

**ORDER INSTITUTING INVESTIGATION ON THE COMMISSION'S OWN MOTION INTO THE OPERATIONS AND PRACTICES OF SOUTHERN CALIFORNIA GAS COMPANY WITH RESPECT TO THE ALISO CANYON STORAGE FACILITY AND THE RELEASE OF NATURAL GAS, AND ORDER TO SHOW CAUSE WHY SOUTHERN CALIFORNIA GAS COMPANY SHOULD NOT BE SANCTIONED FOR ALLOWING THE UNCONTROLLED RELEASE OF NATURAL GAS FROM ITS ALISO CANYON STORAGE FACILITY  
(I.19-06-016)**

**SOUTHERN CALIFORNIA GAS COMPANY**

**(DATA REQUEST SED-SCG-57 DATED MARCH 26, 2020)**

**SOCALGAS RESPONSE DATED MAY 7, 2020**

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated March 26, 2020 in I.19-06-016. The Responses are based upon the best available, nonprivileged information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request, and within SoCalGas' possession, custody, or control. SoCalGas' responses do not include information collected or modeled by Blade Energy Partners' during its Root Cause Analysis Investigation. SoCalGas reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

SoCalGas objects to the instructions submitted by SED and to the continuing and indefinite nature of this request on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature and continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(d) and 030.060(g), respectively. SoCalGas will provide responsive documents in existence at the time of its response. Should SED seek to update its request, SoCalGas will respond to such a request as a new data request in the future.

SoCalGas submits these Responses, while generally objecting to any Request that fails to provide a defined time period to which SoCalGas may tailor its Response, and to the extent that any Request is overly broad, vague, ambiguous, unduly burdensome, assumes facts, or otherwise fails to describe with reasonable particularity the information sought. SoCalGas further submits these Responses without conceding the relevance of the subject matter of any Request or Response. SoCalGas reserves the right to object to use of these Responses, or information contained therein, in any dispute, matter or legal proceeding. Finally, at the time of this Response, there are no pending oral data requests from SED to SoCalGas.

**QUESTION 1:**

For this data request, please refer to the SoCalGas reply testimony, Chapter IV, "Prepared Reply Testimony of Danny Walzel and Dr. Arash Haghshenas on Behalf of Southern California Gas Company".

- a. Please articulate the exact role that Danny Walzel assumed to kill well SS-25.

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- b. Please provide all invoices and other documents from Boots & Coots to SoCalGas for work done during the time of the well SS-25 leak that show the role Mr. Walzel assumed in killing well SS-25
- c. Please articulate the exact role that Dr. Hagshenas assumed to kill well SS-25.
- d. Please provide all invoices and other documents from Boots & Coots to SoCalGas for work done during the time of the well SS-25 leak that show the role Dr. Haghshenas assumed in killing well SS-25

**RESPONSE 1:**

a. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with respect to the terms "role" and "assumed," and seeks information that is already within SED's possession or equally available to SED (see transcript of SED's examination under oath of Mr. Walzel, attached to SED's Opening Testimony). Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Mr. Walzel contributed to Boots & Coots' well control efforts beginning on October 25, 2015, and until he departed from Aliso Canyon on December 14, 2015. During this period Mr. Walzel held the position of Senior Well Control Engineer. Mr. Walzel was responsible for rigging-up equipment, preparing modeling in connection with the kill attempts, and preparing and physically implementing the pumping operations during kill attempt numbers 2–6. SoCalGas notes that Mr. Walzel was made available to SED on August 8, 2018 for an Examination Under Oath (EUO) at the California Public Utilities Commission's San Francisco Office. Further information regarding Mr. Walzel's role was provided to SED's five questioners during that EUO.

b. SoCalGas objects to this request on the grounds it is vague and ambiguous and unintelligible to the extent it seeks invoices "that show the role Mr. Walzel assumed in killing well SS-25" "during the time of the well SS-25 leak." SoCalGas further objects to this request to the extent it is overly broad and unduly burdensome to the extent it seeks "all invoices and other documents." SoCalGas further objects to this request to the extent it seeks documents already in SED's possession. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas assumes

