removed?

6 A. On November 6th.

7 Q. Okay. So when was the first
8 Boots & Coots well kill attempt performed?

9 A. After the 6th.

10 Q. Can you tell me when?

11 A. Hmm.

12 (Document review by witness.)

13 A. Can I write --

14 BY MR. KELLY:

15 Q. Oop --

16 A. No? I mean, I'm not going to
17 write on this (demonstrating), but --

18 Q. If you want to make a --

19 A. Just if I can write a date, go
20 back, just a number.

21 Q. We'll get you a piece of paper
22 to write on, but don't --

23 MR. HELSLEY: What are you
24 trying to do?

25 THE WITNESS: The 6th is when

1 the coil -- I was trying to find a
2 date, because then it looked like we
3 did do coil...

4 BY MR. KELLY:

5 Q. Do you want a piece of paper to
6 write on, is that --

7 A. If you don't mind, just so I
8 can go back to the, you know, page number or
9 something.

10 MR. HELSLEY: What are you
11 trying to do, Danny? What are you
12 going to write?

13 THE WITNESS: Just 5.

14 MR. HELSLEY: I'm sorry?

15 THE WITNESS: Just the
16 number 5.

17 MR. HELSLEY: You can do that.

18 THE WITNESS: Or, I'm sorry, 8.

19 A. Okay. Here it says -- I'm
20 sorry, did I tell you the 6th?

21 BY MR. KELLY:

22 Q. You said that the coiled
23 tubing --

24 A. Yeah.

25 Q. -- was operational as of the

1 6th, I believe is what you said.

2 A. Right. So I did put in my
3 notes "Found bottom of hydrate plug" at
4 whatever feet.

5 MR. LOTTERMAN: What date?

6 THE WITNESS: November -- I'm
7 sorry. November 6th.

8 MR. LOTTERMAN: Thank you.

9 BY MR. KELLY:

10 Q. So, then, the date we're
11 looking for is when the first Boots & Coots
12 well kill attempt was actually performed.

13 A. Yes. Then we ran some logs.

14 (Document review by witness.)

15 A. November -- we pumped on
16 November 13th.

17 BY MR. KELLY:

18 Q. November 13?

19 A. Yes. If I read -- if I didn't
20 miss something.

21 Q. So that was the first Boots &
22 Coots well attempt -- well kill attempt?

23 A. Yes. There was some pumping
24 while we did the coil, but -- but yes. I'd
25 say the 13th.

1 Q. Okay. And so the originally
2 planned first well kill attempt by Boots &
3 Coots was to take place on October 28th,
4 correct?

5 MR. LOTTERMAN: Objection,
6 leading.

7 A. I mean, we planned -- yes. We
8 planned to pump on it -- looked like we were
9 lining up to pump on it on the 28th, yes.

10 BY MR. KELLY:

11 Q. Okay. And that's when you
12 discovered the blockage.

13 A. Correct.

14 Q. And then you got the coiled
15 tubing unit out to California.

16 A. Yes.

17 Q. And then you cleared the
18 blockage, the hydrate or ice plug, right?

19 A. Yes.

20 Q. And then you actually performed
21 the first well kill on November 13th.

22 A. Yes. Unless I missed something
23 there.

24 Q. Okay. Well, take your time.

25 A. Yes, okay. 13th.

1 Q. And there's 31 days in October
2 because, as my colleague reminded me, that's
3 when Halloween is, right?

4 A. (Demonstrating). Yes, 31.

5 Q. Okay. We agree on that?

6 A. (Nods head.)

7 Q. And then 13 days. So the first
8 well kill attempt by Boots & Coots was
9 delayed 16 days because of the presence of
10 the blockage; that is, the hydrate or ice
11 plug.

12 MR. LOTTERMAN: Objection,
13 leading.

14 A. We ran some -- in between, we
15 ran some -- tried to run some diagnostic
16 logs.

17 BY MR. KELLY:

18 Q. Okay. I'm just talking about
19 well kill attempts.

20 A. Let me go back and read the
21 28th.

22 Q. Okay.
23 (Document review by witness.)

24 A. I just want to clarify, because
25 I don't know if we were lining up to kill it

1 or just pressuring the valves up to equalize
2 them.

3 (Document review by witness.)

4 A. Well, from the notes, it looks
5 like we were trying to run logs and we
6 couldn't -- or tools in the hole and
7 couldn't, so I can't say that the 28th was
8 the day we were going to kill it. It's just
9 we were -- because the projected operations,
10 rig down A-frame, move in crane, run in the
11 hole with additional weight bars --

12 (Interruption by the
13 stenographer.)

14 A. Okay. Basically, I can't say
15 the 28th was the day we were -- from this, I
16 can't determine if we were going to kill it,
17 because our projected operations were -- see
18 if we could even get down with tools in the
19 well at that time.

20 BY MR. KELLY:

21 Q. Okay. You could not have
22 attempted a well kill until the hydrate or
23 ice plug was removed. Is that accurate?

24 A. Yes, that's accurate.

25 Q. Okay. So in any event, the

1 hydrate would have prevented any well kill
2 attempt until November 13, 2015?

3 MR. LOTTERMAN: Objection,
4 leading.

5 BY MR. KELLY:

6 Q. Let me rephrase the question.

7 A. Yeah.

8 Q. You had to get the hydrate, the
9 ice plug, out of the well before you could
10 try to kill it, right?

11 A. Yes. And then there was some
12 other things we were wanting to get done
13 before the kill, like running these
14 diagnostic tools.

15 Q. Okay. But back to my question,
16 you had to get the hydrate or plug out of the
17 well before you could try to kill it, right?

18 A. So I would say November 6th, we
19 continued with our plan at the time.

20 MR. HELSLEY: And you're doing
21 an excellent job, but just try to
22 listen to his question and just focus
23 on his question and just try to answer
24 his question.

25 THE WITNESS: Okay.

1 MR. HELSLEY: You can go ahead
2 and ask that again if you want.

3 MR. KELLY: Sure.

4 BY MR. KELLY:

5 Q. You had to get the blockage,
6 the hydrate, the ice plug, you had to get
7 that out of the tubing before you could
8 attempt a well kill --

9 A. Yes.

10 Q. -- right? Right?

11 A. Right.

12 Q. Okay.

13 A. Do I answer yes or --

14 Q. Yes or right is fine. That's
15 good. Either one, both.

16 A. Okay.

17 Q. And you started -- you got the
18 equipment and started removing the ice plug
19 on November 6th, correct?

20 A. Correct. That's how I entered
21 that.

22 Q. And then you were able to do
23 the first well kill attempt on November 13th,
24 2015, correct?

25 A. That's when we pumped, yes.

1 Q. Okay. And was that your first
2 attempt at a well kill?

3 A. The best I can recall when
4 reading the notes.

5 Q. Okay. And was that well kill
6 successful?

7 MR. HELSLEY: Object. Let me
8 make an objection, vague.

9 Go ahead.

10 A. Oh. The gas still flowed after
11 we pumped.

12 BY MR. KELLY:

13 Q. Is your answer then that it was
14 not successful?

15 A. Yes.

16 Q. Okay. If it was successful,
17 then the gas would have stopped flowing,
18 right?

19 A. Correct.

20 Q. Okay. So how is it that you
21 went about planning your subsequent well kill
22 attempts?

23 A. What day did I say, the 13th?

24 Q. Yes, sir.

25 A. Okay. So after the first one,

1 yeah, so I wrote that the gas -- the -- after
2 we pumped our kill job, the well -- from what
3 I remember, the gas coming out of the ground
4 increased, and after we did our job, the gas
5 stopped, and -- for, you know, a brief time,
6 so that told -- you know, and then it started
7 flowing again. So at the time that -- you
8 know, the well stayed static for a little
9 while and then -- and you're asking what we
10 did for the next one?

11 Q. My question is just generally,
12 how did you plan subsequent well kill
13 attempts?

14 A. Right. I believe we planned to
15 try to increase the pump rate on the next
16 one.

17 Q. Okay. Did you generally use
18 the same -- the same type, that is, weight
19 and consistency of kill fluids in the
20 subsequent kill attempts?

21 A. Generally they were similar.

22 Q. Okay. So you used a similar
23 weight and consistency of kill fluid in
24 the --

25 A. Yes.

1 Q. -- subsequent kill attempts?

2 MR. LOTTERMAN: Objection,

3 vague.

4 BY MR. KELLY:

5 Q. And by "subsequent kill
6 attempts," you understand I mean up to but
7 not including the kill attempt on
8 December 22nd, right?

9 A. Let me find the next kill
10 attempt.

11 (Document review by witness.)

12 A. The fluid was -- looked like
13 the same weight, but we pumped at a faster
14 rate.

15 BY MR. KELLY:

16 Q. Okay. For the next one?

17 A. I believe so.

18 Q. Okay. Did you -- and by "you,"
19 I mean Danny Walzel -- perform any detailed
20 transient modeling before any of the kill
21 attempts that you participated in?

22 A. Yes.

23 Q. When did you do that?

24 A. I don't remember the exact one,
25 but somewhere probably after the second one.

1 Q. Where would we find that
2 detailed transient modeling?

3 A. I don't have it anymore.

4 Q. Where did it go?

5 A. With -- it got -- when I got
6 back from that job, my computer got stolen
7 out of my truck.

8 Q. And your detailed transient
9 model was in your computer?

10 A. Yes.

11 Q. Who stole the computer, do you
12 know?

13 A. I didn't get his name.

14 Q. Didn't catch him?

15 A. No.

16 Q. Was your computer ever
17 recovered?

18 A. No.

19 Q. Was your computer backed up
20 anywhere?

21 A. I believe I would have
22 backed -- you know, saved files on an
23 external, but it -- at the time I hadn't
24 backed it up on anything else and it would
25 have been stolen too.

1 Q. The external hard drive was
2 stolen also?

3 A. Well, you know, a little
4 (demonstrating) -- yes, external. My whole
5 computer bag. Passports, everything.

6 Q. Okay. And whoever stole your
7 computer bag stole the computer that had the
8 detailed transient model on it and they also
9 stole the hard drive, external hard drive,
10 which had a copy of the detailed transient
11 modeling on it?

12 A. Yes. Everything. And there's
13 a police -- you know, police report and
14 everything.

15 Q. Did you determine a flow rate
16 before your second well kill attempt?

17 A. A flow rate coming out of the
18 well with gas or a flow rate as far as
19 pumping?

20 Q. A flow rate as far as gas
21 coming out of the well as part of your
22 detailed transient model, which was stolen.

23 A. So the -- I didn't have the
24 exact number of gas. My model was a model of
25 the well, and then I did it at increasing gas

1 flow rates.

2 Q. What do you mean, "increasing
3 gas flow rates"?

4 A. So I said, okay, if it's making
5 10 million cubic feet of gas a day, then I
6 increased it to 20, 30, 40, 50.

7 Q. Were those just guesses?

8 A. It was testing the model
9 against different flow rates.

10 Q. Well, how did you come up with
11 different flow rates?

12 A. I used 10,000, 20, 30, 40, and
13 just increased it.

14 Q. And so my question is, were
15 those just numbers you pulled out of the air
16 or where did you get them?

17 A. I mean -- yes. I mean, I just
18 used those numbers in the model at varying
19 gas rates.

20 Q. Were you ever able to get an
21 actual flow rate of the gas coming from the
22 well to use in your modeling?

23 A. We were never able to measure
24 the gas flow rate coming out of the well.

25 Q. Okay. At any time?

1 A. At any time.

2 Q. And so you were never able to
3 include that variable in your modeling?

4 A. No.

5 Q. You were not?

6 A. We weren't able to ever measure
7 the gas flow rate. It's difficult when it's
8 coming out of the ground like that.

9 Q. Did you ever accurately model
10 the gas flow rate?

11 A. What do you mean by
12 "accurately"?

13 Q. Within a reasonable degree of
14 engineering certainty.

15 MR. LOTTERMAN: Objection,
16 vague.

17 A. Are you asking for an exact
18 number of gas -- how much gas is coming out
19 of the well?

20 BY MR. KELLY:

21 Q. An accurate number.

22 A. You know, I was able to, in my
23 model or in the model I recall, you know,
24 with the weight and the pump -- at pump
25 rates, we'd be able to kill a certain amount

1 of gas rate.

2 Q. Okay. My question was: Were
3 you ever able to accurately model the gas
4 flow rate?

5 A. No.

6 Q. Is it -- did you make changes
7 to anything other than the volumes when you
8 planned subsequent kill attempts after your
9 first kill attempt?

10 A. As I recall, earlier I said we
11 tried to pump faster.

12 Q. Okay. Was the weight and
13 consistency of the pumping fluid that you
14 used the same or nearly the same throughout
15 all of your kill attempts?

16 A. I'd have to read through here
17 to refresh my memory on what the weight was
18 on 3, 4, 5.

19 Q. Can I ask you to refer to
20 page 141 in your testimony before the PUC,
21 please, sir?

22 A. Uh-huh. 141?

23 Q. Yes, sir.

24 A. Okay.

25 Q. If you could just read the

1 testimony starting with the question on line
2 10 down to the bottom of the page.

3 A. 10 all the way down to the
4 bottom of the page?

5 Q. Yes, sir.

6 A. Okay. "Washed out the ice
7 plug, but, no" --

8 Q. You don't have to read it out
9 loud. Just read it to yourself.

10 A. Oh, I thought that's what you
11 said.

12 Q. No. I'm sorry. I apologize.
13 I was inaccurate or unclear.

14 (Document review by witness.)

15 A. Okay.

16 BY MR. KELLY:

17 Q. Does that refresh your
18 recollection that --

19 A. Oh, I'm sorry, I was on the
20 wrong page.

21 Q. Oh. 141.

22 A. Right.

23 Q. All right.

24 (Document review by witness.)

25 A. Yes.

1 BY MR. KELLY:

2 Q. Does that refresh your
3 recollection that the methodology that you
4 used for the well kill procedures remained
5 basically unchanged throughout the series of
6 well kills Boots & Coats attempted?

7 MR. LOTTERMAN: Objection,
8 foundation, speculation.

9 A. Yes.

10 BY MR. KELLY:

11 Q. Okay. Does that refresh --
12 does that testimony refresh your recollection
13 that the only thing that you were changing
14 during the different well kill attempts was
15 the volume?

16 A. From -- well, like I said
17 earlier, we changed the pump rates as well.

18 Q. Okay. Volume and pump rates?

19 A. Best as I can remember.

20 Q. Your answer is yes?

21 A. Yes, best I can remember.

22 Q. Okay. When you were designing
23 the kill attempts, did you consider the loss
24 of fluid to the permeable reservoir?

25 A. When you say plan for, what do

1 you mean by plan for?

2 Q. Did you put in values for loss
3 of fluid to the permeable reservoir?

4 A. I didn't put a value number in.
5 It would have been hard to determine a number
6 you lose.

7 Q. Okay. Is your answer then that
8 you didn't plan for that in your calculations
9 or modeling?

10 A. No. I'd say it's accurate to
11 say the barite -- part of the barite pill was
12 when the barite fall out to plug the bottom
13 of the well and stop any losses. So I'd say
14 that was a planned-for.

15 Q. For the barite to fall out to
16 plug the bottom of the well, wouldn't the gas
17 have to settle?

18 A. Gas doesn't settle. I mean,
19 it -- I mean, it always comes out to the top.

20 Or what do you mean by gas
21 settle?

22 Q. When you were planning kill
23 attempts, did you have morning meetings to do
24 that?

25 A. We had -- yes.

1 Q. And at the morning meetings,
2 would you meet in the trailer and talk about
3 what you would like to do and come up with a
4 formula and then just go do your pump job?

5 A. No. I mean, the plan wasn't --
6 come up with at the morning meeting and then
7 we go out and do it.

8 Q. It wasn't that?

9 A. I mean, it was discussed in
10 other places besides just the morning
11 meeting.

12 Q. Okay. Could you turn to
13 page 40 of your testimony before the PUC,
14 please.

15 A. Page 40?

16 Q. Yes, sir.

17 A. Okay.

18 Q. Down at the bottom of the page
19 starting at line 21, witness Walzel
20 testified -- and again, this is testimony
21 under oath -- "Yes. I mean, I was --
22 typically, I would be, like, present at the
23 morning meeting and, you know, like I said,
24 our team was in the meetings. You know, I
25 mean, it was kind of, you know, meet in the

1 trailer, talk about what we would like to do,
2 and come up with a formula and go out and do
3 our pump job," end of quote.

4 Is that the testimony you gave
5 under oath before the PUC?

6 A. Yes, it is.

7 Q. Was that testimony accurate
8 when you gave it?

9 A. The best of my recollection.

10 Q. Okay.

11 (Discussion off the
12 stenographic record.)

13 BY MR. KELLY:

14 Q. When you did perform each of
15 the subsequent well kill attempts, was there
16 a deterioration of the condition of the well
17 and its surroundings?

18 A. I don't remember if it was
19 after the first one we did or the second one,
20 but the fissures -- I mean, it got bigger,
21 but as we pumped, the area around the well
22 eroded.

23 Q. Okay. Could you describe for
24 the jury what you mean by that?

25 A. So there was a hole in the

1 ground around the well.

2 Q. Okay. A hole in the earth?

3 A. Earth. Ground, earth.

4 Q. And how did that occur?

5 A. So when we showed up, the gas
6 was going through the earth and coming out in
7 various places. And then as you pumped, the
8 fluids and everything that were exiting the
9 well eroded, coming up to surface.

10 So instead of everything coming
11 up all over the place, everything was coming
12 up right around the well.

13 Q. Adjacent to the well pipe?

14 A. All the way around it, you know
15 (demonstrating). Adjacent, yeah.

16 Q. And did that create some type
17 of erosion away of the soil there?

18 A. Yes.

19 Q. Yes?

20 A. (Nods head.)

21 Q. And did that have the effect of
22 destabilizing the wellhead?

23 A. Yes.

24 Q. And what happened in that
25 regard?

1 A. Well, there was no longer any
2 earth around the well, so when we pumped or
3 there was fluid in there or -- anyway, just
4 the wellhead was unsupported and it would
5 move (demonstrating).

6 Q. It became unstable?

7 A. Yes.

8 Q. And what did you do -- when I
9 use the term "you," I mean you, the group --
10 what did the group do to stabilize or
11 restabilize the wellhead?

12 A. Well, actually, I went and
13 helped put cables around the well to
14 stabilize it.

15 Q. Okay. Like guy-wires --

16 A. Right.

17 Q. -- to the wellhead?

18 A. Correct, yes.

19 Q. Okay. To keep it from swaying?

20 A. Yes.

21 Q. And you assisted in doing that?

22 A. Yes. Yeah, any work that was
23 done hands-on on the well, you know, that was
24 a big part of me and James out there. We
25 were actually working hands-on the well.

1 Q. You were helping him.

2 A. Okay.

3 Q. How big did the crater become?

4 A. I don't recall the number.

5 (Sotto voce discussion.)

6 BY MR. KELLY:

7 Q. Did the crater around the
8 wellhead eventually reach dimensions of about
9 40 feet deep, 60 feet wide, and 90 feet long,
10 to your recollection?

11 MR. LOTTERMAN: Objection,
12 leading.

13 A. Like I said, I don't remember a
14 number.

15 BY MR. KELLY:

16 Q. Those are the figures that
17 Mr. LaGrone gave us yesterday --

18 A. Okay.

19 Q. -- for the dimensions of the
20 crater.

21 MR. LOTTERMAN: Objection,
22 speech.

23 A. Are you waiting on my answer?

24 BY MR. KELLY:

25 Q. No, I was waiting to see if

1 anything else was going to come from across
2 the table before I finished my question.

3 Let me just start over, subject
4 to counsel's objection. Those are the
5 figures that Mr. LaGrone gave us yesterday
6 for the dimensions of the crater.