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this question seeks the Boots & Coots Daily Reports that SoCalGas previously provided to SED. Please see electronic documents previously produced to SED (AC\_CPUC\_SED\_DR\_16\_0025631 – AC\_CPUC\_SED\_DR\_16\_0025808).

c. SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with respect to the terms “role” and “assumed.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Dr. Haghshenas was involved in the SS-25 well control efforts beginning December 2, 2015<sup>1</sup> and ending February 18, 2016. During this period Dr. Haghshenas conducted transient modeling for the 7th top kill attempt. Dr. Haghshenas also prepared a model and ran simulations for the relief well used to control SS-25.

d. SoCalGas objects to this request on the grounds it is vague and ambiguous and unintelligible to the extent it seeks invoices “that show the role Dr. Haghshenas assumed in killing well SS-25” “during the time of the well SS-25 leak.” SoCalGas further objects to this request to the extent it is overly broad and unduly burdensome to the extent it seeks “all invoices and other documents.” SoCalGas further objects to this request to the extent it seeks documents already in SED’s possession. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas understands this question to seek the Boots & Coots Daily Reports. Please see documents previously produced to SED (AC\_CPUC\_SED\_DR\_16\_0025631 – AC\_CPUC\_SED\_DR\_16\_0025808).

**QUESTION 2:**

Please refer to the following passages in the Chapter IV reply testimony, page 3 to answer rest of the questions in this data request, except for questions 32 and 33.

**Q: DID BOOTS & COOTS PERFORM TRANSIENT KILL MODELING PRIOR TO KILL ATTEMPT #7?**

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<sup>1</sup> SoCalGas notes that a typographical error appears in SoCalGas’ Reply, Chapter IV (Walzel/Haghshenas) at page 2, line 3. The date “December 7” should be replaced with “December 2,” as stated in this response.

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

Q: DOES BOOTS & COOTS HAVE THE TRANSIENT MODELING RECORDS RELATED TO ITS SS-25 KILL ATTEMPTS?

A: Only for the December 22, 2015, well kill. Danny Walzel had conducted the transient modeling for well kill prior to December 22, 2015. However, the transient modeling was done on his laptop. This laptop was stolen from him, along with other personal items, in late December 2015. Mr. Walzel reported the theft to the police. Mr. Walzel's transient modeling was not saved anywhere else, nor was it sent to anyone else.

With these passages in mind, please answer the following questions.

**RESPONSE 2:**

SoCalGas objects to this request to the extent it asks no question to which SoCalGas can respond.

**QUESTION 3:**

Provide the police report of the theft that Mr. Walzel reported to the police.

**RESPONSE 3:**

SoCalGas objects to this request on the grounds it is vague and ambiguous, particularly with respect to the term "police report." SoCalGas further objects to this request it seeks documents not in SoCalGas' possession. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. The Houston Police Department provided Mr. Walzel with a document regarding the reported theft of Mr. Walzel's laptop and other belongings, provided here bearing the following bates number: AC\_CPUC\_SED\_DR\_57\_0000001.

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**QUESTION 4:**

Did SoCalGas disclose the information in these passages to Blade Energy Partners (Blade) during Blade's Root Cause Analysis?

**RESPONSE 4:**

SoCalGas objects to this request to the extent it is vague and ambiguous regarding the terms "the information in these passages." SoCalGas further objects to this request to the extent it assumes Blade specifically asked SoCalGas to produce "transient modeling" in connection with the SS-25 well control efforts. SoCalGas further objects to this request to the extent it seeks information that is equally available to SED, as SED was copied on all data request responses provided to Blade Energy Partners in the course of Blade's investigation prior to issuing its Root Cause Analysis report. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Regarding the details described in the testimony excerpted by SED in the passage above, SoCalGas first became aware of this information cited in the excerpted passage on February 21, 2020, after Blade Energy Partners had issued its Root Cause Analysis Report.