7 A. Okay.

8 Q. Do you agree or disagree with
9 those?

10 MR. HELSLEY: Asked and
11 answered, but go ahead.

12 A. I don't recall a number. If --
13 I mean, I'd have to agree with Jim if he says
14 it.

15 BY MR. KELLY:

16 Q. Okay. Does that sound about
17 right to you?

18 A. I'll tell you, it would be, you
19 know, an estimate of it, yes.

20 Q. It was a big crater, wasn't it?

21 A. I mean, I've seen bigger.

22 Q. Okay. Still pretty big,
23 though, right?

24 A. Like I said, I've seen bigger.
25 I guess it depends on how you say -- what you

1 call big is.

2 Q. Okay. Were you required to
3 build a bridge across the crater at one point
4 to allow personnel to access the wellhead?

5 A. The bridge was being built, I
6 believe, as I was -- as I was ending my
7 trip -- you know, the -- it was being built,
8 yes.

9 Q. As you were shipping out?

10 A. Yeah.

11 Q. Okay. Did they have to suspend
12 attempted kill operations while the bridge
13 was being built?

14 A. I wouldn't have been there for
15 that, but the way me and James were going out
16 and tying on the well was on a manlift.

17 Q. On a what?

18 A. A manlift.

19 Q. Oh, a hydraulic lift?

20 A. It would have been hydraulic,
21 yeah.

22 Q. Like a little pod on a boom?

23 A. Right, yeah.

24 Q. Okay. Did you have any type of
25 special protective gear when you were out in

1 that manlift?

2 A. I mean, I had on a hard hat,
3 safety glasses, coveralls and boots.

4 Q. Were you tethered by a cable to
5 anything else?

6 A. I don't believe I -- I mean a
7 lot of times we don't tether off just in case
8 we have to leave in an emergency.

9 Q. Okay.

10 A. I don't know if I was, you
11 know, at that time or not.

12 MR. KELLY: Okay. We've been
13 going an hour. Why don't we take a
14 short break.

15 THE VIDEOGRAPHER: Off the
16 record, 11:31.

17 (Recess taken, 11:31 a.m. to
18 11:48 a.m.)

19 (Ms. Bolton is no longer
20 present.)

21 THE VIDEOGRAPHER: Stand by.
22 The time is 11:48. Back on the
23 record, beginning of File 2.

24 BY MR. KELLY:

25 Q. Mr. Walzel, during the multiple

1 well kill attempts performed by Boots & Coots
2 at SS-25, was there an ejection of well kill
3 fluids and well kill substances up outside
4 the production casing such that it sprayed up
5 into the air?

6 A. Yes.

7 Q. How many well kill attempts did
8 that happen on?

9 A. I mean, every time we pumped on
10 it, fluid came out.

11 Q. Okay. And when the fluid came
12 up, was it consistent in the way it came up
13 or were there different versions of that?

14 A. Well, like the first time, it
15 stopped, I mean, and then started again. I
16 mean, I'd say after the -- after the hole
17 formed, I'd say it was similar. Maybe -- I
18 don't remember exactly.

19 Q. Was the well kill fluid that
20 was coming back up, was it coming up through
21 the casing or was it coming up outside of the
22 casing?

23 MR. LOTTERMAN: Objection,
24 speculation, foundation.

25 A. It was coming up out -- I mean,

1 out of the hole in the ground.

2 BY MR. KELLY:

3 Q. Okay. So outside the
4 production casing?

5 MR. LOTTERMAN: Objection,
6 leading, foundation, speculation.

7 A. Out -- yeah, outside the -- I
8 mean, it was coming out of the ground, so...

9 BY MR. KELLY:

10 Q. Okay. Where was it coming out
11 of the ground?

12 A. I couldn't -- I mean, I
13 can't -- I couldn't see other than it was
14 coming out of the ground.

15 Q. Okay. Was it spraying into the
16 air?

17 A. The -- what?

18 Q. The fluids coming back out of
19 the --

20 A. I mean, it would get above
21 ground level at times while we were pumping
22 (indicating).

23 Q. Okay. You're indicating maybe
24 three feet, four feet?

25 A. Just (demonstrating) this is

1 the ground and coming up above it.

2 Q. Did you ever see the well kill
3 fluids spray 75 to 80 feet into the air?

4 A. I wouldn't -- I don't know how
5 high it went. I didn't measure it.

6 Q. Okay. Well, just a minute ago
7 you were indicating three or four feet.

8 A. No, I was just indicating above
9 the ground (demonstrating).

10 Q. Oh. So that wasn't intended to
11 be from the floor?

12 A. It wasn't a measurement, no.

13 Q. Okay. So it was spraying up
14 into the air?

15 A. Yes.

16 Q. Appreciably?

17 A. It was spraying up in the air.

18 Q. Okay. Was it going -- can you
19 estimate at all how high it was going?

20 A. I don't -- I didn't estimate.
21 You know, I wouldn't know. We were -- I
22 mean, it was coming out above the ground
23 level because it was -- you know, we
24 collected it on location there when it came
25 out of the crater.

1 Q. Okay. Did you ever observe the
2 spray that was coming up out of the well area
3 during a kill attempt to form an oily mist in
4 the area?

5 A. I observed an oily mist, yes.

6 Q. Okay. Could you describe that
7 for us, please?

8 A. From what -- I mean, I recall
9 it was just a fine, oily mist. I mean,
10 not -- you know, it's just a -- small
11 droplets of water -- or oil.

12 Q. Did it get on your clothing?

13 A. Yes.

14 Q. Did you see it accumulate to
15 the extent that it could drift away from the
16 well site?

17 A. You mean in the air?

18 Q. Yes, sir.

19 A. I mean, I recall it, you know,
20 coming out and just lightly, you know,
21 covering the ground around the well site.

22 Q. Okay. Did you have an opinion
23 as to why the kill fluids were being ejected
24 back out of the well after they were pumped
25 in?

1 A. Do I have an opinion why?

2 Q. Yes, sir.

3 A. Well, because the gas was
4 coming -- I mean, when you pump -- we were
5 pumping down the tubing and up the annulus
6 so, you know, the mud was coming. But just
7 the flow from the well was bringing it to the
8 surface.

9 Q. Okay. So you were pumping down
10 the tube?

11 A. Correct.

12 Q. On any of the well kill
13 attempts, did you pump down the casing?

14 A. No. Not during the well kill
15 attempts, no.

16 Q. Okay. Always down the tube?

17 A. Always down the tubing.

18 Q. At some point in time, was a
19 plug inserted in the tubing?

20 A. Yes.

21 Q. What did you call that plug?

22 A. I believe it was -- well, I
23 read it just in here, but it was an EZSV
24 tubing plug.

25 Q. And for what purpose was the

1 plug put in the tubing?

2 A. The plug was put in there to
3 test the integrity of the tubing, and if the
4 decision was made later to cut the tubing,
5 below the cut would be isolated.

6 Q. After the plug was put in, did
7 you test the integrity of the tubing?

8 A. There was a negative test done,
9 yes.

10 Q. What's a negative test?

11 A. So there was -- we -- what it
12 means is we bled the tubing pressure off and
13 observed for any leaks, which would have been
14 indicated by an increase in pressure on the
15 tubing.

16 Q. Okay. And did you find any
17 leaks?

18 A. It didn't appear there was any
19 leaks in the tubing.

20 Q. Okay. So then did you take the
21 plug out?

22 A. No.

23 Q. Why not?

24 A. Well, like I said, we put it
25 there to test the tubing, and then if the

1 tubing was ever to be cut, it would have
2 been -- it would have isolated below where we
3 would have cut the tubing.

4 Q. What would have isolated below
5 that?

6 A. The plug.

7 Q. What do you mean by that?

8 A. Or the cut would have been
9 above the plug, but it would have isolated
10 the tubing below.

11 Q. Why would you want the tubing
12 below a cut isolated?

13 A. I mean, it's best practice if
14 you ever cut tubing to set plugs below your
15 cut.

16 Q. Why?

17 A. To keep reservoir fluids from
18 coming up the tubing.

19 Q. In your opinion, did the plug
20 interfere with the ability to pump well kill
21 fluid down the tubing?

22 A. No.

23 Q. Why not?

24 A. Because we perforated holes
25 above the plug and were able to circulate

1 from there.

2 Q. But your subsequent kill
3 attempts were not able to overcome the upward
4 flow of gas from the reservoir. Is that
5 correct?

6 MR. LOTTERMAN: Objection,
7 leading.

8 BY MR. KELLY:

9 Q. Strike that.

10 A. I'd have --

11 Q. Let me rephrase.

12 Were your subsequent kill
13 attempts able to overcome the upward flow of
14 gas from the reservoir?

15 A. Subsequent being after?

16 Q. Yes, after you set the plug.

17 A. Gas continued to flow after
18 additional kills.

19 Q. Okay. Let me show you an
20 exhibit previously marked as 246-3.

21 A. Uh-huh.

22 Q. I'll ask you to take just a
23 minute and review this document. The first
24 page of this document is an e-mail from a
25 gentleman named James Mansdorfer, dated

1 December 3, 2015.

2 And then there are two hand
3 sketches or drawings attached to it. You do
4 not need to read the last pages of this
5 document titled Draft SS-25 Well Control Plan
6 because I'm not going to ask you any
7 questions about that, okay?

8 A. Okay.

9 (Document review by witness.)

10 A. Okay.

11 BY MR. KELLY:

12 Q. If you could look at the --
13 there's two drawings that are attached to
14 this memo, pages 34 and 35.

15 A. Okay.

16 Q. The first drawing is one where
17 Mr. Mansdorfer has attempted to indicate how
18 a kill would act without the plug, and in the
19 second one, he's attempted to document how
20 the kill would act with the plug in it.

21 Do you see that?

22 A. Uh-huh.

23 MR. LOTTERMAN: Objection,
24 leading, foundation, speculation.

25 BY MR. KELLY:

1 Q. Turning you to page 35,
2 Mr. Mansdorfer notes that SS-25 as currently
3 configured with tubing plug. You lose
4 benefit of downward momentum of kill fluid to
5 overcome upward momentum of gas.

6 Do you see that?

7 MR. LOTTERMAN: Same
8 objections.

9 A. I don't see it. Where?

10 MR. HELSLEY: Let me help you.
11 Help you out. It's right here.

12 THE WITNESS: Oh.

13 MR. HELSLEY: Second page.

14 A. Yes, I see this picture.

15 BY MR. KELLY:

16 Q. Okay. And you see where he's
17 written "SS-25 as currently configured with
18 tubing plug" at the top there?

19 A. Yes.

20 Q. And then he writes, "Lose
21 benefit of downward momentum of kill fluid to
22 overcome upward momentum of gas."

23 Do you see that?

24 MR. LOTTERMAN: Same
25 objections.

1 A. Okay. Okay, I see that.

2 BY MR. KELLY:

3 Q. Okay. Do you agree with his
4 drawing and his opinion or do you disagree
5 with it?

6 MR. LOTTERMAN: Same
7 objections, and compound.

8 A. I would disagree with him.

9 BY MR. KELLY:

10 Q. Okay. Why do you disagree?

11 A. Because if I recall right,
12 we -- I mean, the plug and the perforations
13 didn't have any effect on how fast -- you
14 know, how fast we could pump. I mean, it
15 wasn't a limiting factor.

16 Q. Okay. Do you know who
17 Mr. Mansdorfer is?

18 A. I have no idea.

19 Q. Okay. Did you ever speak with
20 Mr. Mansdorfer?

21 A. I don't know. I don't believe
22 so.

23 Q. When was the -- when was the
24 plug inserted into the tubing in SS-25?

25 (Document review by witness.)

1 A. November 12th. No.

2 November 12th.

3 BY MR. KELLY:

4 Q. Okay. So the plug was inserted
5 November 12th, 2015?

6 A. That's correct.

7 Q. Okay. And while you were at
8 Aliso Canyon, did you attempt to perform what
9 was commonly referred to as a junk shot?

10 A. Yes.

11 Q. Could you tell the jury what a
12 junk shot is, please?

13 A. So a junk shot's used --
14 consists of ball bearings, rope, cut-up inner
15 tube, golf balls, but the objective is to
16 pump it into the well and plug up a hole in
17 the tubular.

18 Q. In the tube or the casing?

19 A. Tubulars being casing, tubing.
20 I'm sorry, just pipe. That's a name for just
21 pipe.

22 Q. Okay. And did you attempt to
23 perform a junk shot?

24 A. Yes.

25 Q. When?

1 A. I just saw it. November 13th.

2 Q. So the day after the plug was
3 inserted?

4 A. Correct.

5 Q. Okay.

6 A. And we pumped the junk shot
7 down the casing, not the tubing.

8 Q. Okay. Was it successful in
9 stopping the flow of gas from the well?

10 A. It was not.

11 Q. Was not?

12 A. No.

13 Q. What happened when you pumped
14 the -- it's just junk, right?

15 A. I believe it was -- I don't
16 recall exactly, but I believe it was like
17 some golf balls and rope and maybe some
18 cut-up inner tube.

19 Q. Okay. And you pumped that down
20 the casing?

21 A. Yes.

22 Q. What do you pump it out of?

23 A. Well, we built a little
24 manifold with some pump iron, and stuffed the
25 stuff in there and shut the valve and pumped

1 it in the well.

2 Q. Okay. What was the volume of
3 junk that you pumped into the well?

4 A. I don't have a number on it.
5 As much as we could get stuffed into the pump
6 iron.

7 Q. What's a pump iron?

8 A. It's a piece of pipe
9 (demonstrating), about 2 inches.

10 Q. Okay. I mean, are we talking
11 about a bucket of junk or barrels of junk?

12 A. No, it wouldn't have been
13 barrels. I don't know how to -- we didn't
14 measure it before we, you know, stuffed it in
15 the pipe till we couldn't get any more in
16 there, and then we pumped it down the hole.

17 Q. Okay. And did it come back up?

18 A. I think, yes.

19 Q. Okay. The golf balls were
20 coming back up out of the hole?

21 A. I think we found one later, if
22 I recall. But, yes, I mean, they went
23 somewhere out of the hole.

24 Q. Okay. But they weren't
25 shooting up into the air, were they?

1 A. I don't recall ever seeing it
2 being shot out in the air.

3 Q. Okay. So they're just kind of
4 coming up into the crater?

5 A. Yes. I mean -- the one we
6 found, it would have been laying on the
7 ground or something somewhere.

8 Q. Okay.

9 A. If they were shot out, I didn't
10 see them leaving the hole.

11 Q. Okay. And the plug was left in
12 during all of the subsequent kill attempts --

13 A. Correct.

14 Q. -- that you performed?

15 A. Yeah.

16 Q. Yes?

17 A. Yes.

18 Q. When you were rotated out of
19 the Aliso Canyon SS-25 job, did somebody come
20 in to replace you?

21 A. Yes. I mean, to -- yes. I
22 mean, a new crew came to replace us.

23 Q. So basically the people who had
24 come in in October were replaced by a new
25 crew?

1 A. I don't remember if -- yes.

2 Q. Okay. And did that happen kind
3 of around early December?

4 A. Early December, yes.

5 Q. Okay.

6 MR. KELLY: I'll pass the
7 witness.

8 MR. ESBENSHADE: Let's go off
9 the record.

10 THE VIDEOGRAPHER: Off the
11 record, 12:12.

12 (Recess taken, 12:12 p.m. to
13 12:17 p.m.)

14 THE VIDEOGRAPHER: The time is
15 12:17, back on the record.

16 EXAMINATION

17 BY MR. ESBENSHADE:

18 Q. Mr. Walzel, my name is Andy
19 Esbenshade. I'm going to continue some
20 questioning, and I represent Toll Brothers
21 and Porter Ranch Development Company in this
22 lawsuit, okay?

23 Is there any reason that you
24 can't continue with your testimony this
25 afternoon?

1 A. No.

2 Q. Did you do anything to prepare
3 for today's deposition?

4 A. No.

5 Q. Did you meet with or speak over
6 the phone with lawyers for Boots & Coots?

7 A. I mean, I talked -- we met.

8 Q. And how many times did you meet
9 with lawyers from Boots & Coots to prepare
10 for today's deposition?

11 A. Two days or a day -- on two
12 days.

13 Q. Approximately how long were
14 each of those meetings?

15 A. The first day was a couple of
16 hours, and then -- I don't know, maybe six
17 hours the second day.

18 Q. And did you have any other
19 meetings to prepare for today's deposition
20 besides those two?

21 A. No.

22 Q. Did you have any phone calls to
23 prepare for today's deposition?

24 A. No.

25 Q. Did you review any documents to

1 prepare for today's deposition?

2 A. No.

3 Q. And just so we have a clean
4 record, I think you're doing a better job
5 than in the beginning, but try to let me
6 finish my question --

7 A. Okay.

8 Q. -- and I will do my best to let
9 you finish your answer before I ask another
10 question, okay?

11 A. Oh, I'm sorry.

12 Q. That's okay.

13 Have you spoken to anyone
14 representing Southern California Gas or
15 Sempra with regard to your deposition today?

16 A. No.

17 Q. If you could look at what's
18 been marked as Exhibit 246-2 in front of you,
19 it's the testimony. It's right there.

20 A. Okay.

21 Q. I just wanted to confirm that
22 this testimony you gave before the California
23 Public Utilities Commission, you understand
24 that that was testimony under oath, correct?

25 A. Yes.

1 Q. And the testimony you gave to
2 the California Public Utilities Commission
3 was truthful and accurate to the best of your
4 knowledge?

5 A. To the best of my knowledge,
6 yeah.

7 Q. If you could look at page 37 of
8 that testimony.

9 A. Okay. Yes, 37.

10 Q. Yeah, it should be at the upper
11 right where the numbers are. Right near the
12 top of that, it identifies you, Witness
13 Walzel, as testifying on line 3: "I mean,
14 the definition of a blowout is an
15 uncontrolled flow or release," and then your
16 colleague, Mr. Kopecky, finishes, "To the
17 atmosphere."

18 Do you see that?

19 A. Yes.

20 Q. And that was an accurate
21 statement of your understanding of the
22 definition of a blowout, correct?

23 MR. LOTTERMAN: You know, you
24 may want to just finish with
25 Mr. Walzel's final part of his answer,

1 just to be complete.

2 MR. ESBENSHADE: That's fine.

3 BY MR. ESBENSHADE:

4 Q. And you added "or underground."
5 So I'll just go back.

6 You stated under oath that your
7 understanding of the definition of a blowout
8 is an uncontrolled flow or release.
9 Mr. Kopecky added "to the atmosphere" and you
10 added "or underground."

11 A. Yes.

12 Q. And that's accurate to your
13 understanding?

14 A. Yes.

15 Q. And you would describe the
16 SS-25 incident as a blowout, correct?

17 A. Yes.

18 Q. You arrived at the Aliso Canyon
19 facility on October 25th, a Sunday, of 2015?

20 Do you recall generally that?

21 A. Generally that, yes.

22 Q. And when you -- you arrived
23 with Mr. Clayton and Mr. Kopecky? Is that
24 correct?

25 A. Yes.

1 Q. And until sometime in early
2 December, you, Mr. Kopecky and Mr. Clayton
3 were the Boots & Coots team that was working
4 on the response to the SS-25 blowout,
5 correct?

6 A. Yes.

7 Q. And was there anyone else that
8 was working with you from Boots & Coots at
9 the Aliso Canyon facility through November
10 of 2015?

11 A. Anybody else? Mike Baggett.

12 Q. Anyone besides the four of you,
13 you, Mr. Kopecky, Mr. Clayton and
14 Mr. Baggett?

15 A. Up until what date?

16 Q. Through November of 2015.

17 A. I believe that's correct, yes.
18 It was just us.

19 Q. And then you left in --
20 sometime in the first half of December of
21 2015, correct?

22 A. Yes.

23 Q. And after that point, did you
24 have any further role in the response to the
25 SS-25 blowout?

1 A. No.

2 Q. You didn't continue to
3 communicate with those people from Boots &
4 Coots that were at the Aliso Canyon facility
5 about the SS-25 blowout?

6 A. Well, you know, I'd read the
7 daily reports when they'd send them in to the
8 office, and I don't recall if I ever called
9 them on the phone or anything. But, you
10 know, kept up with it through the reports and
11 stuff.

12 Q. But you did not take any active
13 role in responding to the SS-25 blowout once
14 you left the Aliso Canyon facility?

15 A. No. I mean, after I left, they
16 did one more kill, and then it was a relief
17 well and, you know, I didn't have any part on
18 a relief well.

19 Q. Did you have any part on that
20 last kill attempt that took place in December
21 of 2015?

22 A. No.

23 Q. When you and Mr. Kopecky and
24 Mr. Clayton arrived at the Aliso Canyon
25 facility, was the equipment needed for a

1 surface well kill attempt on-site at the
2 facility?

3 A. I don't recall where the -- I
4 mean, we ordered pumps and everything, so I
5 don't -- the pumps that came weren't on this
6 facility.

7 Q. So once you and the rest of
8 your Boots & Coots colleagues arrived, you
9 ordered pumps and other equipment that was
10 necessary for the well kill attempt?

11 A. Correct.

12 Q. Okay. And at the time that you
13 and the other Boots & Coots employees arrived
14 at the Aliso Canyon facility, were you told
15 by Southern California Gas if they knew where
16 the leak was in the SS-25 well?

17 A. No. I don't recall being told
18 it -- where the leak -- you know, an exact
19 depth or -- no. No.

20 Q. Was it your understanding that
21 Southern California Gas did not know at that
22 time where the leak was in SS-25?

23 MR. LOTTERMAN: Objection,
24 foundation, speculation.

25 A. Well, I mean, they didn't -- I

1 don't recall a number being talked about, so,
2 you know, that was part of running logs and
3 stuff to try to determine where it would be
4 because that would be -- you know, that
5 would -- it's part of the whole planning
6 process for killing the well.

7 BY MR. ESBENSHADE:

8 Q. And when you refer to the logs
9 and the planning process for killing the
10 well, you're talking about what Boots & Coots
11 did prior to attempting to kill the well,
12 correct?

13 A. Correct.

14 Q. Okay. And do you know whether
15 Southern California Gas had done any logs or
16 other efforts to determine where the leak was
17 in SS-25 by the time you and your colleagues
18 arrived?

19 A. I don't know of any.

20 Q. They didn't provide any to you?

21 A. No. I mean, they called us on
22 one day and we showed up the next, or soon
23 after, and ordered these noise-to-temperature
24 tools and stuff.

25 Q. And the information you were

1 provided by Southern California Gas was
2 historical records related to the well,
3 correct?

4 A. Yes.

5 Q. There was nothing like, "Here's
6 a temperature or a noise log that we ran
7 since the SS-25 blowout was discovered"?

8 A. No.

9 Q. Okay. And there was some
10 discussion earlier with Mr. Kelly about part
11 of the effort Southern California Gas had
12 made -- let me step back.

13 You were aware when you arrived
14 that Southern California Gas had made an
15 attempt to kill the well themselves on the
16 prior day, correct?

17 MR. LOTTERMAN: Objection,
18 leading.

19 A. The bullhead -- I mean, the
20 e-mail said -- described the bullhead.

21 BY MR. ESBENSHADE:

22 Q. Other than what was in the
23 e-mail, did you have an understanding of what
24 Southern California Gas had done to try to
25 kill the SS-25 well prior to your arrival?

1 A. No. I mean, the description in
2 the e-mail was -- I knew what -- you know, I
3 understand what happened.

4 Q. Did you know, for instance,
5 what weight of kill fluid was used in
6 Southern California Gas' effort to kill the
7 well?

8 A. It says 8.6.

9 Q. And did you have an
10 understanding that Southern California Gas
11 pumped fluid down the casing annulus as part
12 of its effort to attempt to kill the SS-25
13 well before Boots & Coots arrived?

14 A. Yes.

15 Q. And did you have an
16 understanding of what the outcome was of
17 Southern California Gas' attempt to pump
18 fluid down the casing annulus to kill SS-25?

19 A. I'm sorry?

20 Q. Did you have an understanding
21 as to what happened when Southern California
22 Gas --

23 A. Yes.

24 Q. -- pumped fluid down the casing
25 annulus?

1 A. Yes. It says right here.

2 Q. And what does it say?

3 A. Bullhead, attempt to lube and
4 bleed, and gas broached venting to surface.
5 It's what James reported, been told.

6 Q. So that's what Mr. Kopecky was
7 told by Southern California Gas?

8 A. Yes.

9 Q. And you understand that to mean
10 after Southern California Gas pumped fluid
11 down the casing annulus, gas began to come
12 out through fissures in the surface?

13 MR. LOTTERMAN: Objection,
14 leading.

15 BY MR. ESBENSHADE:

16 Q. Cracks in the surface?

17 MR. LOTTERMAN: Same objection.

18 A. Yes. I mean, that's what he
19 reported.

20 BY MR. ESBENSHADE:

21 Q. Okay. So you have an
22 understanding that Southern California Gas'
23 pumping of fluid down the casing annulus made
24 the situation at SS-25 worse, correct?

25 MR. LOTTERMAN: Objection,

1 leading and foundation.

2 A. I mean, what I understand is
3 that they pumped and afterwards gas was
4 reported to the surface.

5 BY MR. ESBENSHADE:

6 Q. Did Boots & Coots ever pump
7 well kill fluid through the casing annulus in
8 any of its well kill efforts that you were
9 involved in?

10 A. No. The only pumping we did
11 down the annulus was to attempt to plug a
12 hole in the casing with a junk shot.

13 Q. And why did Boots & Coots not
14 pump kill fluid through the casing annulus as
15 part of its efforts to kill the SS-25
16 blowout?

17 A. Well, from -- I mean, from the
18 junk shot, I mean, there was a hole
19 somewhere, so any fluid -- it wouldn't have
20 made it to bottom with the hole there.

21 Q. And were you concerned that it
22 would increase the flow of gas out of the
23 well?

24 A. That wasn't a concern. It was
25 just not being able to get kill fluids to

1 where we need it to go.

2 Q. Boots & Coots ran temperature
3 logs and noise logs prior to making any well
4 kill attempt on SS-25? Is that correct?

5 MR. LOTTERMAN: Objection,
6 leading.

7 A. We ran the noise/temp. I
8 believe it was before the first kill.

9 BY MR. ESBENSHADE:

10 Q. And is that, in your
11 experience, standard procedure for a well
12 kill attempt?

13 A. Yes.

14 Q. And you believe it's a prudent
15 practice to run those logs prior to a well
16 kill attempt, correct?

17 A. Yes.

18 Q. With regard to the first well
19 kill attempt that Boots & Coots made, which I
20 think you -- after looking at
21 Exhibit 242-1 -- decided was November 13th,
22 2015. Is that correct?

23 A. Yes.

24 Q. Okay. How did Boots & Coots
25 calculate the weight of the kill fluid that

1 would be used for that first well kill
2 attempt?

3 A. Well, we knew what the
4 reservoir pressure was and so calculated, you
5 know, a mud weight more than what the pore
6 pressure was.

7 Q. And who made that calculation?

8 A. I calculated that, and I'm
9 sure, you know, other people. I mean, it's a
10 common drilling equation.

11 Q. Okay. But do you recall with
12 regard to the first well kill attempt who
13 actually made the calculation for that, that
14 attempt of the well kill fluid weight?

15 A. Right. I mean, like I said, I
16 would have done it for sure.

17 Q. Okay. And do you also -- for
18 the first well kill attempt, did someone at
19 Boots & Coots also calculate the pumping rate
20 for the kill fluid?

21 A. No. I mean, the rate was going
22 to be based off of pressure. You know, the
23 more you pump, the higher the pressure, so we
24 had a limit -- a pressure limit due to the
25 surface equipment.

1 Q. And somebody made that
2 calculation of what the maximum pump rate
3 could be, correct?

4 A. I mean, it wasn't a -- you have
5 the equipment's rated for this pressure at
6 a -- you know, a safety factor was added in,
7 and we were going to go to that limit.

8 Q. And is the maximum pump rate
9 that can be used based on the equipment, is
10 that impacted by the weight of the fluid?

11 A. The heavier -- I mean, the
12 heavier the fluid, the more friction pressure
13 you'll have, so the higher pressures, pump
14 pressures.

15 Q. So the higher the weight of the
16 kill fluid, all other things being equal, you
17 have to use a lower pump rate so as not to
18 exceed the maximum pressure, correct?

19 A. Yes. I mean, that's typically
20 the way it works, you know, because the
21 more -- yes.

22 Q. Okay. So you calculated the
23 weight for the kill fluid --

24 A. Uh-huh.

25 Q. -- for the first well kill

1 attempt, and then that, in combination with
2 the maximum pressure the wellhead can
3 withstand determined the pump rate that would
4 be used?

5 MR. LOTTERMAN: Objection,
6 leading.

7 A. Yes. I mean, we knew the
8 weight and then, you know -- yes. I mean,
9 but we just set a limit on what we felt safe
10 to pump at, pump pressure.

11 BY MR. ESBENSHADE:

12 Q. And prior to that first well
13 kill attempt, had there been any kind of
14 transient or dynamic modeling done by Boots &
15 Coots?

16 A. I hadn't, no.

17 Q. And are you aware of anyone
18 else at Boots & Coots that had done any such
19 modeling prior to the first well kill
20 attempt?

21 A. No.

22 Q. And you testified earlier that
23 at one point -- at some point you did do some
24 transient modeling, correct?

25 A. Correct.

1 Q. And when did you do your
2 modeling in regard to the various well kill
3 attempts that Boots & Coots made?

4 A. It would have been after our --
5 I mean, it would have been some --
6 probably -- I don't have the date, but, you
7 know, not the first one. After our second
8 one.

9 Q. And -- I'm sorry, are you
10 finished?

11 A. Yes. I was just going back
12 over in my head the different numbering
13 systems.

14 Q. So you believe that you did
15 your transient modeling after the second
16 Boots & Coots well kill attempt?

17 A. No. Yeah. Yeah, which
18 probably would have been the third.

19 Q. Third including the Southern
20 California Gas attempt, correct?

21 A. Yeah, the best I can recall.

22 Q. Between the first well kill
23 attempt that Boots & Coots did and the second
24 well kill attempt that Boots & Coots did, do
25 you recall any calculations or modeling to

1 determine whether the weight of the kill
2 fluid should be changed from the first well
3 kill attempt?

4 A. No. We -- you know, you can
5 either change the weight or the rate that you
6 pump, and we increased -- tried to increase
7 the rate.

8 Q. So between the first and the
9 second well kill attempt that Boots & Coots
10 conducted, the weight of the kill fluid
11 stayed the same but the pumping rate was
12 increased?

13 A. Yes.

14 Q. And you talked earlier about
15 every well kill attempt, even if it's not
16 successful in stopping the flow of gas, you
17 gain some information.

18 A. Yes.

19 Q. So was the increase in pump
20 rate something that you and the other Boots &
21 Coots employees decided to do based on the
22 results of the first well kill attempt?

23 A. Yes. I mean, like I said,
24 after the -- after we did the kill and shut
25 the pumps off, the flow stopped for -- I

1 didn't time it, but some time, you know.
2 So -- and then it came back. So the pump
3 rate was increased to -- you know, when we
4 felt like we could safely increase it,
5 then -- but, you know, that's the difference,
6 we increased the rate.

7 Q. And did you and the other
8 Boots & Coots employees consider increasing
9 the weight of the kill fluid rather than
10 increasing the pump rate?

11 A. I don't recall discussing it.

12 Q. With regard to the modeling
13 that you did after the second well kill
14 attempt, can you explain what exactly that
15 modeling entailed?

16 A. Right.

17 So I, you know, started
18 building a model the best -- with the best
19 understanding I had of the well, you know,
20 where holes might be or whatever, and the
21 plug and the perforations. And then, you
22 know, used, you know, 30 cubic -- 30 million
23 cubic feet a day, 40, 50, 60, and I recall
24 going up to maybe 70 million a day.

25 Q. And so those were all factors

1 that you utilized in building your model?

2 A. Right. Like in my model, I
3 said if it's flowing this much, you know,
4 assuming the model I built was accurate, you
5 know, it's still a lot of unknowns in the
6 well. You know, if we pump this weight at
7 this rate, will it kill it, you know.

8 Q. You referenced one of the
9 factors being where the holes might be.

10 A. Uh-huh.

11 Q. You're referring to holes in
12 the well, correct?

13 A. In the well, yes, sir.

14 Q. And did you know at that time
15 after the second well kill attempt where the
16 leaks in the SS-25 well were?

17 A. I didn't have -- you know,
18 exact depth was not -- couldn't determine an
19 exact depth.

20 Q. And you referenced using
21 various estimates for the amount of cubic
22 feet a day that were escaping the SS-25 well,
23 correct?

24 A. Yes.

25 Q. And you said, I believe, you

1 had various estimates between 30 and
2 70 million cubic feet a day of gas escaping
3 the SS-25 well? Is that correct?

4 A. Yes.

5 Q. And where did you get those
6 numbers? Were those provided by Southern
7 California Gas?

8 MR. LOTTERMAN: Objection,
9 leading.

10 A. Yes. I mean, usually we ask,
11 you know, for a number and we're given a
12 number. And then, you know, then I -- and
13 then you would just, you know, add more to
14 it, you know, just to see why, because, you
15 know, if it didn't kill it, either your model
16 is not right or there's something going on
17 you don't know about or, you know, any of the
18 inputs that are -- a lot of them are unknown,
19 affect the model, you know.

20 And even with the model up, I
21 haven't seen a well kill go just follow the
22 line of the model, you know.

23 BY MR. ESBENSHADE:

24 Q. So you're saying if the
25 estimate of the amount of gas that is being

1 released by the well is too low, that's going
2 to throw off the result of the modeling,
3 correct?

4 MR. LOTTERMAN: Objection,
5 leading.

6 A. Well, I mean, if the gas --
7 yes. The gas rate is a factor as well as,
8 you know, flow paths, wellbore geometries, if
9 there's a washout behind the casing, you
10 know, where the hole depths are, size of the
11 holes, anything.

12 BY MR. ESBENSHADE:

13 Q. And I think you said this, but
14 the estimates for the amount of gas escaping
15 the SS-25 well were provided to you by
16 Southern California Gas, correct?

17 MR. LOTTERMAN: Objection,
18 misstates testimony, leading.

19 A. Yes.

20 BY MR. ESBENSHADE:

21 Q. And then you added a safety
22 factor on top of that, correct?

23 MR. LOTTERMAN: Leading.

24 A. Yeah. I chose gas rates
25 higher, because like I said, it's either the

1 gas rate or the inputs that you think are
2 happening down in the hole -- you know, down
3 in the well.

4 BY MR. ESBENSHADE:

5 Q. So just to make sure I
6 understand, you used 30 million cubic feet as
7 sort of the low end of what you used. If you
8 were provided the number 30 million cubic
9 feet, you might have put into the model
10 40 million cubic feet so that you had a
11 10-million-cubic-foot sort of cushion in
12 running the model. Is that correct?

13 MR. LOTTERMAN: Objection,
14 leading.

15 A. Correct.

16 BY MR. ESBENSHADE:

17 Q. And if, even with your cushion
18 you provided, if the number for the amount of
19 gas escaping the well is too low, that could
20 throw off the results of the model, correct?

21 MR. LOTTERMAN: Objection,
22 leading.

23 A. It could. Assuming -- you
24 know, if everything else you assumed in the
25 model was correct, yes.

1 BY MR. ESBENSHADE:

2 Q. Okay. Now, do you recall you
3 ran the model after the second Boots & Coots
4 well kill attempt, correct?

5 A. I believe -- I believe so.

6 Q. And did the results of your
7 modeling end up changing the approach Boots &
8 Coots took to the next well kill attempt?

9 A. What I remember is that
10 there's -- I think it was -- I recall at 60,
11 it said we could have killed it pumping at
12 the rates we were pumping at.

13 Q. Did that indicate to you that
14 the amount of gas escaping the well could
15 have been greater than 60 million cubic feet
16 a day?

17 A. Well, from that, I mean, I
18 determined that -- it says I should be able
19 to at 60 or either our gas estimates, you
20 know, need to be changed or there's something
21 in the well that, you know, I'm not -- that
22 wasn't accounted for in the modeling.

23 Q. So based on that, did Boots &
24 Coots change its approach in any way for the
25 next well kill effort?

1 A. No. I believe -- well, I mean,
2 the last -- I recall pumping at a faster
3 rate.

4 Q. Okay. So the -- your
5 recollection is after running the modeling,
6 the weight of the well kill fluid did not
7 change, correct?

8 A. I don't recall changing it.

9 Q. Okay. But the pumping rate was
10 again increased --

11 A. Right.

12 Q. -- correct?

13 A. Right. Because, you know, the
14 pressure and all that is a factor, but also
15 what was happening to the well was, you know,
16 if you got to a certain rate and it was
17 getting -- moving too much, then, you know,
18 you didn't want to damage the wellhead and
19 lose access to the well. So, you know, based
20 on those factors is what we actually pumped
21 during the job.

22 Q. Okay. And that third well kill
23 effort was not successful in stopping the gas
24 from escaping from SS-25, correct?

25 A. Correct.

1 Q. And then did you again run the
2 model after the third effort to determine how
3 to make the well kill effort the next time?

4 A. I don't recall if I changed,
5 you know, other than just trying to go
6 through and verify, you know, at this rate
7 you should be able to kill it.

8 Q. And could you figure out why
9 the well kill attempt was not successful when
10 the modeling indicated it should be?

11 A. I couldn't give a definite
12 answer on why it wasn't, you know. You know,
13 reality wasn't matching the model.

14 Q. And was anyone else from
15 Boots & Coots working with you on this model
16 at the time?

17 A. I sent -- I talked to Arash
18 with it over the phone and went over what I
19 was doing, you know, what I did, and he,
20 I guess, repeated it in the office.

21 Q. And do you consider Arash to be
22 sort of the expert on these kind of transient
23 modeling and simulations at Boots & Coots?

24 A. Yes.

25 Q. And did Arash make any changes

1 to the modeling you were doing after you
2 discussed it with him?

3 A. I don't recall any changes
4 being discussed.

5 Q. Okay. Did either Mr. Kopecky
6 or Mr. Clayton work with you on the modeling?

7 A. No.

8 Q. And I think you said you -- did
9 you say you spoke with Mr. Arash or you sent
10 him the model? Sorry, not Mr. Arash.

11 A. I -- I --

12 Q. Sorry, let me step back and
13 start that again.

14 A. Okay.

15 Q. Did you send the model to
16 Arash?

17 A. I didn't e-mail him -- I
18 e-mailed him, I believe, a description, and
19 then, you know, holes here, rates, you know.
20 But, no, I didn't e-mail him the file I had
21 built.

22 Q. Do you recall e-mailing that
23 file of the model you built to anyone else at
24 Boots & Coots?

25 A. No. I didn't, no.

1 Q. Did you ever share the model
2 that you built with anyone at Southern
3 California Gas?

4 A. I don't believe I showed them
5 other than, you know, the results, discussed
6 the results with them of what it said.

7 Q. And who did you discuss the
8 results of your modeling with at Southern
9 California Gas?

10 A. It would have been Bret Lane.

11 Q. Anyone else?

12 A. I can't think of -- I don't
13 recall.

14 Q. Did Mr. Lane provide any input
15 to you or feedback regarding the modeling you
16 were doing?

17 A. I don't recall. You know, I
18 don't recall the discussion, but, no, I don't
19 recall any changes.

20 Q. And you described earlier that
21 the computer you had at the time of the
22 modeling was later stolen.

23 A. Yes, sir.

24 Q. Today, if you wanted to get a
25 copy or get access to the modeling that you

1 did during the well kill efforts for SS-25,
2 who would you contact or what would you do?