**QUESTION 5:**

If the answer to question 4 is yes, provide documentation showing this, including the dates and the Blade data requests to which this information responded.

**RESPONSE 5:**

N/A. See response to Question 4.

**QUESTION 6:**

If the answer to question 4 is no, please explain why not.

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**RESPONSE 6:**

See response to Question 4.

**QUESTION 7:**

When did SoCalGas first learn of the information provided in these passages?

**RESPONSE 7:**

SoCalGas objects to this request to the extent it is vague and ambiguous due to the compound nature of the question. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See response to Question 4.

**QUESTION 8:**

Provide documentation showing the answer to question 7.

**RESPONSE 8:**

SoCalGas objects to this question to the extent it is vague and ambiguous and unintelligible to the extent it seeks documentation that SoCalGas was not aware of a fact. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

Please see SoCalGas Reply Testimony, Ex. III-4 (Danny Walzel Depo. (Feb. 21, 2020).)

**QUESTION 9:**

Beginning October 23, 2015 and continuing until well SS-25 was successfully killed, did SoCalGas have any procedures, plans, protocols, or other requirements in place that it be provided with records related to a well kill such as the well kills for SS-25, including transient modeling records?

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**RESPONSE 9:**

SoCalGas objects to this question to the extent it is vague and ambiguous with respect to the phrases "such as the well kills for SS-25," and "transient modeling records." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. No.

**QUESTION 10:**

If the answer to question 9 is yes, please provide all such requirements, and identify the page number and quoted excerpt or excerpts that support the answer.

**RESPONSE 10:**

N/A. Please see response to Question 9.

**QUESTION 11:**

Given that SoCalGas must comply with the safety requirements of California Public Utilities Code Section 451, please answer the following:

- a. Does SoCalGas find it acceptable the assertion in Mr. Walzel's testimony that "Mr. Walzel's transient modeling was not saved anywhere else, nor was it sent to anyone else"?
- b. Does SoCalGas take the position that it was appropriate for transient modeling of the SS-25 well kill attempts to not have been saved anywhere else than Mr. Walzel's laptop, and not to have been sent to anyone else?

**RESPONSE 11:**

- a. SoCalGas objects to this question on the grounds it is vague, ambiguous and unintelligible with respect to the phrase "find it acceptable the assertion" and relation to Section 451 of the California Public Utilities Code. SoCalGas further objects to this request to the extent it calls for a legal conclusion. SoCalGas additionally objects to this request to the extent it constitutes an incomplete hypothetical.

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- b. SoCalGas objects to this question on the grounds it is vague and ambiguous with respect to the term “appropriate” and relation to Section 451 of the California Public Utilities Code. SoCalGas further objects to this request to the extent it calls for a legal conclusion. SoCalGas further objects to this request to the extent that it assumes that regulations and/or industry standards require that well control efforts necessarily require transient modeling.

**QUESTION 12:**

How many transient models were created for the kill attempts of SS-25?

**RESPONSE 12:**

SoCalGas objects to this question on the grounds it is vague, ambiguous and unintelligible with respect to the phrase “[h]ow many transient models.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas understands this question to ask for the number of discrete models that were created in connection with the seven top kills attempted on SS-25. SoCalGas understands from Boots & Coots that Boots & Coots used software to prepare one discrete transient model in connection with top kill attempts 3-6, and a second discrete model for top kill attempt 7.

**QUESTION 13:**

Please list the number of transient models that were created for each well kill attempt of SS-25. Please be sure to include the date each model was completed, and the kill attempt for which each model was used.

**RESPONSE 13:**

SoCalGas objects to this question to the extent it is vague and ambiguous with respect to the phrase “number of transient models.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

As described in SoCalGas’ Reply Testimony, Boots & Coots performed transient kill modeling before its November 18, 2015 kill attempt and for each kill attempt thereafter.



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However, the laptop containing the modeling for kill attempts 3-6 was stolen from Mr. Walzel's vehicle after he returned to Houston, and the laptop was never recovered. (See, SoCalGas' Reply Testimony Chapter IV (Walzel/Haghshenas) at 3.) Therefore, SoCalGas cannot provide the detail sought for the modeling that was conducted in support of top kill attempts 3-6. Transient modeling prepared in connection with the 7th kill attempt was prepared on or around December 16, 2015 and completed prior to the 7th kill attempt on December 22, 2015.

**QUESTION 14:**

Other than Mr. Walzel, did any other Boots & Coots employee, SoCalGas personnel member, or any other individual develop or produce, or help develop or help produce a transient model that was used to kill SS-25?

**RESPONSE 14:**

SoCalGas objects to this question to the extent it is vague and ambiguous with respect to the phrases "develop or produce" and "help develop and produce." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas understands this request to seek information regarding the transient modeling prepared in connection with top kill attempts 3-7. Yes, another Boots & Coots employee prepared modeling in connection with the 7th top kill attempted on SS-25.

**QUESTION 15:**

If so, please identify each individual, the model they developed or produced, or helped develop or produce, the date the model was produced, and the kill for which the model was produced.

**RESPONSE 15**

SoCalGas objects to this question to the extent it is vague and ambiguous with respect to the phrases "develop or produce" and "help develop and produce." Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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SoCalGas understands this request to seek information regarding the transient modeling prepared in connection with top kill attempts 3-7. In December 2015, Dr. Haghshenas of Boots & Coots helped develop a transient model in connection with the 7th top kill attempted on SS-25.

**QUESTION 16:**

Please provide each model identified in response to the prior question.

**RESPONSE 16:**

SoCalGas objects to this request to the extent it seeks information that is not in the custody or control of SoCalGas or Boots & Coots. SoCalGas further objects to this request as vague and ambiguous regarding the term "model." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. As noted in SoCalGas' Reply Testimony Chapter IV (Walzel / Haghshenas), and acknowledged by SED in Question 2 of this data request, only the transient kill modeling prepared in connection with the December 22, 2015 top kill attempt is within the possession, custody, or control of Boots & Coots. Therefore, SoCalGas interprets this request as seeking the transient model prepared in connection with Boots & Coots' seventh well kill attempt. However, the "model" itself cannot be reviewed without access to licensed modeling software. To the extent that SED seeks transient modeling data related to the seventh kill attempt, please see documents previously provided to SED:

AC\_CPUC\_0173909 – AC\_CPUC\_0173913; AC\_CPUC\_0173168 – AC\_CPUC\_0173172.

**QUESTION 17:**

Did Mr. Walzel participate in all of the Boots & Coots well kill attempts?

**RESPONSE 17:**

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "participate." Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

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No. As described in SoCalGas' Reply Testimony, Mr. Walzel contributed to Boots & Coots' well control efforts beginning on October 25, 2015 and until he departed from Aliso Canyon on December 14, 2015.

**QUESTION 18:**

Did Mr. Walzel take any notes related to the transient models that were not on his stolen laptop?

**RESPONSE 18:**

SoCalGas objects to this request as vague and ambiguous regarding the term "notes related to the transient models." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas interprets "notes" as notes taken by Mr. Walzel and not correspondence. No. SoCalGas understands from Boots & Coots that all notes, if any, taken by Mr. Walzel would have been transcribed on his laptop that was later stolen from Mr. Walzel's vehicle.

**QUESTION 19:**

If so, please provide all such notes.

**RESPONSE 19:**

N/A. See response to Question 18.

**QUESTION 20:**

Please confirm that all transient models were actually SAVED on Mr. Walzel's stolen laptop.

**RESPONSE 20:**

SoCalGas objects to this question on the basis that it is vague and ambiguous and unintelligible with respect to the capitalization of the word SAVED. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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SoCalGas understands from Boots & Coots that transient modeling prepared in support of well kill attempts 3-6 were saved on the laptop that was stolen from Mr. Walzel's vehicle.