3 A. I don't -- I mean, I'd just
4 build another wellbore model in the -- you
5 know, in the program.

6 Q. Okay. And I appreciate that.
7 I'm referring to recovering the model that
8 you actually built at the time.

9 Did you ever at any point save
10 it to a Boots & Coots server or a system or
11 somewhere where it could be accessed by
12 others?

13 A. No.

14 Q. So the modeling that you did
15 was solely available, to your understanding,
16 from your laptop?

17 A. Yes, sir.

18 Q. And you don't recall ever
19 e-mailing it to anyone else?

20 A. No.

21 Q. And do you recall ever printing
22 it out? Is it something you would have
23 printed at the Aliso Canyon facility?

24 A. I don't -- no, I didn't print
25 it out.

1 Q. So as far as you know, there's
2 no way to recover the actual modeling that
3 you did for the well kill attempts on the
4 SS-25?

5 A. No. Other than just, you know,
6 recreating it.

7 Q. And are you aware that
8 sometime -- let me start over.

9 Are you aware that at some
10 point Arash did simulations of his own for
11 well -- the final well kill attempt of SS-25?

12 A. For the relief well?

13 Q. I think he separately did them
14 for the relief well, but I'm talking about
15 for the last surface well kill attempt that
16 Boots & Coots made, are you aware that Arash
17 ran simulations prior to that attempt?

18 A. I'm not -- no, I mean, I'm not
19 aware. The only discussions we had were the
20 ones that we -- you know, that I was -- when
21 I was out there.

22 Q. So you discussed with him while
23 you were building your model, correct?

24 A. Correct.

25 Q. But you didn't ever discuss

1 with Arash the model he was building or the
2 simulations he was doing?

3 A. No. I mean, I was aware he was
4 doing them for the relief well.

5 Q. Okay. Somewhere in front of
6 you I believe is Exhibit 242-1, which is the
7 collection of daily logs. I think it's to
8 your right underneath the big one.

9 A. Oh, this one.

10 Q. Yeah, that one. So I just
11 generally have a question. In terms of the
12 specifics of what was done on a day-to-day
13 basis, the weight of the kill fluid, the pump
14 rates that was used for each well kill
15 attempt, is that exhibit and the logs that
16 are in that exhibit, is that the best
17 information you have as to those well kill
18 attempts?

19 A. Yes.

20 Q. Okay. So if you wanted to
21 confirm what the weight of kill fluid was for
22 any of the attempts Boots & Coats made, you
23 would refer to that document?

24 A. Yes. I tried to make it as
25 accurate of a report for the day as possible.

1 Q. And you were the person who
2 filled those out for the period while you
3 were at Aliso Canyon, correct?

4 A. Yes, sir.

5 Q. And each of the logs that you
6 filled out was true and correct to the best
7 of your knowledge?

8 A. Yes.

9 Q. And it was as complete as you
10 could make it?

11 A. Yes.

12 Q. There was a discussion earlier
13 today about a subsurface safety valve that
14 had at some time been -- in the past, been
15 present in SS-25.

16 Do you generally recall that?

17 A. Yes.

18 Q. And your understanding was it
19 was not in place at the time of the SS-25
20 blowout, correct?

21 A. Yes.

22 Q. Okay. If the subsurface safety
23 valve had been in place in SS-25 at the time
24 of the blowout, that safety valve could have
25 been useful in responding to the blowout,

1 correct?

2 MR. LOTTERMAN: Objection,
3 foundation, speculation, calls for an
4 opinion.

5 A. Depending on -- it would depend
6 on the flow path.

7 BY MR. ESBENSHADE:

8 Q. So it might or might not have
9 been useful?

10 MR. LOTTERMAN: Same objection.

11 A. I mean, I can say it may --
12 yeah, may or may not have been.

13 BY MR. ESBENSHADE:

14 Q. Do you have in front of you a
15 document that was -- let me see, it might be
16 here. 242-12?

17 A. I don't have a 12.

18 Q. Okay. Let me get the exhibit
19 for you.

20 MR. ESBENSHADE: I'm going to
21 show the witness what's been
22 previously marked Exhibit 242-12,
23 which is a four-page document
24 beginning at SCG00020550.

25 BY MR. ESBENSHADE:

1 Q. Mr. Walzel, this is a document
2 I don't believe you're copied on. It is
3 something that Southern California Gas sent
4 to the California Public Utilities
5 Commission, and the last two pages are the
6 actual response that Southern California Gas
7 provided to the California Public Utilities
8 Commission.

9 Do you see that?

10 A. Yes.

11 Q. Have you -- do you recall
12 looking at this generally? Do you think
13 you've seen this document before?

14 A. No, I have not.

15 Q. Okay. If you look at the third
16 page, which is the actual response -- it's
17 the third including the back of that one --
18 at the bottom of that -- first of all,
19 question 1 asks Southern California Gas to
20 provide a summary of the well kill attempts
21 on SS-25, and there are seven attempts
22 listed.

23 Do you see that?

24 A. Yes.

25 Q. Okay. And the first one is

1 October 24 and they are all 2015. The
2 October 24 --

3 A. Wait. I have 22nd.

4 MR. HELSLEY: I think he's just
5 referring to --

6 BY MR. ESBENSHADE:

7 Q. Sorry. If you look at the
8 response to question 1, which is in the
9 middle of the page --

10 A. Okay.

11 Q. -- that you're on, the first
12 well kill attempt listed is October 24.

13 Do you see that?

14 A. Oh, yes, sir.

15 Q. Okay. And your understanding
16 is that's the well kill attempt that Southern
17 California Gas made, correct?

18 A. Yes.

19 Q. Okay. And then the next, from
20 number 2 through number 6, from November 13
21 to November 25, those are the five well kill
22 attempts that you were involved in, correct?

23 A. Yes.

24 Q. Okay. And then the last one,
25 number 7, is December 22nd, that is the well

1 kill attempt you were not involved in; you
2 had already left Aliso Canyon, correct?

3 A. Yes.

4 Q. Okay. And there was testimony
5 you provided earlier about a hydrate or ice
6 plug that had formed in SS-25. Is that the
7 primary reason that the first well kill
8 attempt Boots & Coots made was approximately
9 20 days after -- or 19 days after arriving at
10 Aliso Canyon?

11 A. Our first one?

12 Q. Yeah. Let me just step back
13 and try to ask more clearly.

14 You and Mr. Kopecky and
15 Mr. Clayton arrived at Aliso Canyon on
16 October 25th, 2015, correct?

17 A. Yes.

18 Q. And it was 19 days before the
19 first well kill attempt that Boots & Coots
20 made on SS-25, correct?

21 MR. LOTTERMAN: Objection,
22 leading.

23 A. Yeah. I mean, the first one
24 would have been that day or, you know...

25 BY MR. ESBENSHADE:

1 Q. And was the reason for that
2 delay or the reason for that amount of time
3 between when you arrived and when you
4 conducted the first well kill attempt the
5 hydrate or ice plug that had formed in SS-25?

6 A. There were some days -- you
7 know, we had to get -- remove the ice plug.
8 And then -- and I remember -- you know,
9 during the coiled tubing, because I read that
10 and I remembered, you know, we're going to --
11 we did some pumping with the -- down the coil
12 and circulate and then we observed the mud
13 coming out. And, you know, and then we --
14 so, you know, we still didn't -- nobody had
15 an idea of what was going on in the well, so
16 then, you know, the diagnostic logs took some
17 time. And so there were some days in there
18 for that too.

19 Q. Looking at the same document on
20 the same page, if you could stay where --
21 yeah. There's a question 2 below from the
22 California Public Utilities Commission that
23 states: Why did each of the well kill
24 attempts fail?

25 And if you look at the response

1 from Southern California Gas, it says: Based
2 upon the information available to SoCalGas at
3 the present time, and upon communications
4 with and review of documents and other
5 materials provided by our contractors
6 retained for the purpose of performing well
7 kill operations, we understand that the
8 weight of the fluids used during the kill
9 attempts appears to have been insufficient to
10 overcome the countervailing upward pressure
11 of natural gas being released from the
12 reservoir through the well, and so the
13 operations failed to regain hydrostatic
14 balance.

15 Do you agree with that response
16 from Southern California Gas?

17 MR. LOTTERMAN: Objection,
18 foundation.

19 BY MR. ESBENSHADE:

20 Q. With regard to the well kill
21 attempts in which you were involved?

22 MR. LOTTERMAN: Objection,
23 foundation, speculation. And vague.

24 A. Well, from -- you know, like we
25 talked about earlier in the modeling, the

1 modelings have showed that that weight,
2 pumping at the rates we were pumping at, were
3 enough, you know. The model said it would
4 have killed it.

5 So, you know -- I mean, could
6 be the weight or the rates, you know, and --
7 you know, could be other -- you know, could
8 be other factors as well.

9 BY MR. ESBENSHADE:

10 Q. So with regard to the response
11 by Southern California Gas that the weight of
12 the fluids used during the kill attempts
13 appears to have been insufficient, you
14 believe that might be the reason that they
15 were unsuccessful, but there might be other
16 factors?

17 MR. LOTTERMAN: Objection,
18 leading.

19 A. I mean, the mud weight and the
20 flow paths and all that, I consider them all
21 factors, you know.

22 BY MR. ESBENSHADE:

23 Q. And you can't say as you sit
24 here which you believe was the factor or
25 factors that caused the well kill attempts to

1 be unsuccessful?

2 A. I can't pinpoint one.

3 Q. Were you consulted on this --
4 let me step back.

5 The response we just read
6 states that it is based on, among other
7 things, documents and materials provided by
8 our contractors and communications.

9 Did you have any communications
10 with Southern California Gas regarding this
11 response?

12 A. I don't -- no. I don't recall
13 ever talking about this response.

14 Q. Okay. Did you provide any
15 documents to Southern California Gas related
16 to this response, that you know of?

17 A. I mean, I submitted daily --
18 you know, the daily reports and -- yeah, I
19 mean, mainly the daily reports and, you know,
20 pump down and stuff would have been from --
21 you know, the reports are our main thing.

22 Q. You referenced earlier at some
23 point in your testimony a hot zone?

24 A. Correct.

25 Q. Okay. And can you explain to

1 me and the jury, what is the hot zone with
2 regard to a well blowout?

3 A. So that's usually the area
4 closest to the well and determined by, you
5 know, our safety -- you know. It's just an
6 area around the well where if someone else
7 wants to come in there, we usually escort
8 them in or -- you know, you base that off of
9 wind direction, the amount of gas. It's the
10 most -- I guess you'd call it the most
11 secured area as far as people coming in and
12 out.

13 Q. So it's an area in which access
14 is restricted, correct?

15 A. Correct.

16 Q. Okay. And to -- Boots & Coots
17 people were permitted in the hot zone for
18 SS-25, correct?

19 A. Correct.

20 MR. LOTTERMAN: Objection,
21 leading.

22 BY MR. ESBENSHADE:

23 Q. If Southern California Gas
24 representatives wanted to come in the hot
25 zone, they were escorted? Is that what you

1 said?

2 A. Yes. We'd be there with them.

3 Q. Okay. And the reason that
4 access is restricted to the hot zone is
5 because it's a -- considered a more -- to
6 have greater safety risk, correct?

7 MR. LOTTERMAN: Objection,
8 leading.

9 A. Yeah. Typically, I mean,
10 any -- any -- you know -- yes. Yes,
11 there's -- you know, there could be more gas
12 or something like that in those areas.

13 BY MR. ESBENSHADE:

14 Q. And there's some risk of fire
15 when you have gas coming out of the ground,
16 correct?

17 A. Yes.

18 Q. And there's some risk of
19 landslide or other earth movement when you
20 have an unstable crater at a wellhead,
21 correct?

22 MR. LOTTERMAN: Objection,
23 leading and foundation, speculation.

24 A. I mean, I can't -- I wasn't
25 ever worried about a landslide.

1 BY MR. ESBENSHADE:

2 Q. Is that generally a risk that
3 is involved in well blowouts when a crater is
4 being formed around the wellhead?

5 A. Yes. I mean, you want to not
6 be around the crater, you know. You don't
7 want to fall in the crater.

8 Q. There are a number of safety
9 risks that are involved in well kill attempts
10 for a well blowout, correct?

11 A. Yeah, there's risks. Some
12 risks.

13 Q. And you consider it a dangerous
14 activity?

15 A. I mean, I'd just say there's
16 some risks involved when you do this -- do
17 the work.

18 Q. Enough risk that there has to
19 be a safety representative on-site at all
20 times, correct?

21 MR. LOTTERMAN: Objection,
22 leading.

23 A. I mean, when they're -- you
24 know, I can't say -- yeah. I mean, it's good
25 to have a safety person there.

1 BY MR. ESBENSHADE:

2 Q. Whenever there is any activity
3 at the site, there is a safety
4 representative --

5 A. Right.

6 Q. -- on-site, correct?

7 A. Yes.

8 MR. ESBENSHADE: I think it's
9 1:00 o'clock. We had decided to take
10 lunch, so why don't we take a break.

11 THE VIDEOGRAPHER: Off the
12 record, 1:02.

13 (Recess taken, 1:02 p.m. to
14 2:10 p.m.)

15 (Mr. Caselberry is no longer
16 present.)

17 THE VIDEOGRAPHER: Back on the
18 record, 2:10 p.m.

19 BY MR. ESBENSHADE:

20 Q. Good afternoon, Mr. Walzel. Is
21 there any reason that you can't continue with
22 your testimony?

23 A. No.

24 Q. You testified this morning
25 about observing oily mist released during the

1 well kill efforts. Do you generally recall
2 that?

3 A. Yes.

4 Q. I don't think you were able to
5 provide an exact estimate, but would you say
6 that the spray of oily mist was above your
7 head?

8 A. It would have depended on the
9 wind. I'd say, you know, maybe around my
10 height.

11 Q. And you referenced the wind.
12 You testified earlier that there were strong
13 winds in Aliso Canyon, correct?

14 A. Very strong. I don't
15 believe -- I don't know if I did, but there
16 was strong winds.

17 Q. And the winds, as you
18 referenced, would carry the oily mist,
19 correct?

20 A. Yes.

21 Q. And do you know how far the
22 oily mist spread from the SS-25 well site?

23 MR. LOTTERMAN: I'll object on
24 foundation grounds.

25 A. I mean, I didn't measure it.

1 There was a -- so the well was on top of the
2 hill and then there was a road that went
3 around, kinda, and, you know, maybe halfway
4 down that hill seems to be what I remember.

5 BY MR. ESBENSHADE:

6 Q. Do you know whether some of the
7 oily mist was carried farther than that?

8 A. I don't know.

9 Q. Did you ever come to understand
10 that some of the oily mist was carried beyond
11 the boundaries of the Aliso Canyon facility?

12 MR. LOTTERMAN: Objection,
13 foundation, speculation.

14 A. I read that in a subpoena.

15 BY MR. ESBENSHADE:

16 Q. But you personally don't know
17 either way whether the oily mist was carried
18 outside the boundaries of the Aliso Canyon
19 facility?

20 A. No, I don't know.

21 Q. Did anyone from Southern
22 California Gas express any concern as to
23 whether the oily mist that was released
24 during these well kill attempts was impacting
25 the community surrounding Aliso Canyon?

1 MR. HELSLEY: I'm just going to
2 state an objection. Are we going
3 outside -- are these meant to be PMQ
4 or is this meant to be just his own
5 personal knowledge?

6 MR. ESBENSHADE: I'm talking
7 about the five, I believe, well kill
8 attempts that Boots & Coots made where
9 he is the PMQ. So with regard to
10 those, so I'm talking about -- I'll
11 start over, but those are the well
12 kill attempts I'm referencing so I
13 think it's within the scope.

14 MR. LOTTERMAN: I guess what
15 counsel is asking is these questions
16 about the oily mist seem personal in
17 nature. Do you want to make those
18 percipient or PMQ?

19 MR. HELSLEY: And the reason I
20 ask is I don't -- the deposition
21 category of PMQ, it was somewhat
22 broad. It did say well kill attempts
23 and so I don't know that he's
24 necessarily prepared as a
25 representative to talk about the oil.

1 MR. ESBENSHADE: Okay. Why
2 don't -- I'll restate the question.
3 If you believe it's outside, just make
4 that objection and then we'll see what
5 happens.

6 MR. HELSLEY: Okay. Fair
7 enough.

8 MR. ESBENSHADE: I think it's
9 within generally, although I recognize
10 the topics are broad.

11 MR. LOTTERMAN: Okay.

12 BY MR. ESBENSHADE:

13 Q. So with regard to those well
14 kill attempts where you were present at Aliso
15 Canyon and on which you're generally the
16 person most qualified for Boots & Coots, did
17 anyone from SoCalGas ever express, during
18 those well kill attempts, concern as to
19 whether the oily mist that was released was
20 impacting the community surrounding Aliso
21 Canyon?

22 MR. HELSLEY: Objection, scope,
23 but go ahead.

24 MR. LOTTERMAN: Same.

25 A. Okay. I don't -- I don't -- I

1 mean, you know, we were containing it on the
2 site the best we could. I don't recall any
3 discussions that there was oil getting, you
4 know, outside the area that we were
5 maintaining.

6 BY MR. ESBENSHADE:

7 Q. And just to be clear, I'll
8 restate the question. But my question is
9 just whether anyone from SoCalGas expressed
10 concerns about it, so I'll reask the
11 question, but just so you have in mind that's
12 what the question is.

13 So what I asked was with regard
14 to the well kill attempts you were present
15 for at Aliso Canyon, did anyone from SoCalGas
16 ever express during those well kill attempts,
17 to your knowledge, concern about the oily
18 mist that was released impacting the
19 community surrounding Aliso Canyon?

20 MR. HELSLEY: Objection, scope.

21 Go ahead.

22 MR. LOTTERMAN: Same.

23 A. You know, I don't recall any
24 discussions about it. You know, we were
25 trying -- you know, we were trying to

1 maintain it. I mean, it's always a concern,
2 but I don't recall any conversations about
3 it.

4 BY MR. ESBENSHADE:

5 Q. Okay. And you referenced Bret
6 Lane earlier. Was Bret Lane present at all
7 of the well kill attempts that you were
8 present for?

9 A. As far as I can recall, he was
10 there every day.

11 Q. And you don't recall Mr. Lane
12 ever expressing any concern about the oily
13 mist that was released during his well kill
14 attempts impacting the community surrounding
15 Aliso Canyon?

16 A. I can't recall discussing it.
17 You know, we were just -- we were maintaining
18 it right there.

19 Q. And you don't recall any
20 discussion with or from Mr. Lane on that
21 subject?

22 MR. LOTTERMAN: Asked and
23 answered.

24 A. No. I don't recall discussing,
25 you know, other than monitoring the area and

1 where it has been. But, no, I don't --
2 specifically, I don't recall discussing it.

3 BY MR. ESBENSHADE:

4 Q. I'm going to mark as
5 Exhibit 248-1 a two-page document beginning
6 at HALLIBURTON00009.

7 (Whereupon, Deposition
8 Exhibit 248-1, Hazardous Work
9 Contract, HALLIBURTON000009 - 10, was
10 marked for identification.)

11 BY MR. ESBENSHADE:

12 Q. Mr. Walzel, do you recognize
13 this as a Halliburton contract for work,
14 Halliburton/Boots & Coots?

15 A. Yes.

16 Q. Okay. And looking at the first
17 paragraph, the date and then the description
18 and the reference to Standard Sesnon 25 in
19 Aliso Canyon, do you recognize that this is
20 at least one of the contracts under which
21 Boots & Coots was performing its services for
22 Southern California Gas and Sempra?

23 A. Yes, it appears so.

24 Q. And do you know on -- if you
25 look at page 2, there is a signature under

1 Halliburton Energy Services, it seems to say
2 strategic business manager.

3 Do you recognize the signature
4 above that?

5 A. I do not.

6 Q. And going back to the first
7 page, you see that this contract is entitled
8 Hazardous Work Contract, correct?

9 A. Yes.

10 Q. Okay. Do you know whether
11 there are different kinds of contracts that
12 Halliburton has or Boots & Coots has
13 depending on the particular project?

14 MR. HELSLEY: Objection, scope.
15 BY MR. ESBENSHADE:

16 Q. If you know.

17 A. I know there's, you know,
18 hazardous and nonhazardous, I guess you'd
19 call it.

20 Q. And the one that was used for
21 this particular project on SS-25 was the
22 Hazardous Work Contract?

23 A. Yes.

24 Q. Mr. Walzel, are you familiar
25 with Blade Energy Partners?

1 A. No.

2 Q. Are you aware that Blade Energy
3 Partners conducted a root cause analysis on
4 the SS-25 blowout?

5 A. Yes.

6 Q. Have you read the -- any part
7 of Blade Energy Partners' report on the SS-25
8 blowout?

9 A. I've skimmed through it and
10 seen some videos on YouTube.

11 Q. When you say "videos on
12 YouTube," was at least one of those the video
13 that Blade released kind of summarizing some
14 of their findings?

15 A. It was a picture of the well,
16 some gas pumped on it and came up around the
17 well.

18 Q. And when you say that you
19 skimmed -- I think you used the word
20 "skimmed" -- the Blade report on the SS-25
21 blowout, were there particular parts that you
22 read more closely?

23 A. I skimmed -- I remember looking
24 at the picture of the corrosion on the pipe
25 and then where it says, you know, discussed

1 the well kill attempts, the well control
2 company.

3 Q. I assume that was of more
4 interest to you because you were involved in
5 that?

6 A. Yes.

7 Q. When you say you saw the
8 picture of the corrosion on the pipe, was
9 that -- were those pictures you had seen
10 before?

11 A. No, I don't believe I saw them
12 before.

13 Q. Had you ever discussed with
14 anyone at Boots & Coots having seen corrosion
15 on any of the SS-25 well casings or tubings?

16 A. We didn't -- I didn't see any
17 corrosion on the pipe when I was there.

18 Q. Well, when you were there the
19 pipe was still in the ground.

20 A. Right.

21 Q. But did you at any point, after
22 the pipe was -- the well was removed, did you
23 discuss with anyone at Boots & Coots what
24 they had seen?

25 A. I mean, I recall hearing, you

1 know, it was pipe with corrosion on it.

2 Q. Did you hear that from
3 Mr. LaGrone?

4 A. Yes, probably so.

5 Q. Okay. And do you recall
6 what -- other than seeing corrosion of the
7 pipe, do you recall anything else that
8 Mr. LaGrone said about it?

9 A. No. That was -- corroded pipe.

10 Q. When you saw the photos in the
11 Blade report, was there anything that struck
12 you about the corrosion that you saw?

13 A. No. I mean, it looks like
14 corrosion.

15 Q. Was it pretty extensive from
16 what you could tell in the photo?

17 MR. LOTTERMAN: Objection,
18 foundation.

19 A. I mean, I don't have anything
20 to judge it on if it was excessive or -- I
21 mean, it looked like corrosion.

22 BY MR. ESBENSHADE:

23 Q. Do you have any knowledge about
24 the cause of the SS-25 blowout?

25 MR. HELSLEY: Again, I'll just

1 object as scope. I just -- go ahead.

2 MR. KELLY: That's probably
3 outside. He can answer it
4 individually.

5 MR. LOTTERMAN: Same.

6 A. You know, I read where they
7 called it microbial. I think that was
8 mentioned on YouTube or something. But as
9 far as what caused it, I mean, just the
10 things that normally cause corrosion. You
11 know, water and oxygen.

12 BY MR. ESBENSHADE:

13 Q. So in your experience, if water
14 comes in contact with a pipe over a long
15 enough period of time, there will be
16 corrosion?

17 MR. LOTTERMAN: Objection,
18 scope, foundation.

19 A. I mean, I can't say it happens
20 100% of the time, but I mean -- you know, I
21 can say it's not the first well that we've
22 been on that had corrosion on it or, you
23 know, was an issue on a well.

24 BY MR. ESBENSHADE:

25 Q. Did you discuss with anyone at

1 Boots & Coots any of the findings of the
2 Blade root cause analysis on the SS-25
3 blowout?

4 MR. HELSLEY: Objection, scope.
5 Go ahead.

6 A. Yeah. I mean, I -- Jim, you
7 know, just -- you know, and the report saying
8 if they had done this or that, you know,
9 their opinion was it would have been
10 different.

11 BY MR. ESBENSHADE:

12 Q. And when you referenced Jim,
13 you're referring to Jim LaGrone?

14 A. Correct, yes.

15 Q. Was there anything about
16 Blade's findings on the well kill attempts
17 for SS-25 that you thought was incorrect?

18 MR. HELSLEY: Objection, scope.
19 Go ahead.

20 A. I mean, I just had the
21 feeling --

22 MR. HELSLEY: Lacks foundation.
23 I'm sorry. I didn't mean to
24 interrupt. Go ahead.

25 A. You know, I mean -- I couldn't

1 comment on if it's correct or incorrect. I
2 haven't seen the modeling or work they did to
3 find it, you know, and then their estimates,
4 I didn't know -- you know, there was a lot of
5 verbiage in there. But, you know, I didn't
6 know enough to say that, oh, yeah, this is
7 correct or not, you know. I mean, they
8 looked at it for whatever, years, to come up
9 with those, you know, so I don't know how
10 they did it.

11 BY MR. ESBENSHADE:

12 Q. Other than Mr. LaGrone, is
13 there anyone else with whom you discussed the
14 Blade report on the SS-25 blowout?

15 A. I think there was one call
16 from -- his name is Bo Burris, and he asked
17 me if I had seen it, and I said no.

18 Q. At that time you hadn't seen
19 it, I take it?

20 A. No.

21 Q. Okay. Did Mr. Burris tell you
22 why he was asking about it?

23 A. He was -- he was asking about
24 the pumping and stuff. And I said, well, you
25 know, this is what we did, what we did. And

1 he said okay.

2 Q. Is there anything Mr. LaGrone
3 told you about the Blade report when you
4 spoke with him?

5 A. Nothing other than, you know,
6 came up with these conclusions, years or
7 whatever, after we did it. You know, he
8 didn't know how they came up with it either.

9 Q. I mentioned at the outset of my
10 questioning that I represent Toll Brothers.
11 At the time you were at Aliso Canyon, did you
12 have any knowledge that Toll Brothers owned
13 property adjacent to the Aliso Canyon
14 facility?

15 A. No.

16 Q. And you have no knowledge as to
17 whether there was any impact on the Toll
18 Brothers property based on the SS-25 blowout?

19 A. No.

20 MR. ESBENSHADE: Okay. I have
21 no more questions. Thank you for your
22 time.

23 THE WITNESS: All right. Thank
24 you.

25 MR. HELSLEY: You want to

1 switch? Is that easier?

2 MR. LOTTERMAN: I think I'm
3 okay right here if that's okay with
4 you.

5 MR. HELSLEY: Yeah.

6 EXAMINATION

7 BY MR. LOTTERMAN:

8 Q. Mr. Walzel, my name is Tom
9 Lotterman. I believe I shook your hand at
10 the beginning of today.

11 A. Yes.

12 Q. I know it's been a long day for
13 you, but I can tell you, you're in the fourth
14 quarter, and I would ask that you be patient
15 and stay focused, and I'll try to get through
16 my examination as quickly as I can, okay?

17 A. Okay.

18 Q. All right. And I wanted to
19 warn you that I'm going to go over some
20 fields that have already been plowed, but
21 it's mainly for context and mainly for flow
22 of testimony.

23 But as you'll see, I think I've
24 got a couple of documents that may or may not
25 help you with your recollection, okay?

1 A. Okay.

2 Q. And just to confirm, same rules
3 as you followed with Mr. Kelly and
4 Mr. Esbenshade as far as waiting for me to
5 finish my question; I'll wait for you to
6 finish your answer, and of course, be
7 truthful because you're still under oath.
8 All right?

9 A. Okay.

10 Q. All right. So tell me, as a
11 senior well control specialist engineer, how
12 many well control projects you've been on in
13 your lifetime.

14 A. Oh, I don't have a number off
15 the top of my head, but blowouts, probably 40
16 to 50.

17 Q. Okay.

18 A. You know, surface -- you know,
19 plus many other, you know, types of jobs.
20 Pressure jobs.

21 Q. I'll stick with blowouts.

22 A. Okay.

23 Q. How many blowouts have you been
24 involved with since the SS-25?

25 A. Well, I just had to come home

1 from one to be here, so that's one. I don't
2 know. Since then, 10, 10 to 15.

3 Q. All right. And again, just
4 your best estimate.

5 A. Uh-huh.

6 Q. The other thing I should tell
7 you is I'm going to ask you to -- you know,
8 we lawyers like to pick people's brains a
9 little bit. You should feel free to say "I
10 don't recall."

11 A. Okay.

12 Q. Because I'm going to get into
13 some detail here and I understand it's been a
14 while. Okay?

15 All right. What's a mud
16 engineer?

17 A. He's the person on location
18 with the company that builds the mud, the
19 drilling fluids.

20 Q. Was one needed at Aliso Canyon?

21 A. I'd say yes.

22 Q. And who played that role?

23 A. I don't recall his name or even
24 what company he worked for.

25 Q. And while you were on that

1 project, were you the one that told the mud
2 engineer what type of mud to mix?

3 A. I didn't specify, you know,
4 brine or anything.

5 Q. Who made that decision?

6 A. Initially -- well, initially,
7 you know, it was discussed and kind of
8 weighed the pros and cons. And, you know, we
9 still didn't know what was exactly going on
10 with the well, so it was preferred to use
11 brine. Because, I mean, that's what they
12 killed -- you know, when they were working
13 over wells, it was the same fluid that
14 they -- same type of fluid that I was told
15 that they killed all the wells with.

16 Q. I guess what I'm asking is who
17 is the person that told the mud engineer at
18 SS-25 what mud to use?

19 A. I don't -- I don't recall who
20 told him that.

21 Q. All right. You've been asked a
22 lot of questions -- or several questions
23 today about this Examination Under Oath that
24 you attended on August 8, 2018.

25 Do you recall those questions?

1 Vaguely?

2 A. Vaguely.

3 Q. All right. Did you get a
4 chance to read this transcript after you
5 attended this examination?

6 A. Is that the --

7 MR. HELSLEY: Go ahead. I'm
8 not sure the question is clear for
9 him, but go ahead.

10 BY MR. LOTTERMAN:

11 Q. So let me rephrase the
12 question. Before the last few days, had you
13 seen this transcript before?

14 A. No.

15 Q. Okay. So is it fair to say
16 that you did not have a chance to review and
17 make any corrections to this transcript?

18 MR. KELLY: Objection, calls
19 for speculation, lacks foundation.

20 A. Yeah. Before the last couple
21 of days, I didn't look at it or make any
22 corrections.

23 (Mr. Esbenshade left the
24 deposition room.)

25 --oOo--

1 BY MR. LOTTERMAN:

2 Q. All right. So when you
3 answered questions from Mr. Esbenshade and
4 Mr. Kelly about the accuracy of your
5 testimony, were you testifying about the
6 accuracy of the person who transcribed your
7 words?

8 MR. KELLY: Objection, calls
9 for speculation, lacks foundation.

10 A. No.

11 MR. KELLY: Argumentative.

12 BY MR. LOTTERMAN:

13 Q. I'm sorry?

14 A. No.

15 Q. Okay. I believe Mr. Kelly
16 asked you a number of questions as to your
17 training over time. Not your formal training
18 but sort of your training either through
19 Halliburton --

20 A. Right.

21 Q. -- and other companies. You
22 remember that?

23 Have you had any training in
24 modeling?

25 A. I took a -- when it was owned

1 by Drillbench or SPE Group -- that's what
2 I guess is the name -- I took a class with
3 them.

4 Q. Okay. And are you certified?

5 A. I don't -- I don't believe
6 there's an actual certification for it.

7 MR. KELLY: Objection, move to
8 strike, nonresponsive.

9 BY MR. LOTTERMAN:

10 Q. Okay. If you wouldn't mind
11 turning to the exhibit that was looked at
12 earlier, it's 246-1. All right? Are you on
13 the page?

14 A. Yes, sir.

15 Q. Okay. And if you wouldn't mind
16 turning to the well schematic on page 3.

17 A. Okay.

18 Q. Do you know who --

19 MR. KELLY: Excuse me, is that
20 the Mansdorfer?

21 MR. LOTTERMAN: No, no, this is
22 the information he received from
23 SoCalGas.

24 MR. KELLY: Okay, thanks.

25 --oOo--

1 BY MR. LOTTERMAN:

2 Q. Do you know whose notes those
3 are on page 3?

4 A. I do not know.

5 Q. Okay. Do you recall whether
6 you reviewed this information contained in
7 Exhibit 246-2 [sic] before you arrived at the
8 facility?

9 A. I can't recall for sure but I'm
10 sure I looked at it on my phone on the way
11 there.

12 Q. Okay. All right. Did you find
13 the information helpful?

14 A. Yes.

15 Q. There have been a number of
16 questions that counsel have asked you about
17 the -- your daily reports.

18 A. Yes, sir.

19 Q. I'm going to mark as a separate
20 exhibit to this deposition a copy of the
21 reports that has been used in earlier
22 depositions for Boots & Coots, but I want the
23 record to be clear on what copy you're
24 looking at, okay?

25 A. Okay.

1 Q. All right. And I'm going to
2 mark this as 248-2.

3 (Whereupon, Deposition
4 Exhibit 248-2, Halliburton Boots &
5 Coots Daily Operating Reports,
6 SCG02110313 - SCG04561502, was marked
7 for identification.)

8 BY MR. LOTTERMAN:

9 Q. All right. And for the record,
10 it was previously marked as Boots & Coots PMQ
11 242-1.

12 Now, when I go through this --
13 by the way, are these called DORs?

14 A. DORs, yes, sir.

15 Q. All right. I'm going to call
16 them that. When I go through these DORs, I
17 see your name on the first page, which is
18 October 25, 2015.

19 Do you see that?

20 A. Yes.

21 Q. Okay. And then the last one I
22 see you show up on is December 13, 2015.
23 Would you mind checking that for me?

24 A. I'm sorry, what date?

25 Q. December 13.

1 A. Okay. Okay.

2 Q. Do you see your name as the
3 report generator on that date?

4 A. Yes.

5 Q. Okay. And who began generating
6 the reports on December 14?

7 A. Oh. I don't know for sure.

8 Q. Take a look.

9 A. Oh, I'm sorry.

10 MR. KELLY: Objection, leading.

11 A. On the 14th, yes, Jim LaGrone.

12 BY MR. LOTTERMAN:

13 Q. Okay. So can we infer from the
14 fact that you stopped generating reports on
15 December 13 that that was the last day you
16 worked on the project?

17 MR. KELLY: Objection, leading.

18 A. Yes, because the next -- on the
19 next day I was traveling.

20 BY MR. LOTTERMAN:

21 Q. Okay. And where do you see
22 that?

23 A. On -- where it says Transit.

24 Q. All right. So to be clear, you
25 first set foot at the Aliso Canyon facility

1 on October 25th, 2015, right? Page 1.

2 A. Yes.

3 Q. Okay. And by December 14,
4 2015, you were in transit back to Houston.

5 A. Yes.

6 Q. Okay. I want you to turn to
7 the first page with me again. We're going to
8 walk through this a little bit to refresh
9 your recollection, okay?

10 If you go down to 1400 hours,
11 actually starting -- so it looks like you
12 took a flight that morning? Is that right?

13 A. Yes.

14 Q. Okay. And you grabbed a rental
15 car?

16 A. Yes.

17 Q. And then you drove from LAX to
18 the facility, right?

19 A. Yes.

20 Q. Okay. Do you see the entry for
21 1400 hours?

22 A. Yes.

23 Q. Did you write "Met with
24 SoCalGas Company representatives"?

25 A. Yes.

1 Q. Okay. Did you meet with the
2 SoCalGas representatives on the afternoon of
3 December [sic] 25th?

4 A. When I -- the representative, I
5 don't remember his name, but -- I'll call him
6 the company man. But the company man,
7 I guess they were people that were already in
8 the field, from what I remember.

9 Q. Okay. Was that meeting you're
10 referring to there a long, substantive
11 meeting?

12 A. No, I don't believe so. It's,
13 you know, typically you get there and meet
14 and -- you know --

15 Q. All right.

16 A. I don't recall any, like,
17 in-depth conversations.

18 Q. Good. Okay. Let's just take
19 this one step at a time. You see the next
20 step, it says "Traveled to Standard Sesnon 25
21 well site"?

22 A. Yes.

23 Q. I'm going to stay right in that
24 little paragraph for about five minutes,
25 okay?

1 All right. Did you travel to
2 the well site that day?

3 A. Yes.

4 Q. Do you recall what you saw?

5 A. I saw some wells and some
6 little cracks in the asphalt and a little gas
7 coming out of there.

8 Q. Could you hear the gas coming
9 out?

10 A. I don't believe -- I don't
11 recall hearing it.

12 Q. Could you smell the gas?

13 A. I don't recall smelling it.

14 Q. Okay. Did you -- let's take
15 this one step at a time.

16 Okay. So the next line says
17 performed site assessment. What does that
18 mean?

19 A. Basically just taking a visual
20 of what's -- what's there on location.

21 Q. Is that a fancy way of saying
22 you eyeballed it?

23 A. Pretty much.

24 Q. Okay. Did you examine the
25 wellhead itself?

1 A. At the time we just visually
2 looked at it.

3 Q. Did there come a point in time
4 when you checked to see whether the valves
5 were working?

6 A. Yes. I mean, there was a day
7 me and James got in there and operated the
8 valves and stuff like that, I recall.

9 Q. Did the surface equipment seem
10 in good condition?

11 A. As I recall, all the valves
12 opened and closed.

13 Q. Okay. And did you have an
14 opportunity to compare the schematic you
15 received to the wellhead you looked at?

16 A. Yes.

17 Q. Did the schematic appear
18 accurate to you?

19 A. Yes, from what I recall.

20 Q. Do you know what the phrase
21 "fit for purpose" means?

22 A. Yes.

23 Q. Okay. When you examined that
24 wellhead on October 25, 2015, did you believe
25 it was fit for purpose?

1 A. Yes.

2 Q. All right. Now, the next line
3 you say: Observed gas broaches to surface
4 through several fissures on well pad.

5 Do you see that?

6 A. Yes.

7 Q. And we talked about that
8 previously, right?

9 A. Yes.

10 Q. Okay. The next line says:
11 Discussed operations prior to broaching with
12 client representatives.

13 A. Yes.

14 Q. Do you remember that
15 discussion?

16 A. It would have been about the
17 bullhead.

18 Q. Okay. And the information you
19 received during that discussion, did it
20 differ at all from the information that
21 Mr. Kopecky sent you in that earlier e-mail
22 you looked at?

23 A. No, I don't recall any
24 differences.

25 Q. Okay. Do you recall whom you

1 met with from SoCalGas to talk about the
2 prior operations?

3 A. I don't recall his name.

4 Q. How about Alan Fortenberry?

5 A. That doesn't ring a bell.

6 Q. How about Todd Van de Putte?

7 A. I remember his name, yes.

8 Q. All right. Do you remember
9 anything about that discussion that you can
10 share with us today?

11 A. No, I don't recall anything
12 other than, you know, we pumped that fluid.

13 Q. Okay. And then if you look,
14 there's a couple of lines where you talk
15 about you were informed by the client,
16 et cetera, et cetera, you see that, and then
17 operations were discontinued.

18 Is that basically at least a
19 summary of what you were told at the Aliso
20 Canyon facility on October 25th, 2015?

21 A. Yes, it would have been a
22 summary.

23 Q. All right. That wasn't all you
24 were told?

25 A. No. I mean, I can't say it's

1 inclusive.