**QUESTION 21:**

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

**RESPONSE 21:**

SoCalGas objects to this question on the basis that it is vague and ambiguous and unintelligible with respect to the phrase "authorize the use of." Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The transient modeling helped inform the kill plans prepared by Boots & Coots. SoCalGas approved the kill plans that were prepared by Boots & Coots and ultimately used to implement each top kill attempt.

**QUESTION 22:**

Was a different transient model created for each well kill attempt?

**RESPONSE 22:**

SoCalGas objects to this request to the extent it is duplicative of Questions 12 and 13. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See response to Questions 12 and 13.

**QUESTION 23:**

If so, please identify each well kill attempt for which a transient model was used.

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**RESPONSE 23:**

SoCalGas objects to this question to the extent it seeks information that is already in the possession of SED. SoCalGas further objects to this request to the extent it is duplicative of Questions 12 and 13. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See responses to Questions 12 and 13 herein. As stated in SoCalGas' Reply Testimony Chapter IV (Walzel / Haghshenas), transient modeling was performed for each well kill performed by Boots & Coots after Boots & Coots' second attempt.

**QUESTION 24:**

If not, why not?

**RESPONSE 24:**

SoCalGas objects to this question to the extent it is vague, ambiguous, and unintelligible to the extent it purports to ask a question without a premise. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See responses to Questions 22 and 23.

**QUESTION 25:**

Did SoCalGas review Mr. Walzel's transient models?

**RESPONSE 25:**

SoCalGas reviewed and approved the kill plans that were prepared by Boots & Coots and ultimately used to implement each top kill attempt. The transient modeling helped inform the kill plans prepared by Boots & Coots.

**QUESTION 26:**

Did SoCalGas approve each of Mr. Walzel's transient models before the well kill attempt for which they were used?

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**RESPONSE 26:**

SoCalGas objects to this question to the extent it is vague and ambiguous, particularly in reference to Question 21 of this data request, which asks whether SoCalGas “authorize[d]” the use of Mr. Walzel’s transient models. SoCalGas further objects to this request to the extent it is duplicative of Question 21 herein. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this question to ask the same question posed in Question 21 herein. Accordingly, see SoCalGas’ response to Question 21.

**QUESTION 27:**

If not, why not?

**RESPONSE 27:**

SoCalGas objects to this question to the extent it is vague, ambiguous, and unintelligible to the extent it purports to ask a question without a premise. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See responses to Questions 21, 25 and 26.

**QUESTION 28:**

If SoCalGas approved of each of Mr. Walzel’s transient models before the well kill attempt for which they were used, describe SoCalGas’s review process of Mr. Walzel’s transient models?

**RESPONSE 28:**

SoCalGas objects to this request to the extent it is vague and ambiguous, particularly with respect to the term “review process.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See responses to Questions 21, 25, and 26.

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**QUESTION 29:**

If SoCalGas approved of each of Mr. Walzel's transient models before the well kill attempt for which they were used, please identify the individual from SoCalGas who approved of Mr. Walzel's transient models?

**RESPONSE 29:**

SoCalGas objects to this request to the extent it is vague and ambiguous with respect to the use of the term "approved of." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. N/A. See responses to Questions 21, 25 and 26.

**QUESTIONS 30:**

Please define in detail the process behind creating a transient well model.

- a. For example, what are the inputs?
- b. What are the outputs?
- c. Etc.

**RESPONSE 30:**

SoCalGas objects to this question on the grounds it is vague and ambiguous with respect to the request to "define" a "process," and unintelligible at subpart (c) of the question. SoCalGas further objects to this request to the extent that it seeks information that is equally available to SED and does not require discovery from SoCalGas nor its testifying witnesses.

**QUESTION 31:**

Consistent with industry practice, please state all steps and calculations necessary to produce a transient well model.