2 Q. Thank you. All right.

3 Now let's look at the next
4 line. It says: Began sourcing slick line
5 unit, frac tanks for kill fluid, dual pump
6 truck, and additional pump iron.

7 Do you see that?

8 A. Yes.

9 Q. Now, was that part of the
10 discussion you talked about earlier where you
11 ordered pumps and various equipment?

12 A. Was it a discussion that we
13 talked about previously?

14 Q. I'm trying to short-circuit
15 this, but let me take it one step at a time.

16 A. Oh.

17 Q. When you say you began sourcing
18 these items, what were you doing? What does
19 that mean?

20 A. So the discussion would have
21 been like, "What do you need?"

22 "Okay, we need pump trucks and
23 iron," you know, and then SoCal, through
24 their contractors, would have started making
25 phone calls.

1 Q. Did you ask for vacuum trucks?

2 A. Yes.

3 Q. What about cranes?

4 A. I don't know if we asked for a
5 crane that day.

6 Q. At some point in time?

7 A. Yeah, some point in time.

8 Q. Okay. What about wireline
9 services?

10 A. Yes.

11 Q. What about trucking services,
12 generally?

13 A. Those -- I mean, they would
14 have been needed.

15 Q. Looking back at the experience,
16 was SoCalGas able to provide the sources you
17 need -- needed to conduct the well kills that
18 you planned and executed?

19 A. Yes.

20 Q. When I go through these daily
21 reports, I tend to see morning meetings and
22 end-of-day meetings. Was that generally the
23 practice?

24 A. Yes.

25 Q. Okay. Who typically attended

1 the morning meetings? Just categories.

2 A. It would have been SoCalGas
3 representatives, you know, the E-Line -- the
4 electric line company, the flowback company,
5 the crane operator --

6 Q. And you?

7 A. And me and any contractors that
8 were involved in the operation.

9 Q. What was the purpose of the
10 morning meetings?

11 A. Oh, to discuss -- you know,
12 just discuss what was going to happen, you
13 know, in safety meetings and, you know, but
14 just a -- what to expect for the day.

15 Q. Did those expectations and
16 plans change from time to time?

17 A. From time to time.

18 MR. KELLY: Objection, vague.

19 BY MR. LOTTERMAN:

20 Q. Okay. I notice you also tended
21 to have what I believe you called end-of-day
22 meetings. What was the purpose of them?

23 MR. KELLY: Objection, calls
24 for speculation.

25 A. They would have been just,

1 again, you know, discussing the next day's
2 operation and what happened that day.

3 BY MR. LOTTERMAN:

4 Q. Did you feel that you had
5 sufficient access to SoCalGas'
6 decision-makers in those meetings and
7 elsewhere?

8 A. Absolutely.

9 Q. Okay. Did you interact with
10 DOGGR from time to time?

11 A. We had a few conversations.

12 Q. What was the main topics,
13 without getting into too much detail?

14 A. I think it was -- there was
15 DOGGR, and I believe it was, but, you know,
16 he was asking just -- you know, anything
17 that, you know, not mud, but anything else
18 that could be pumped into the reservoir to
19 seal the reservoir.

20 Q. So sounds like they were making
21 some suggestions?

22 MR. KELLY: Objection, leading.

23 A. They were asking questions.

24 BY MR. LOTTERMAN:

25 Q. Asking questions.

1 Did you attempt to answer those
2 questions?

3 A. I believe my answer was, you
4 know -- he was asking about something, I
5 don't remember what it was, but, you know,
6 the response was, "Well, we don't want" -- it
7 was along the lines of, "No, as far as like
8 sealing the -- we don't want to pump anything
9 that might seal something that will make it
10 worse, you know, in the wellbore." We don't
11 know where the holes are or the condition of,
12 you know, simple -- you know, put a finger
13 here, you don't want something popping out
14 over here (demonstrating).

15 Q. Okay. What role did you have,
16 if any, in managing site safety?

17 A. Not much, other than just
18 everybody has the right to stop work and
19 things like that.

20 Q. And as a general matter, was
21 work on the top kill, not the relief well,
22 limited to daylight hours?

23 A. Yes.

24 Q. Whose rule was that?

25 A. It's just a rule that, you

1 know, we like to not do operations like that
2 at night.

3 Q. You're speaking on behalf of
4 Boots & Coots?

5 A. Right.

6 Q. Why not?

7 A. It's just, you know, it's safer
8 during the day.

9 Q. What are the risks of working
10 at night?

11 A. Well, if you're working and,
12 you know, there was some kind of incident,
13 you know, you've got to shut down lights and
14 equipment and doing all that and, you know,
15 then trying to find people at night and --
16 you know, I guess visually, if something bad
17 happens at night, it can be worse.

18 Q. Was there a concern that if you
19 attempted to light up those areas at night
20 you may increase the ignition risk?

21 A. Yes.

22 Q. Okay.

23 MR. KELLY: Objection, move to
24 strike, leading.

25 --oOo--

1 BY MR. LOTTERMAN:

2 Q. Was there a practice while you
3 were there of removing and returning
4 equipment every day from the pad --

5 A. Yes.

6 Q. -- or at least certain
7 equipment?

8 A. Yes.

9 Q. Why would you do that?

10 A. Well, like the crane, you know,
11 you didn't want something to happen to it
12 overnight and it wouldn't be available the
13 next day. You know, just -- just remove it
14 so -- you know, just removing equipment just
15 to, you know, wanting to service stuff at
16 night and, you know, you just didn't want it
17 being around the well on the location
18 unattended.

19 Q. Were you involved at all with
20 the planning or spudding or implementation of
21 the relief well?

22 A. No. The only thing -- the only
23 thing I did for the relief well, they were
24 rigging up the rig and they asked me to go
25 over there and look at the rig-up of the

1 diverter line and choke manifold.

2 Q. Other than that, though, that
3 was someone else at Boots & Coots'
4 responsibility?

5 A. Yes.

6 Q. Who was that?

7 A. Our relief guys at the time,
8 John Hatteberg, Wayne Courville. I don't
9 know if -- I don't know if Jim was. I don't
10 remember who was out there.

11 Q. Who was in charge?

12 A. I would say it would have been
13 John and Wayne -- you know, John Wayne --
14 John Hatteberg and --

15 Q. Had he drilled a couple of
16 relief wells in his lifetime?

17 A. Yes.

18 Q. Okay. Pretty qualified?

19 A. Yes.

20 Q. Okay. Was weather a challenge
21 while you were at the Aliso Canyon facility?

22 A. Yes. I mean, there was days, I
23 remember early on the -- you know, we set up
24 a bunch of tents to have meetings and stuff,
25 and the wind blew them over. And then, you

1 know, there was days if the wind direction
2 wasn't right, you couldn't drive up the road
3 to the -- to the pad. You had to wait for
4 the wind to be right to blow any gas away
5 from you.

6 Q. Were there days when it was too
7 windy to work?

8 A. Yes, I believe so. If it's
9 over a certain mile -- I don't know what it
10 was, but if the wind is so high the crane
11 won't rig up.

12 Q. Did the weather conditions
13 cause delays in killing the SS-25?

14 MR. KELLY: Objection, vague,
15 lacks foundation, calls for
16 speculation.

17 A. I recall there was times and
18 days where we couldn't do anything on-site.
19 I don't recall if it was before or after the
20 kill, but, yeah, there was stoppages.

21 BY MR. LOTTERMAN:

22 Q. Okay. I want to ask you about
23 smelling -- the smells you noticed while you
24 were there. Are you familiar with the smell
25 of natural gas?

1 A. Yes.

2 Q. Okay. Do you realize it has
3 mercaptans in it, which gives it a smell?

4 A. Right, yes.

5 Q. Okay. Did you smell mercaptans
6 or natural gas outside of the Aliso Canyon
7 facility while you were working that project?

8 A. No.

9 MR. KELLY: Objection. Can you
10 slow down just a little, please?

11 Objection, vague.

12 BY MR. LOTTERMAN:

13 Q. Okay. Answer?

14 A. No.

15 Q. Let's go back to the daily
16 reports, if you would, sir, and I want you to
17 turn to the report dated 10/28.

18 A. That's October, right?

19 Q. Correct.

20 A. Yeah. Yep.

21 Q. And I want to direct your
22 attention to the entry at 1700 hours.

23 A. At 1700, okay.

24 Q. Do you see that?

25 And did you write -- did you

1 write that entry?

2 A. Yes.

3 Q. What does it mean, "Ran in hole
4 with sample bailer. Tagged hard at 465 [sic]
5 feet. Pulled out of the hole. Secured
6 well"?

7 A. So the sample bailer is just a
8 tool that, you know, you lower it in the well
9 with the slick line and it catches anything
10 in the well that might be there. And then as
11 we were running it in the hole, we just
12 (demonstrating) -- you know, tagged hard.
13 It's just, you know, you run it in, just
14 (demonstrating) -- sit down on something.

15 Q. Does tag mean blockage, you
16 couldn't go any farther with the tool?

17 A. Yeah, we couldn't go any
18 further with the tool.

19 Q. Okay. And is it your testimony
20 that that entry denotes the time when Boots &
21 Coots noticed a blockage or hydrate in the
22 tubing at SS-25?

23 A. Yes.

24 Q. Okay. And let's talk a little
25 bit about your efforts to remove that

1 blockage.

2 Did you need a coiled tubing
3 unit?

4 A. We ended up using one, yes.

5 Q. Okay. And are those units
6 typically operated with internal combustion
7 engines?

8 A. Yes.

9 Q. Okay. Was that a viable unit
10 to run at Aliso Canyon?

11 A. Yes.

12 Q. Okay. But was there an
13 ignition risk at Aliso Canyon?

14 MR. KELLY: Objection, leading.

15 A. I mean, I guess if there's gas,
16 there, you know, it's something we always
17 think about, but we mitigate it by putting it
18 upwind or things like that.

19 BY MR. LOTTERMAN:

20 Q. I guess what I'm wondering is,
21 did you have to search for an electrical
22 powered unit to perform the coiled tubing at
23 the Aliso Canyon facility?

24 A. Did we have to, no.

25 Q. Okay.

1 MR. KELLY: Move to strike,
2 interpose the objection, leading.

3 BY MR. LOTTERMAN:

4 Q. Did you need a DOGGR permit to
5 do that work?

6 A. I don't recall if we needed to
7 get one or not.

8 Q. And let's make sure the record
9 is clear again. If you wouldn't mind turning
10 to November 6 at 10:00 o'clock.

11 A. Uh-huh.

12 Q. And if you look right at the
13 bottom of that paragraph, it reads: Found
14 bottom of hydrate plug at 188 feet,
15 et cetera.

16 Was that the moment when the
17 hydrate was cleared?

18 A. Yes.

19 Q. Okay. Did you use a glycol to
20 clear it?

21 A. Yeah, it shows we pumped some
22 glycol.

23 Q. Are you referring to the
24 9:00 o'clock entry, a.m.?

25 A. Yes.

1 Q. Okay. All right. Let's go to
2 the -- let's go to November 8, 2015.

3 A. November 8?

4 Q. Uh-huh.

5 A. Okay.

6 Q. I believe you answered some
7 questions earlier about running diagnostics.

8 A. Uh-huh. Yes, sir.

9 Q. Were those diagnostics run on
10 November 8?

11 A. Yes.

12 Q. Did it include temp logs?

13 A. Yes.

14 Q. Noise logs?

15 A. Yes.

16 Q. Do you recall what those logs
17 showed?

18 A. I do. The -- I remember that
19 the tools at -- I don't remember the depth,
20 but there was a time where the tools quit
21 sending signals to the -- to the electric
22 line truck at some interval.

23 But there was a cooling
24 around -- it was hard -- it was hard because
25 the tools weren't reading, but yes, there was

1 a cooling -- I want to say it was like
2 800 feet or something, but there was a range
3 in there where the temperature got cool --
4 cold.

5 Q. As a general matter, did the
6 temp and noise logs that were conducted on
7 November 8, 2015, provide you with any
8 clarity as to the wellbore integrity?

9 A. It wasn't clear enough to say,
10 oh, there's a hole here at this depth.

11 Q. Okay. Was it clear enough to
12 tell you what the size of the hole was?

13 A. No.

14 Q. Was it clear enough to tell you
15 what effect, if any, the hole had on the
16 nearby formation?

17 A. No.

18 Q. Was it clear enough to tell you
19 what the flow path was of the leak?

20 A. No.

21 Q. Was it clear enough to inform
22 you as to what the flow rate was from that
23 leak?

24 A. No.

25 Q. These were all unknowns, right?

1 A. All unknowns.

2 Q. All right. Did the noise and
3 temp logs tell you about the condition of the
4 tubing?

5 A. No.

6 Q. Is that why you set the bridge
7 plug?

8 A. Yes.

9 MR. KELLY: Objection, leading.

10 BY MR. LOTTERMAN:

11 Q. You talked about some of the
12 simulation or modeling you did after the
13 second kill with opposing counsel. I want to
14 follow up with some questions on that.

15 What program did you use?

16 A. Drillbench.

17 Q. Okay. Is that standard at
18 Boots & Coots?

19 A. Yes.

20 Q. Now, I believe it was in
21 response to Mr. Kelly's questions, you were
22 talking about the range of million cubic feet
23 per day that you plugged into the model.

24 Do you remember that?

25 A. Yes.

1 Q. And did I hear you correctly
2 that you said the range was from 30 to
3 70 million cubic feet per day?

4 A. Yes. I know I -- I know I did
5 60 and 70.

6 Q. Okay. All right.
7 When you were asked earlier
8 about why you set the plug and why you left
9 open the possibility of cutting the tubing,
10 you said it was best practices.

11 What did you mean by that?

12 MR. KELLY: Objection, leading.

13 A. By -- when you set a plug?

14 BY MR. LOTTERMAN:

15 Q. Yes.

16 A. Before you cut the tubing or
17 part it, you know, you set plugs in the pipe
18 below it just to keep the reservoir fluids
19 and pressures from coming up the tubing, you
20 know.

21 MR. KELLY: Objection, move to
22 strike, lacks foundation, calls for
23 speculation.

24 BY MR. LOTTERMAN:

25 Q. Have you done that before on

1 other blowouts?

2 A. Yes.

3 Q. Okay. All right. Would you
4 pull out Exhibit 242-12.

5 MR. KELLY: What is that,
6 please?

7 MR. LOTTERMAN: It was that
8 CPUC response.

9 MR. KELLY: Oh, okay.

10 BY MR. LOTTERMAN:

11 Q. This is what it looks like.

12 A. Right. Yes, sir.

13 MR. KELLY: 240?

14 MR. LOTTERMAN: 2-12.

15 BY MR. LOTTERMAN:

16 Q. All right. I want you to turn
17 to the second page, sir.

18 A. Yes.

19 Q. And I want you to put that page
20 right in front of you, okay? Because I want
21 to use that page as a reference as we walk
22 through what you did, okay? And I want to
23 start with item 2, which is the November 13
24 kill.

25 Do you see that?

1 A. Yes, sir.

2 Q. Okay. And I don't want to talk
3 about what this document says was done. I
4 just want to make sure we're talking about
5 the same well kill, okay?

6 A. Okay.

7 Q. All right. I'm going to mark
8 as Exhibit 248-3 a one-page document bearing
9 Bates stamp HAL_400.

10 (Whereupon, Deposition
11 Exhibit 248-3, "Kill Procedure, SS-25,
12 Nov. 12, 2015," HAL000400, was marked
13 for identification.)

14 BY MR. LOTTERMAN:

15 Q. Let me know when you're ready
16 to talk about it.

17 A. Okay.

18 Q. Okay. Have you seen this
19 document before today?

20 A. Yes.

21 Q. What is it?

22 A. It's the program for the
23 pump -- pumping we were going to do that day.

24 Q. Okay. Who typically prepared
25 these?

1 A. I did.

2 Q. Okay. And this one is dated
3 November 12, 2015.

4 Do you see that?

5 A. Yes.

6 Q. Would that be the program for
7 the kill shown as number 2 up top of November
8 13, 2015?

9 A. Yes.

10 Q. Okay. And bullet 1 talks about
11 600 barrels of 9.4 ppg calcium chloride.

12 Do you see that?

13 A. Yes.

14 Q. Okay. And then if you look,
15 skip down to item 5, what's item 5?

16 A. Set EZSV.

17 Q. Okay. Is that the bridge plug?

18 A. Yeah. Yes.

19 Q. Okay. Is EZSV a type of bridge
20 plug?

21 A. Yes. It's the name of the
22 model.

23 Q. Okay. How is that set?

24 A. It was set on electric line.

25 Q. Okay. How was it -- how does

1 it have to be removed?

2 A. You can drill them.

3 Q. Okay. Can you remove it by
4 wireline?

5 A. I don't know if this one -- I
6 think it had to be drilled, milled.

7 Q. Okay. When you say milled, you
8 mean sending something down to the bottom of
9 the wellbore and drilling it out?

10 A. Yeah.

11 Q. Okay. And then if you look at
12 item 9, it says: Perform negative test on
13 the plug at 500 psi below tubing pressure.

14 Is that the tubing integrity
15 test you were talking about earlier?

16 A. Yes.

17 Q. Okay. And then if you look at
18 item 13, it talks about perforating the
19 tubing.

20 Do you see that?

21 A. Yes.

22 Q. What was the purpose of
23 perforating the tubing above the bridge plug?

24 A. So we could circulate -- pump
25 fluids down the tubing and into the annulus.

1 Q. And was the thought of that to
2 replace the subsurface safety valve slots
3 that you were basically plugging off?

4 A. Yes. I mean, we had to have a
5 way to circulate.

6 Q. Right. How did you decide how
7 many perforations to make?

8 A. I don't recall if it was the
9 amount, you know -- the amount the gun held
10 at -- you know, that he could do.

11 Q. Okay. And is the number of
12 shots and the size of the perforations
13 important?

14 A. Yes.

15 Q. Why?

16 A. For, you know -- you know, it
17 affects pressure and you just get a pressure
18 drop across the holes.

19 Q. And if you look at -- I'm going
20 to skip 16 and 17 because we'll look at what
21 you actually did in a minute.

22 Let's look at item 18. It
23 says: Increase pump rate according to pump
24 pressure, max pump pressure 4,000 psi.

25 What does that mean?

1 A. You could increase the pump
2 rate up to 4,000 psi.

3 Q. And could you go beyond that?

4 A. That was our safety factor, you
5 know, just -- you know, it's a practice not
6 to go right up to working pressure,
7 especially on -- you know, we didn't know the
8 condition -- the condition of everything.

9 Q. And why did you choose calcium
10 chloride?

11 A. Like I said, it was what -- you
12 know, it was the same mud system that was
13 used in the wells in the field.

14 Q. And why did you choose 9.4
15 pounds per gallon?

16 A. It was -- I don't recall if
17 they said that was, you know -- it was the --
18 you know, it was more than bottomhole
19 pressure. It was what they -- you know,
20 I guess hadn't killed for the other wells.

21 Q. All right. So now let's go to
22 the actual kill itself, and I believe, if
23 this chart is right, that occurred on
24 November -- before we go there. So if you
25 look at the entry -- let's go to the daily

1 reports, okay?

2 A. Okay.

3 Q. I don't know which copy you're
4 looking at, but let's go to November 12.
5 We're going to take this chronologically.

6 MR. KELLY: Excuse me, can I
7 have the other exhibit that you're not
8 looking at? Yeah.

9 BY MR. LOTTERMAN:

10 Q. So do you see the daily report
11 for November 12, Mr. Walzel?

12 A. Yes.

13 Q. Okay. And does that basically
14 outline the work that was done on that date
15 to set the bridge plug --

16 A. Yes.

17 Q. Okay. And in fact, does it
18 indicate that 11:15 a.m. on that date, the
19 bridge plug was set at 8,393 feet?

20 A. Yes.

21 Q. All right. Now let's look at
22 the kill itself on the next day, so turn to
23 November 13, 2015.

24 A. Okay.

25 Q. And is it your testimony that

1 this summary of activity on-site for that day
2 is at least -- is as accurate as possible as
3 to what was done on that date?