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**RESPONSE 31:**

SoCalGas objects to this question to the extent it is vague and ambiguous with respect to the phrase, "Consistent with industry practice" – this phrase renders the question posed unintelligible. SoCalGas further objects to this request to the extent that it seeks information that is equally available to SED and does not require discovery from SoCalGas nor its testifying witnesses.

**QUESTION 32:**

Please state all steps and calculations that were taken to produce the transient well models that Mr. Walzel's testimony asserts that were done for the well SS-25 kill attempts.

**RESPONSE 32:**

SoCalGas objects to this question on the grounds it is vague and ambiguous and unintelligible with respect to the phrase "the transient well models that Mr. Walzel's testimony asserts that were done for the well SS-25 kill." Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Based on conversations with Boots & Coots, SoCalGas understands that Mr. Walzel prepared modeling for kill attempts 3-6 using Drillbench. The preparation of the model included the following general steps: (1) define the wellbore parameters, including the trajectory, casing, drill pipe and tubing; (2) define the kill fluid properties; (3) define reservoir properties, such as the reservoir fluid, and the reservoir capabilities for the blowout condition; (4) define the flow path, and surface condition; and (5) define the temperature profile in the wellbore.

**QUESTION 33:**

Did SoCalGas or any entity that it hired conduct transient modeling related to its SS-25 kill attempts after December 22, 2015?



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**RESPONSE 33:**

SoCalGas objects to this question on the basis that it is vague and ambiguous with respect to the phrase "transient modeling related to its SS-25 kill attempts." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas interprets this request as seeking whether SoCalGas or any entity that it hired conducted transient modeling to assist with SS-25 top kill attempts after December 22, 2015. No, the final top kill attempt was executed on December 22, 2015.

**QUESTION 34:**

If the answer to question 33 is yes, please provide the transient modeling records showing the answer.

**RESPONSE 34:**

N/A. See response to Question 33.

**QUESTION 35:**

If the answer to question 33 is yes, please explain why such models were conducted.

**RESPONSE 35:**

N/A. See response to Question 33.

**QUESTION 36:**

If the answer to question 33 is no, why not?

**RESPONSE 36:**

N/A. See response to Question 33.

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**QUESTION 37:**

Were any other records related to SoCalGas's SS-25 kill attempts on Mr. Walzel's stolen laptop?

**RESPONSE 37:**

SoCalGas objects to the question to the extent it is vague and ambiguous with respect to the phrase "any other records" – the predicate has not been established. SoCalGas further objects to this request to the extent that it seeks information that is not in the possession, custody or control of Boots & Coots, or SoCalGas. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

SoCalGas interprets this question to ask whether Mr. Walzel retained information other than the transient kill models referenced in SoCalGas' Reply Testimony, Chapter IV (Walzel / Haghshenas) on page 3, on his laptop. Mr. Walzel's laptop was stolen over four years ago, and has not since been recovered. SoCalGas has inquired with Boots & Coots, and without having access to Mr. Walzel's stolen laptop, neither Boots & Coots nor SoCalGas is able to respond to this request.

**QUESTION 38:**

If the answer to question 37 is yes, please list them.

**RESPONSE 38:**

SoCalGas objects to this request on the ground it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Mr. Walzel's laptop was stolen over four years ago, and has not since been recovered. SoCalGas has inquired with Boots & Coots, and without having access to Mr. Walzel's stolen laptop, neither Boots & Coots nor SoCalGas is able to respond to this request.

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**QUESTION 39:**

For each of the records listed in response to question 37, please state whether the record was saved elsewhere (e.g, a main server, on portable drive, etc.), or sent to another person. For each record that was saved elsewhere or sent to another person, please identify where the record was saved and to whom the record was sent.

**RESPONSE 39:**

SoCalGas objects to this request on the grounds the question is overly broad and unduly burdensome. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

N/A. See response to Question 38.

**QUESTION 40:**

Please describe the purpose of each record listed in response to question 37.

**RESPONSE 40:**

N/A. See response to Question 38.