4 A. Yes.

5 Q. Okay. Can you tell us very
6 briefly what you did?

7 A. We started pumping the mud and
8 brine and -- yeah, we just -- we pumped the
9 mud and up to 8 barrels a minute and the pump
10 pressure was 1500, and started seeing --
11 okay, yeah, this was when the gas was coming
12 up. The gas increased, you know, it was
13 coming up (demonstrating) around the trucks
14 and -- and then we pumped --

15 Q. Did you do a junk shot next?

16 MR. KELLY: I don't think he
17 was finished. Were you finished?

18 THE WITNESS: Yeah, we pumped
19 600 and -- 693 barrels and then
20 10 barrels of the polymer pill, and
21 spotted down there, tubing pressure
22 was zero, and we showed 192 on the
23 7-inch and 92 on the 11?, and then it
24 says we pumped junk shots.

25 --oOo--

1 BY MR. LOTTERMAN:

2 Q. Okay. And we've talked about
3 that. I just want you to summarize in one
4 sentence what happened during that well kill
5 on that date.

6 A. One --

7 Q. One sentence.

8 A. Okay. Yeah, we pumped the
9 fluid and, you know, I do -- I recall there
10 was, you know, the gas increased coming up
11 through the cracks, and I don't know if I
12 noted it on this one, if the flow stopped
13 briefly. It must have been the next one.

14 Q. Okay. Did you shut down early?

15 A. I believe we did.

16 Q. Did you regroup?

17 A. Yes.

18 Q. Did you learn anything from
19 that attempt?

20 A. Well, we learned the more
21 you -- seemed like the faster you pumped, the
22 more gas was coming out of the cracks.

23 Q. What does that mean?

24 A. We were displacing --
25 displacing the gas faster.

1 Q. Is it unusual in your business
2 to not kill a blowout on the first attempt?

3 A. Yes. I mean, it happens.

4 Q. All right. Let's mark as
5 Exhibit 248-4 a single-page document bearing
6 Bates stamps HAL_389.

7 (Whereupon, Deposition
8 Exhibit 248-4, "Barite Pill, November
9 14, 2015," HAL000389, was marked for
10 identification.)

11 BY MR. LOTTERMAN:

12 Q. Do you recognize this document?

13 A. Yes.

14 Q. What is it?

15 A. A recipe for barite pills.

16 Q. Is this also part of one of
17 your programs, as you called them?

18 A. It was either a recipe I got
19 out of an MI mud manual or a Baroid recipe.

20 Q. Why did you decide to put a
21 barite pill into the wellbore?

22 A. The first -- the first kill, we
23 used this polymer pill, which I guess was
24 common practice in other wells in the field.
25 And the barite, you know, is an 18-pound mud,

1 but the idea was to get the barite to fall
2 out and plug up the bottom of the well.

3 Q. Now, when you talk about a
4 common practice in the field, are you saying
5 that, at least on the first well attempt, you
6 tried to do what SoCalGas typically did at
7 the Aliso Canyon facility?

8 A. Yeah. The polymer pill they
9 said was a good plug, you know, we call it a
10 plug, kept -- kept kill fluids in the
11 wellbore.

12 Q. Whose idea was the barite?

13 A. I believe I mentioned that or,
14 you know, recommended it.

15 Q. Everyone agree?

16 A. Yes. Everything had to be
17 approved, you know, through SoCal.

18 Q. Okay. Why did you continue to
19 use a solids-free kill fluid in a brine and
20 fresh water?

21 A. Well, if my timeline is right,
22 the first one we pumped, and I think we shut
23 down and I believe it was after the second
24 one was when the flow stopped for a little
25 bit. And then it must have been the third

1 one, we kept the same fluid and just tried to
2 get as -- a faster rate.

3 But initially, you know,
4 I guess one of the benefits of the clear
5 fluid, it would have been a little less
6 abrasive on any tubulars that might have been
7 damaged.

8 Q. Would a less abrasive fluid
9 been less likely to damage the surrounding
10 formation?

11 A. Well, brine would be less
12 damaging to the formation, you know, the
13 reservoir.

14 Q. How did you expect the barite
15 to settle when -- or how does one expect
16 barite to settle when a well is flowing like
17 this one did?

18 A. Well, the -- I guess you call
19 it the theory behind it, it would have been
20 dead, dynamically dead by the time we spot it
21 down on the bottom. Or the barite, you know,
22 falls out and plugs up any flow.

23 Q. Okay. Now let's turn to
24 November 15, 2015, two days later. Are you
25 on that page?

1 A. Yes.

2 Q. Was that Boots & Coots' next
3 well kill attempt?

4 A. Yes.

5 Q. Did you keep the fluid weights
6 the same?

7 A. Yes.

8 Q. Did you attempt a barite pill
9 again?

10 A. I believe so.

11 Q. Okay. Did a crater begin to
12 form around the wellhead?

13 A. Well, it says: Flow from
14 fissures stopped briefly and then began
15 flowing gas at 12 --

16 Q. All right, so --

17 A. So I don't know, I don't recall
18 if on this one is when the crater started
19 forming or the cracks just got bigger.

20 Q. All right. So tell the jury
21 what happened during this pump kill on
22 November 15. Just in two sentences or less.

23 MR. KELLY: Objection,
24 restrictive.

25 A. Okay. Yeah, this was the one

1 where we pumped and then after we shut the --
2 I remember the flow from the well was -- the
3 gas flow was, you know, decreased throughout
4 the job. And then after we pumped the --
5 I guess we got 19 barrels out of the tank on
6 this one, barite, shut -- when we turned the
7 pumps off to monitor the flow, it stopped for
8 a short period of time.

9 BY MR. LOTTERMAN:

10 Q. But the flow picked up again?

11 A. Yes. I remember it kind of
12 bubbled a few times and then increased and
13 came back.

14 Q. Any lessons learned from that
15 attempt?

16 A. Ah. I mean, it showed that,
17 you know -- well, either the gas was coming
18 from the reservoir or the gas that was
19 exiting out of the hole, you know, it was --
20 it unloaded some gas that was in that
21 formation, you know, unloaded up from the top
22 of the hole and then the well came back in.

23 Q. Okay. Between well kill
24 attempts, would you typically perform
25 diagnostic work?

1 A. I don't believe we ran any more
2 noise/temperatures because -- I don't think
3 we did, because -- yeah. No, I don't think
4 we did because, you know, the first time we
5 ran them, you know, it was cold and the tools
6 didn't work.

7 Q. Okay. Let's mark as
8 Exhibit 248-5 a two-page document bearing
9 Bates stamps HAL_387 and 388.

10 (Whereupon, Deposition
11 Exhibit 248-5, "Barite Pill, November
12 15, 2015," HAL000387 - 388, was marked
13 for identification.)

14 MR. LOTTERMAN: And while we're
15 at it, we'll add 248-6.

16 (Whereupon, Deposition
17 Exhibit 248-6, "Barite Pill, November
18 15, 2015," SCG2425994, was marked for
19 identification.)

20 MR. LOTTERMAN: Which bears
21 Bates stamp number SCG2425994.

22 MR. KELLY: Wait, were these
23 two separate exhibits?

24 MR. LOTTERMAN: Two separate
25 exhibits.

1 BY MR. LOTTERMAN:

2 Q. So do me a favor, Mr. Walzel,
3 and put those two in front of you. I've got
4 248-5 and 248-6.

5 A. Okay.

6 Q. Do you recognize these
7 documents?

8 A. Yes.

9 Q. What are they?

10 A. Programs for the pump
11 procedure.

12 Q. Okay. By the way, would you
13 typically share these with SoCalGas before an
14 attempt?

15 A. Yes.

16 Q. All right. And did you prepare
17 these two documents?

18 A. Yes.

19 Q. Okay. And can you explain to
20 us what the plan was for this kill attempt?

21 A. So this one -- these are the
22 same day?

23 Q. Well, I think the programs are
24 dated the same day. If you look on the
25 chart, the next kill was November 18.

1 Do you see that?

2 A. Okay.

3 MR. KELLY: Where are you
4 pointing to, Counsel?

5 MR. LOTTERMAN: I'm going to
6 let him clarify.

7 MR. KELLY: Well, you're
8 instructing the witness about
9 documents. I'd like to know what
10 you're instructing him.

11 MR. LOTTERMAN: He didn't see
12 it, you don't see it.

13 MR. KELLY: I don't see it.

14 BY MR. LOTTERMAN:

15 Q. Go ahead, please.

16 A. So this one --

17 MR. KELLY: Just a second. If
18 you're identifying things to the
19 witness --

20 BY MR. LOTTERMAN:

21 Q. Mr. Walzel -- Mr. Walzel, what
22 are the dates of Exhibit 248-5 and
23 Exhibit 248-6?

24 A. November 15th.

25 Q. Okay. And can you explain to

1 the jury what the plan was for these
2 particular well kills?

3 A. It was -- okay. Yes, the same,
4 pump the calcium chloride, and then
5 contingencies of pumping -- yeah. It was the
6 well kill, so this would have been the one
7 after the flow had stopped. So it was --
8 yeah. I mean, it's just an outline of the
9 program we had to pump this job.

10 Q. Okay. And to be clear, was
11 this the program for the well kill done on
12 November 15 or for the well kill done on
13 November 18? And if you would refer to your
14 daily reports, I'd appreciate it.

15 (Document review by witness.)

16 A. The 15th and the 18th?

17 BY MR. LOTTERMAN:

18 Q. I'm asking you which programs
19 these two documents were for, the kill on the
20 15th or the kill on the 18th?

21 A. Okay. So this one looks like
22 it was for the 18th.

23 Q. Okay. So --

24 A. And a larger barite pill.

25 Q. Give me the document number,

1 sir.

2 A. Oh, I'm sorry.

3 Q. Verbally.

4 A. Okay. Ending in 387-1.

5 Q. All right. So you're referring
6 to Exhibit 248-5, right?

7 A. Yes, I'm sorry, wrong number.

8 Q. That's fine. No, no. I
9 realize this is your first deposition.

10 So is it your testimony that
11 the program showed on Exhibit 248-5 was for
12 the well kill that occurred on November 18,
13 2015?

14 A. Yeah, I believe it was.

15 Q. So tell us what happened during
16 the well kill on November 18.

17 A. What number is this that we
18 did?

19 Q. This would be number 3. We've
20 gone through November 13, November 15, and
21 now we're on November 18.

22 MR. KELLY: Objection. Object
23 to counsel testifying.

24 BY MR. LOTTERMAN:

25 Q. I guess what I'm wondering is,

1 can you tell from the daily reports, sir?

2 A. That's what I'm looking at.

3 Q. Oh, I see. Okay. I gotcha.

4 My apologies.

5 A. This looks like we started
6 pumping, and soon after we started pumping,
7 after 45 barrels, the gas increased at the
8 surface.

9 (Document review by witness.)

10 A. It appears we didn't pump as
11 much of the 9.4 because the winds were
12 shifting, and then we ended up pumping
13 35 barrels of the 18-pound barite pill.

14 So just from reading this, it
15 looks like the weather conditions changed.

16 BY MR. LOTTERMAN:

17 Q. Okay. Do you have any
18 independent recollection of that attempt?

19 A. I don't.

20 Q. All right. Let's mark as

21 248-7 --

22 A. Oh, I don't know if you want me
23 to keep talking about -- but this is the one
24 where we moved the equipment up the hill,
25 pumping equipment.

1 Q. Do you know why?

2 A. Yeah, because the -- the amount
3 of gas that was coming -- and I guess maybe
4 because of the crater, but it was safer to,
5 you know, just get it out of the -- off
6 location and put it up the hill.

7 MR. KELLY: Move to strike,
8 nonresponsive.

9 BY MR. LOTTERMAN:

10 Q. Okay. You can put that one
11 down, sir. I've now marked as Exhibit 248-7
12 a two-page document bearing Bates stamps
13 SCG2125865 and 866.

14 (Whereupon, Deposition
15 Exhibit 248-7, E-mail from Walzel to
16 Lane, 11/23/2015, and Attachment;
17 SCG02125865 - 2125866, was marked for
18 identification.)

19 (Document review by witness.)

20 BY MR. LOTTERMAN:

21 Q. Do you recognize this document?

22 A. Yes.

23 Q. What is it?

24 A. The program for 11/24.

25 Q. Okay. And if you'll look at

1 the chart that we're using, the list of
2 kills, there appears to be one on 11/24/2015?
3 Do you see that?

4 I think you've lost that page.
5 It's okay. You know what, I'll sort it out.

6 So tell me what you were trying
7 to do on the program dated November 24, 2015.

8 A. Well, kill the well.

9 Q. All right.

10 A. So we started off with fresh
11 water, trying to pump it up to 15 barrels a
12 minute to slow the flow down. Started with
13 the 9.4 calcium chloride -- sorry, I'm going
14 backwards.

15 Q. Tell you what, why don't you
16 take a moment to review it.

17 A. Okay. Yeah, it's been a long
18 time.

19 Q. I understand. Take a moment to
20 review it quietly and then maybe you can
21 summarize for us what you did.

22 (Document review by witness.)

23 BY MR. LOTTERMAN:

24 Q. Let me know when you're ready.

25 A. Okay. So I kind of remember.

1 Yeah, so we had the -- pumped a thousand
2 barrels of fresh water up to 15, and then we
3 had to mix some polymer sweeps. That would
4 have been the -- I believe that was the
5 gelled pills or whatever for LC -- you know,
6 lost circulation.

7 And then we pumped a thousand
8 barrels of water, 500 barrels of the calcium
9 chloride and then a barite pill.

10 Q. Okay. So a couple of questions
11 for you. Number one, why use lost
12 circulation material here?

13 A. It would have been to -- if we
14 were losing any to the formation to, you
15 know, try to heal that up while we were
16 pumping.

17 Q. Okay. Second question, what
18 was different about this program from the
19 earlier ones we looked at, if anything?

20 A. Well, it looks like the LCM
21 pills were different, the sweeps.

22 Q. Okay. Now let's turn to the
23 kill itself. Let's look at November 25th --
24 I'm sorry, November 24, 2015. Do you have
25 that daily report?

1 A. November 24th?

2 Q. Yes. All right. So do me a
3 favor, take a moment to review that and then
4 I have some questions for you.

5 (Document review by witness.)

6 A. Okay. This one --

7 BY MR. LOTTERMAN:

8 Q. Hold on. All right. So I
9 didn't have -- there wasn't a question
10 pending.

11 A. Oh, I'm sorry.

12 Q. I want to make sure we move
13 along here as efficiently as possible.

14 So explain what Boots & Coots
15 did in the kill attempt on November 24, 2015.

16 A. This one, we mixed -- we had
17 the LCM pills. There was the GEO Zan polymer
18 pill loaded with LCM and the barite pill
19 ready to go. Pumped the water, and then I
20 believe this was the fastest we pumped on
21 this one, you know, and that was part of
22 getting everybody away.

23 Got up to 13 barrels a minute,
24 which was the pump pressure of 4,167, which
25 was right around, you know, the limit of

1 the -- that we had set for max.

2 Q. And what happened?

3 A. With -- what happened to what?

4 Q. What happened to the kill
5 attempt?

6 A. Well, we finished pumping and
7 the pump pressure went to zero, but I
8 remember on this one, you know, the -- how
9 much mud did we pump?

10 (Document review by witness.)

11 A. Okay. From the report, I
12 remember the well was moving around a lot
13 (demonstrating), and I didn't know -- I don't
14 have anything noted in here as far as pumping
15 the brine, so, you know, due to the -- from
16 what I recall doing from the movement of the
17 well, you know, and how much it was moving,
18 we -- looks like we cut the operations.
19 Maybe we didn't do the pill because there was
20 worry about, you know, losing the wellhead.

21 (Whereupon, Deposition
22 Exhibit 248-8, "Well 25 Kill Program,
23 11-25-15," HAL000399, was marked for
24 identification.)

25 --oOo--

1 BY MR. LOTTERMAN:

2 Q. All right. Let's mark as
3 Exhibit 248-8 a one-page document bearing
4 Bates stamp HAL_399.

5 Do you recognize this document?

6 A. Yes.

7 Q. What's its date?

8 A. 11/25/15.

9 Q. Okay. Is this another kill
10 program?

11 A. Yes.

12 Q. Okay. And what was the plan
13 here?

14 A. The plan was using the LCM
15 again, and, you know, the barite pill and
16 then following it with a junk shot. But on
17 this -- I guess if you asked -- am I still
18 answering the question, what happened?

19 Q. Yes, sir.

20 A. So this one, we actually pumped
21 the LCM and the mud and -- okay. We started
22 with -- we did the water, then we started
23 pumping the mud. And looks like then we
24 started pumping -- and after 20 barrels,
25 slowed down to 2 barrels a minute and --

1 yeah.

2 And so the well was moving
3 around a lot, so looks like we stopped the --
4 slowed the pumps down. And this is where it
5 was moving so much that the flow line from
6 the 7-inch tubing had broke and the nipple on
7 the wellhead broke and the pump line on the
8 7-inch casing head broke. And then we had to
9 build some extension handles, and me and
10 James went and shut the valves on the tree.

11 Q. Okay. And in answering that
12 last question, were you referring to the
13 daily report?

14 A. Yes.

15 Q. Were you referring to the daily
16 report dated November 25th, 2015?

17 A. Yes.

18 Q. Okay. Now, I notice, for
19 example, if you stay with that report, I
20 notice on the bottom of some of these reports
21 you talk about relief well plans and
22 presentations and the like.

23 A. Right.

24 Q. Were those entries that you
25 made on this report?

1 A. Yes.

2 Q. Were they provided to you by
3 someone else?

4 A. Well, I knew -- I knew John and
5 them were working, you know, on that, so I
6 put it on there.

7 Q. Okay. So, for example, if
8 you'd turn back to November 18, 2015.
9 November 18, 2015.

10 A. Yes.

11 Q. Is it your testimony on the
12 bottom of that page that Boots & Coots
13 Houston prepared preliminary relief well
14 plots and submitted them to SoCalGas?

15 A. Yes. I believe that's when --
16 yes.

17 Q. Okay. And if you'd turn ahead
18 to December 4, 2015.

19 A. December 4?

20 Q. Please.

21 A. Yes.

22 Q. You see an entry, "Plan to spud
23 relief well tonight"?

24 A. Yes.

25 Q. Did you put that entry in?

1 A. Yes.

2 Q. Okay. Look at the next day,
3 December 5th, 2015, bottom of the activities
4 summary. Do you see where it says "Relief
5 well drilled to plus or minus 360 feet"?

6 A. Yes.

7 Q. Did you put that entry in?

8 A. Yes.

9 Q. Are both those accurate?

10 A. It's my best recollection.

11 Q. So does this refresh your
12 recollection as to whether the relief well
13 spudding started before or after you left
14 this project?

15 A. Okay. It must have started
16 before.

17 Q. Okay. Well, I don't want your
18 speculation. I want you to look at these two
19 daily reports and tell me if you were on-site
20 on December 4 and December 5.

21 A. I was on -- I was on the SS-25
22 site.

23 Q. Right.

24 A. And -- okay. So, yeah, they
25 must have spudded, you know, reported that so

1 I put it in a report.

2 MR. KELLY: Are you speculating
3 or is that your testimony?

4 THE WITNESS: No, I mean that's
5 what I put in the report, so the best
6 of my recollection, that would be
7 accurate.

8 MR. KELLY: Thank you.

9 BY MR. LOTTERMAN:

10 Q. So we've gone through a kill on
11 November 13, November 15, November 18,
12 November 24 and November 25, and were you
13 involved with all of them?

14 A. Yes.

15 Q. Okay. And once the kill was
16 done on the last one, on November 25, 2015,
17 where were you as far as what your next
18 approach was for the next well kill?

19 A. After the one on the 25th?

20 Q. Yes, sir.

21 A. You know, at that time it
22 was -- the best I recall, we were just, you
23 know, monitoring the activities on the 25 pad
24 at that time.

25 Q. So what did you do between that

1 kill on November 25, 2015, and your leaving
2 on December 14, 2015?

3 A. Looks like we cleaned --
4 monitored LELs and began cleaning up
5 location.

6 Q. Okay. Did a new team come in
7 at that point?

8 A. It looks like on the 6th there
9 was -- yeah. They were -- well, Richard --
10 Richard -- yes. Richard -- well, looks like
11 Richard traveled there that day.

12 Q. Okay. Let's mark as
13 Exhibit 248-9 a two-page document bearing
14 Bates stamps SCG2125845 and 846.

15 (Whereupon, Deposition
16 Exhibit 248-9, E-mail Chain ending
17 with E-mail from Clayton to Walzel,
18 11/28/2015; SCG02125845 - 2125846, was
19 marked for identification.)

20 (Document review by witness.)

21 BY MR. LOTTERMAN:

22 Q. Have you had a chance to review
23 Exhibit 248-9?

24 A. Yes.

25 Q. Okay. And is this an e-mail,

1 at least the top one, that you sent to
2 Mr. LaGrone and Mr. Kopecky and others on
3 November 28, 2015?

4 A. I didn't send it. Danny
5 Clayton did.

6 Q. Oh, I'm sorry. You're right.
7 Is this something that Danny Clayton sent to
8 you?

9 A. Yes.

10 Q. And you recall receiving it?

11 A. I don't -- yes.

12 Q. All right. Any reason to
13 believe you didn't receive it?

14 A. I didn't know.

15 Q. Got it. Understood. I
16 understand this has been a while ago.

17 So here's my question: I'm
18 reading the top paragraph. It says: Wasn't
19 copied but will take the liberty to reply.
20 That has been my plan all along. No one
21 outside of me and Danny would buy off on it.
22 Was saving Flow Chek as last option as it is
23 risky.

24 What's Flow Chek?

25 A. It's just a product to -- it's

1 a product you can -- you can stop flow with
2 it.

3 Q. Why is it risky?

4 A. Well, it goes -- I guess --
5 I guess -- I don't know what he was meaning,
6 but, you know, we talked about pumping a lot
7 of things and, you know, as everybody
8 involved didn't want to pump anything that,
9 you know, might plug up the hole. You know,
10 if it plugged up the hole up top or
11 something, we might make another hole down
12 below if there was a weak link, as best I can
13 recall.

14 MR. KELLY: Move to strike,
15 speculation.

16 BY MR. LOTTERMAN:

17 Q. Do you recall discussing the
18 Flow Chek option with Danny Clayton?

19 A. I don't recall any
20 conversations with him. We discussed a lot
21 of different things to pump.

22 Q. Sure. That was my next
23 question.

24 What other options did you
25 consider during your involvement with these

1 well kills?

2 A. I believe we discussed sodium
3 silicate and, you know, even gunk, you know,
4 like a gunk pill or something is the two that
5 come to mind.

6 Q. Okay. And did you view using
7 Flow Chek as risky?

8 A. I mean, if it, you know, it
9 goes back to when we discussed it with
10 everybody at SoCal, you know, that you can go
11 with more aggressive pills. But like I said,
12 if you plugged your tubing or plugged the
13 annulus or stopped a hole somewhere, it
14 possibly could have made it worse.

15 Q. Okay. Do you recall who didn't
16 buy off on this idea?

17 A. I don't know. I don't know. I
18 don't know what he's referring to in that.

19 Q. Okay. All right. Do you
20 recall bringing in some outside experts, some
21 technical advisors to assist on the well
22 kill?

23 A. Again, timelines, I have a hard
24 time. I remember them being involved, but I
25 think -- I think they came after I left.

1 Q. Okay. Let me throw some names
2 out and we'll see if it refreshes any
3 recollection.

4 Do you recall working with a
5 gentleman named Don Shackelford?

6 A. I don't recall him being there
7 when I was there.

8 Q. Okay. Do you recall working
9 with a gentleman named Jim Fox?

10 A. I don't.

11 Q. Okay. Do you recall working
12 with a gentleman named Pete Slagel?

13 A. I don't. And like I said, I
14 don't -- I don't remember seeing them out
15 there. You know, if they were in the office
16 or something, but I don't remember working
17 with them.

18 Q. I just want your best
19 recollection today.

20 Do you recall working with John
21 Wright?

22 A. No.

23 Q. Do you recall any interface or
24 interactions you had with scientists from the
25 national labs?

1 A. No.

2 Q. What was the status of the well
3 and the well kill on your final day at the
4 Aliso Canyon facility?

5 MR. KELLY: Objection.
6 Objection, vague.

7 A. Yeah, I mean I recall, you
8 know, it was getting -- as far as the
9 stability (demonstrating), you know, we had
10 to tie some guy-wires up on it, you know,
11 but -- you know, it was missing a -- you
12 know, we had to go get the pump iron and
13 stuff out of the crater.

14 The last I remember it was, you
15 know, the gas was coming out of the wellhead
16 casing valve, casing head valve, you know,
17 and it just had some, you know, movement to
18 it (demonstrating).

19 BY MR. LOTTERMAN:

20 Q. And I believe you testified
21 earlier that you had no specific involvement
22 with the well kill efforts or the relief well
23 after you left on December 13. Is that
24 accurate?

25 A. Yes.

1 Q. Okay. But I also believe you
2 said that from time to time, you read some of
3 the DORs?

4 A. Correct.

5 Q. Were you consulted at all as to
6 what program or approach to take on that last
7 well kill that occurred on December 22?

8 A. I don't recall discussing it
9 with anybody.

10 Q. Were you consulted at all with
11 the decision to stop all top kills from that
12 point forward?

13 A. No. I don't recall being in
14 that discussion.

15 Q. Were you consulted at all with
16 what sort of well kill to apply to the relief
17 well if and when it intercepted SS-25?

18 A. No.

19 Q. During your time as senior well
20 control specialist engineer at the Aliso
21 Canyon job or project, did SoCalGas have a
22 clear command structure?

23 A. Yes.

24 Q. Okay. Did they make themselves
25 accessible to you?

1 A. Yes.

2 Q. Did they solicit your views?

3 A. Yes.

4 Q. Were you candid with them?

5 A. Yes.

6 Q. Did they hold daily meetings?

7 A. Yes.

8 Q. Did they provide the
9 information you needed?

10 A. Yes.

11 Q. Did they bring in the local
12 contractors and suppliers you needed?

13 A. Yes.

14 Q. Did they observe every well
15 kill attempt?

16 A. Yes.

17 Q. Were they overall responsive to
18 your needs?

19 A. Yes.

20 Q. When I say "your," I mean
21 Boots & Coots.

22 A. Yes.

23 Q. Okay. Did SoCalGas allow
24 Boots & Coots to execute the well kill plans
25 it wanted to?

1 A. Yes. I mean, you know, every
2 job was discussed amongst SoCal and pros and
3 cons and, you know, came up with an agreed
4 plan.

5 MR. LOTTERMAN: Let me, if you
6 don't mind, consult with my colleagues
7 a minute, off the record. I think I'm
8 done.

9 THE VIDEOGRAPHER: Off the
10 record, 3:41.

11 (Recess taken, 3:41 p.m. to
12 3:50 p.m.)

13 THE VIDEOGRAPHER: The time is
14 3:50 p.m., back on the record.

15 MR. LOTTERMAN: I have no
16 further questions. Thank you,
17 Mr. Walzel.

18 FURTHER EXAMINATION

19 BY MR. KELLY:

20 Q. I have just a few follow-up
21 questions, sir. Mr. Lotterman asked you
22 whether or not you had an opportunity to
23 review the transcript of the testimony you
24 gave in front of the Public Utilities
25 Commission on August 8th, 2018.

1 Do you remember that?

2 A. Yes.

3 Q. And I didn't understand your
4 answer. I caught something about you hadn't
5 looked at it in three days or for three days
6 or -- what did you...

7 A. Yeah. So up until recently, I
8 haven't reviewed it or heard about it or...

9 Q. Okay. Did you review it
10 recently?

11 A. Yes.

12 Q. When was that?

13 A. I skimmed through it this
14 morning.

15 Q. Okay. When was -- did you see
16 it before this morning?

17 A. No.

18 Q. Okay. Did you -- when you
19 skimmed through it, did you see anything in
20 it that was inaccurate?

21 MR. LOTTERMAN: Objection,
22 vague.

23 A. I didn't read it closely, you
24 know.

25 BY MR. KELLY:

1 Q. Okay. To whatever extent you
2 did read it, did you see anything that was
3 inaccurate?

4 MR. LOTTERMAN: Same
5 objections.

6 A. At the time, nothing stood out
7 to me.

8 BY MR. KELLY:

9 Q. Okay. I asked you this morning
10 about several passages of testimony you gave.

11 A. Uh-huh.

12 Q. And I asked you if that was
13 true and correct or if you gave that
14 testimony, and you agreed with me on each
15 occasion. Were you telling the truth then?

16 A. As far as --

17 Q. That the testimony you gave was
18 accurate.

19 A. As to what?

20 Q. That it's the truth.

21 A. Oh, all of it?

22 Q. Yeah.

23 A. Oh, yes.

24 Q. What you said --

25 A. Right.

1 Q. -- was what was in the record
2 and it was truthful and honest at the time
3 you said it?

4 A. Yeah, to the best of my
5 recollection.

6 Q. Because you knew at the time
7 you gave that testimony you were under
8 penalty of perjury, right?

9 A. Correct.

10 Q. Just like you are here today.

11 A. Correct.

12 Q. And you did your best to give
13 truthful and accurate testimony, correct?

14 A. Yes.

15 Q. Okay. And you're not -- and
16 you're not now attempting to disclaim or
17 discredit any of the testimony that you gave
18 on August 8th, 2018, are you?

19 A. No.

20 Q. Okay. You -- in response to a
21 question about using water for one of the
22 well kill attempts, you told Mr. Lotterman
23 that you used water because it was less
24 abrasive and would cause less disruption or
25 damage to the well pipe? Do you recall that

1 testimony?

2 A. I believe that was referring to
3 the brine.

4 Q. Okay. Brine.

5 A. Uh-huh.

6 Q. Were you worried about
7 preserving the integrity of the well pipe
8 when you were trying to kill the well?

9 A. Well, so the step process that
10 we went through was to -- you know, we didn't
11 want to make it worse.

12 Q. Okay. But you were focused on
13 killing the well, right?

14 A. Correct.

15 Q. And at the time you were trying
16 to kill the well, you had a high degree of
17 suspicion that there was some sort of a
18 rupture in the casing, the production casing,
19 correct?

20 A. Right.

21 MR. LOTTERMAN: Objection,
22 leading.

23 BY MR. KELLY:

24 Q. Correct?

25 A. Correct.

1 Q. Okay. And so your primary
2 concern at that point was not to be nice to
3 the well pipe but to kill the well. Is that
4 correct?

5 MR. LOTTERMAN: Objection,
6 leading.

7 A. Well, yeah, the casing we
8 suspected had a hole, but that was probably
9 more reference to the wellhead and tubing,
10 you know.

11 BY MR. KELLY:

12 Q. And what was the calcium
13 chloride? What is that?

14 A. Just, you know, it's a brine.

15 Q. Brine water?

16 A. Correct, weighted up with the
17 calcium chloride.

18 Q. Did you use that in every one
19 of the well kill attempts you were on?

20 A. We did.

21 Q. You didn't?

22 A. No, we did, that I was on, yes.

23 Q. Oh, okay. And at the weight of
24 9.4?

25 A. Yes.

1 Q. Okay. And that never changed?

2 A. No. We changed -- no. We
3 changed other things.

4 Q. Okay. But that never changed?

5 A. No.

6 MR. KELLY: Okay. That's all I
7 have. Thank you very much for your
8 time.

9 MR. LOTTERMAN: You're done.

10 THE WITNESS: Okay. Thank you.

11 THE VIDEOGRAPHER: Off the
12 record, 3:55.

13 (Deposition recessed at
14 3:55 p.m.)

15 REPORTER'S NOTE: The amount of
16 examination time used in this
17 respective volume of testimony is:

18 BY MR. KELLY: 02:24:48

19 BY MR. LOTTERMAN: 01:17:33

20 BY MR. ESBENSHADE: 0:59:34

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CERTIFICATE

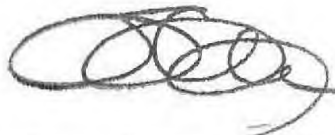
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I, SUSAN PERRY MILLER, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, DANIEL WALZEL was duly sworn by me to testify to the truth, the whole truth and nothing but the truth;

That signature of the witness was reserved by the witness or other party before the conclusion of the deposition;

That the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Susan Perry Miller
CSR-TX, CCR-LA, CSR-CA-13648
Registered Diplomate Reporter
Certified Realtime Reporter
Certified Realtime Captioner
NCRA Realtime Systems Administrator
Notary Public, State of Texas
My Commission Expires 03/30/2020

Dated: 2nd day of March, 2020

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ACKNOWLEDGMENT OF DEPONENT

I, DANIEL WALZEL, do hereby
certify that I have read the foregoing pages
and that the same is a correct transcription
of the answers given by me to the questions
therein propounded, except for the
corrections or changes in form or substance,
if any, noted in the attached
Errata Sheet.

DANIEL WALZEL

DATE

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ERRATA

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Ex. III- 5

Kill Procedure

SS-25

Nov. 12, 2015

1. Ensure a minimum of 600 bbls of 9.4 ppg CaCl₂ is available to pump before perforating the tubing.
2. Make up 2-7/8" EZSV on e-line.
3. Stab lubricator. Test to 300/4,000 psi.
4. RIH with 2-7/8" EZSV.
5. Set EZSV at \pm 8,390 ft.
6. Pull out of hole.
7. Perform positive test on EZSV to 500 psi above tubing pressure.
8. Observe 30 minutes.
9. Perform negative test on EZSV to 500 psi below tubing pressure.
10. Observe for 30 minutes.
11. RIH with tubing punch.
12. Pressure tubing to 2,000 psi.
13. Perforate tubing \pm 8,391 – 8,385 ft. (16 Shots, 0.3" x 3/8" Charge, 4 shots/foot)
14. Pull out of hole into lubricator.
15. Close swab valve and upper maseter.
16. Pump 10 bbls 9.4 ppg Polymer Plug.
17. Start pumping 9.4 ppg CaCl₂ at 4 bpm. Observe pressures
18. Increase pump rate according to pump pressure. MAX PUMP PRESSURE – 4,000 psi.
 - Observe pump pressure when KWM leaves the perforations. Attempt to maintain constant pump pressure.
 - If unable to maintain constant pump pressure a decision will be made to open choke to allow KWM to flow up the 2-7/8" x 7" annulus.
19. Pump 303 bbls. Observe well.

Barite Pill
November 14, 2015

1. Mix 22 bbls of 18.0 ppg barite pill in batch mixer.

BARITE PLUG - WATER BASED SLURRY - 1 BARREL					
Slurry wt, ppg	14.0	16.0	18.0	20.0	22.0
Fresh Water, % bbl	.788	.713	.638	.563	.489
BAROID, ppb	310	420	530	641	750
QUICK-THIN, ppb	2	2	2	2	2
Caustic Soda, ppb	.5	.5	.5	.5	.5

2. Pump 50 bbls of 9.4 ppg CaCl₂ to ensure perforations are open.
3. Continue pumping 170 bbls 9.4 ppg CaCl₂ at 8- 10 bpm.
4. Displace 22 bbls of 18.0 ppg barite pill.
5. Displace barite pill with 50 bbls of 9.4 CaCl₂ at 4 bpm
6. Shut down.
7. Wait on barite pill for 12 hours.

Barite Pill
November 15, 2015

1. Mix 22 bbls of 18.0 ppg barite pill in batch mixer.

BARITE PLUG - WATER BASED SLURRY - 1 BARREL					
Slurry wt, ppg	14.0	16.0	18.0	20.0	22.0
Fresh Water, % bbl	.788	.713	.638	.563	.489
BAROID, ppb	310	420	530	641	750
QUICK-THIN, ppb	2	2	2	2	2
Caustic Soda, ppb	.5	.5	.5	.5	.5

2. Pump 50 bbls of 9.4 ppg CaCl₂ to ensure perforations are open.
3. Continue pumping 170 bbls (220 bbls total) 9.4 ppg CaCl₂ at 8 - 10 bpm.
4. Displace 22 bbls of 18.0 ppg barite pill.
5. Displace barite pill with 50 bbls of 9.4 CaCl₂ at 4 bpm
6. Shut down.
7. Wait on barite pill for 12 hours.
8. Monitor Pressures.

Contingencies

- A. 125 bbls of 9.4 ppg CaCl₂ + 22 bbls of 18.0 ppg Barite Pill in the 7" x 2-7/8" annulus equates to 2,700 psi hydrostatic pressure.
- B. If transfer pump goes down while transferring the barite pill to the pump truck immediately displace any pill in the tubing out of the perforations with 9.4 ppg CaCl₂.
- C. The barite pill can be pumped at anytime. If surface conditions deteriorate a decision will be made to pump the barite pill even if 170 bbls of 9.4 ppg CaCl₂ has not been pumped.

WELL 25

Kill Program

11-24-15

1. Mix 50 bbl GEO Zan pill in 9.4 ppg CaCl₂
2. Mix 35 bbl 18.0 ppg Barite Pill.
3. Pump 50 bbls GEO Zan pill down tubing.
 - Prepare 50 bbls GEO Zan pill in 9.4 ppg CaCl₂.
4. Begin pumping fresh water at 12-15 bpm.
 - Monitor pump pressures. Pump at highest rate possible keeping pump pressure below 5,000 psi.
5. Pump 1,000 bbls of fresh water at 11-15 bpm.
6. Observe well.
7. If well is dead continue with **STEP 9**.
8. If well is not dead continue with **STEP 12**.
9. Pump 35 bbl 18.0 ppg Barite Pill down tubing.
10. Displace out of the perforations. (Estimated Displacement Volume – 55.5 bbls.)
11. If well is not dead begin pumping 9.4 ppg CaCl₂ at 8 – 10 BPM. Pump LCM pills as needed.
 - Monitor pump pressures. Pump at highest rate possible keeping pump pressure below 5,000 psi.
12. Pump 500 bbls CaCl₂ at 8-10 bpm.
 - Monitor pump pressures. Pump at highest rate possible keeping pump pressure below 5,000 psi.
13. Pump 35 bbls 18.0 ppg barite pill down tubing.
14. Displace with 56 bbls CaCl₂

Contingencies

- A. If while pumping unable to build pump pressure pump 15 bbl Polymer “sweeps”.
- B. Slow pump rates to try and build pump pressure.
- C. If surface conditions deteriorate the barite pill can be pumped at any time.
- D. Have transport trucks loaded with CaCl₂ to fill frac tank once pumping operations commence.
- E. Have transport truck loaded with fresh water once pumping operations commence.

WELL 25

Kill Program

11-25-15

1. Mix 100 bbl GEO Zan pill with LCM in 9.4 ppg CaCl₂
2. Pump 50 bbls GEO Zan pill down tubing.
 - Prepare 50 bbls GEO Zan pill in 9.4 ppg CaCl₂.
3. Begin pumping fresh water down tubing at 12-15 bpm.
 - Monitor pump pressures. Pump at highest rate possible keeping pump pressure below 5,000 psi.
4. Pump a minimum 1,000 bbls of fresh water at 12-15 bpm.
5. Bleed off 7" casing.
6. Once 7" casing bleeds off pump 100 bbls GEO Zan pill down tubing.
7. Displace place GEO Zan pill will 56 bbls of 9.4 CaCl₂
8. Displace out of the perforations. (Estimated Displacement Volume – 56 bbls.)
9. Line up to pump down 7" casing.
10. Pump "Junk Shot" down 7" casing.
11. Fill 7" casing with fresh water.
12. Observe well.