**QUESTION 41:**

Was Mr. Walzel's stolen laptop recovered?

**RESPONSE 41:**

No. See responses to Questions 13 and 37.

**QUESTION 42:**

If the answer to question 41 is yes, were any of the transient models on it?

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**RESPONSE 42:**

N/A. See response to Question 41.

**QUESTION 43:**

If the answer to question 41 is yes, were any other records related to SoCalGas's SS-25 kill attempts on it?

**RESPONSE 43:**

N/A. See response to Question 41.

**QUESTION 44:**

From what exact location was Mr. Walzel's laptop stolen?

**RESPONSE 44:**

7138 Farm to Market 1960 Rd. W, Houston Texas, 77070.

**QUESTION 45:**

When it was stolen, was Mr. Walzel's laptop inside a secure space that was somehow protected against property inside of it being stolen?

**RESPONSE 45:**

SoCalGas objects to this request on the ground it is vague and ambiguous with respect to the phrases "secure space" and "somehow protected against property inside of it being stolen." Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

Mr. Walzel's laptop was locked inside of his truck.

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**QUESTION 46:**

If the answer to question 45 is yes, please describe the secure space, and all protections that the space had in place to protect against stolen property.

**RESPONSE 46:**

SoCalGas objects to this request to the extent it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, and the "burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. Please see Response to Question 45.

**QUESTION 47:**

If Mr. Walzel's laptop was not inside a secure space when stolen, why not?

**RESPONSE 47:**

N/A. See responses to Questions 45 and 46.

**QUESTION 48:**

For prior SoCalGas well kill attempts (both for SS-25 and others), have any transient modeling records been stolen from SoCalGas or its employees or contractors?

**RESPONSE 48:**

SoCalGas objects to the question to the extent it is vague and ambiguous with respect to the phrase "transient modeling records." SoCalGas objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

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Aside from the transient modeling that was contained on Mr. Walzel's stolen laptop, SoCalGas is not aware of any other property theft in connection with the SS-25 incident.

**QUESTION 49:**

If so, please list them.

**RESPONSE 49:**

SoCalGas objects to this question on the grounds it is vague and ambiguous to the extent it poses a request without any reference. Subject to and without waiving the foregoing objection, SoCalGas responds as follows: N/A. Please see response to Question 48.

**QUESTION 50:**

For prior well kill attempts, has SoCalGas ever allowed its contractor to keep transient modeling records, but not save the records anywhere other than their laptop, and not send the records to anyone else?

**RESPONSE 50:**

SoCalGas objects to this request on the grounds it is vague and ambiguous with respect to the phrase "transient modeling records," and compound, argumentative, and overly broad and unduly burdensome to the extent it is not limited to any time frame to which SoCalGas may tailor its response. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

The use of transient modeling is not a widely utilized practice in the industry for controlling well failures by top kill. Aside from the SS-25 incident, SoCalGas has never worked with a contractor that prepared transient kill modeling for a well control operation at Aliso Canyon.

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**QUESTION 51:**

If so, please list all such instances.

**RESPONSE 51:**

SoCalGas objects to this question to the extent it makes a request without any reference. Subject to and without waiving the foregoing objection, SoCalGas responds as follows: N/A. Please see response to Question 50.

**QUESTION 52:**

With regards to the well kill attempts of SS-25, did Boot & Coots use transient modeling for any earlier attempt to inform the decision making related to any later attempt?

**RESPONSE 52:**

SoCalGas objects to this request to the extent it is vague and ambiguous with respect to the terms "earlier attempt" and "later attempt" and the phrase "inform the decision making related to." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Yes.

**QUESTION 53:**

What else was with Mr. Walzel's laptop at the time it was stolen? Please be specific in answering this question. For example, if other equipment, notes, or other things were stolen, please describe them in detail.

**RESPONSE 53:**

SoCalGas objects to this request to the extent it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, and the "burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request to the extent it seeks information that is beyond the scope of this

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proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas additionally objects to this question to the extent it is compound, unintelligible, and internally inconsistent to the extent it asks SoCalGas to identify what items were "with Mr. Walzel's laptop at the time it was stolen," but later asks SoCalGas to identify items that "were stolen."

**QUESTION 54:**

Were any of the other things that were with Mr. Walzel's laptop at the time it was stolen also stolen along with the laptop?

**RESPONSE 54:**

SoCalGas objects to this request to the extent it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, and the "burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas additionally objects to this question to the extent it is duplicative of Question 53 hereinabove.

**QUESTION 55:**

If the answer to question 54 is yes, which things were stolen, and which were not?

**RESPONSE 55:**

SoCalGas objects to this request to the extent it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, and the "burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request to the extent it seeks information that is beyond the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas also objects to this request to the extent it is duplicative of Questions 53 and 54. SoCalGas additionally objects to this question to



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the extent it is unintelligible in its reference to Question 54, which does not seek a response that can be further parsed as requested in this question.

**QUESTION 56:**

Please identify the words in the requested police report that support the answers provided in response to questions 54 and 55.

**RESPONSE 56:**

SoCalGas objects to this request as vague and ambiguous, particularly with reference to the term "police report." SoCalGas objects to this request to the extent it assumes SoCalGas has possession, custody, or control over a police report. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

See response to Question 3.

**QUESTION 57:**

What else relating to SS-25 was stolen when Mr. Walzel's laptop was stolen?

**RESPONSE 57:**

SoCalGas objects to this request on the grounds it is vague and ambiguous as the phrase "relating to." SoCalGas further objects to this question to the extent this question is duplicative of Questions 37 and 43. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this request as asking whether any items related to Boots & Coots' well control efforts on SS-25, aside from any materials on Mr. Walzel's stolen laptop, were also stolen. No.

**QUESTION 58:**

Did Mr. Wenzel [*sic*] use an internet model to do his transient model calculations?

- a. If yes, what internet service provided the model? Please provide the website address.

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- b. If yes, did Mr Wenzel [*sic*] enter data, run the model and download results and/or a report to his laptop?
- c. If yes, does Mr. Wenzel [*sic*] have an online account with the service identified in response to a. above?
  - 1. If yes, are the results and/or reports that were generated stored in his online account?
    - a. If yes, please provide the results/reports.

**RESPONSE 58:**

SoCalGas objects to this request to the extent it is vague and ambiguous with respect to the terms "internet model." Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

a-c. Mr. Walzel performed transient kill modeling using a licensed software called Drillbench. The transient kill modeling performed by Mr. Walzel is not available on an online platform.

**QUESTION 59:**

Was the transient model that Mr. Wenzel [*sic*] used a commercial product or something created by him, Boots & Coots or someone else?

- a. If it was a commercial product, what is the name of the product and where can it be purchased or downloaded?
- b. If it was created, please identify the person or company who created the model.

**RESPONSE 59:**

a-b. SoCalGas objects to this request to the extent it is vague and ambiguous with respect to the phrase "transient model that Mr. Wenzel [*sic*] used." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Mr. Walzel performed transient kill modeling using a licensed software called Drillbench. Drillbench is available for purchase from the company Schlumberger.

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**QUESTION 60:**

Is the transient model a spreadsheet model? If yes, provide a copy in native format with any instructions that are available.

**RESPONSE 60:**

SoCalGas objects to this request to the extent it is vague and ambiguous with respect to the demand to "provide a copy in native format." Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

See responses to Questions 58 and 59.



Auto Theft Division  
(713) 308-3520  
Houston Police Department

Incident No.: 165341515 - M

Title: BARCLAY MOTOR VEHICLE

Address: 7318 W. FM 1960

Date: 12/26/15

Officer's Name: HC-TRAN

Unit No.: 5F43D

Crime Prevention: [www.houstonpolice.org](http://www.houstonpolice.org)

Report Gang Tips: [www.stophoustongangs.org](http://www.stophoustongangs.org)