UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 18 2015

Via email (DArriola@semprautilities.com) and Certified Mail

CERTIFIED MAIL NO. 7015 0640 0007 0638 0669
RETURN RECEIPT REQUESTED

In Reply Refer to:
Southern California Gas Company Aliso Canyon Natural Gas Release

Dennis Arriola
President and CEO
Southern California Gas Company
555 W 5th St
Los Angeles, CA 90013-1010

RE: Request for Information, Southern California Gas Company Aliso Canyon Natural Gas Release

Dear Mr. Arriola:

The United States Environmental Protection Agency ("EPA") is conducting an investigation of the natural gas release (the "Release") at the Southern California Gas Company (the "Company's") Aliso Canyon Natural Gas Storage Facility located at 12801 Tampa Ave. in Northridge, CA, (the "Facility") that was discovered on or about October 23, 2015.

With this letter and its enclosure ("Information Request"), EPA seeks additional information and documents concerning the Company's compliance with the Clean Air Act, 42 U.S.C. §§ 7401 *et seq* ("CAA"). This Information Request is authorized pursuant to Section 114 of the CAA, 42 U.S.C. § 9614. Your responses to this letter must be made by a letter, signed by a person or persons duly authorized to represent the Company. Electronic copies of submittals are preferred. EPA believes that much of the requested information is, or should be, readily available at the Facility. If there are any responsive documents or information which you are unable to provide, please provide an explanation for, and documentation of reasons for, the Company's inability to provide that information. Please send your submittals so that they are *received by no later than* **December 31, 2015.** Address your response to:

Kathryn Lawrence (SFD-9-3)
Section Chief
Emergency Prevention and Preparedness Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105
lawrence.kathryn@epa.gov

Please note that, pursuant to regulations located at 40 CFR Part 2, Subpart B, you are entitled to assert a business confidentiality claim covering any part of the submitted information as defined in 40 CFR § 2.201(c). Asserting a business confidentiality claim does not relieve you from the obligation to fully respond to this letter. Failure to assert such a claim makes the submitted information subject to public disclosure upon request and without further notice to you, pursuant to the Freedom of Information Act, 5 U.S.C. § 552. Information subject to a business confidentiality claim may be available to the public only to the extent set forth in the above-cited regulation. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. In addition, EPA has not waived any rights to take enforcement action for past or future violations.

The Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action being taken in accordance with Section 113 of the CAA, 42 U.S.C. § 7413. This may include civil and administrative penalties of up to $37,500 per day of noncompliance. In addition, the submission of knowingly false or misleading statements may be punished by a fine pursuant to Title 18 of the U.S. Code, or by imprisonment for not more than two years, or both.

This request for information is not subject to review by the Office of Management and Budget ("OMB" under the Paperwork Reduction Act because it is not a "collection of information" within the meaning of 44 U.S.C. §§ 3502(3), 3507, and 3512. *See*, *also*, 4 CFR §§ 1320.3(c), 1320.5, and 1320.6(a). Furthermore, this request is exempt from OMB review under the Paperwork Reduction Act because it is part of an investigation of a specific individual or entity. 44 U.S.C. § 3518(c)(1); 5 CFR § 1320.4.

If you have questions about the legal aspects of this Information Request, please contact Ms. Letitia Moore, U.S. EPA Assistant Regional Counsel, at (415) 972-3928 or moore.letitia@epa.gov. The Region IX technical contact for this information request is Kathryn Lawrence, who may be reached at (415) 972-3039 or johnstone.jeremy@epa.gov . We thank you in advance for your cooperation.

Sincerely,

Enrique Manzanilla, Director
Superfund Division

Enclosures (2)
1 - Information Request
2 - Confidential Business Information

cc (via email w/enclosures):
Jimmie Cho, SoCalGas
John Geroch, DOGGR
Mohsen Nazemi, SCAQMD
Alice Reynolds, CalEPA
Bill Jones, LACFD
Gregory Reynar, LAFD

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Enclosure 1

Information Request
Southern California Gas Co.

Please provide the information requested in the Information Request section of this Enclosure such that it is received by no later than **December 31, 2015**.

INSTRUCTIONS

1. Please provide a separate response to each request, and identify each response by the number of the request to which it corresponds. For each document produced, identify the request to which it is responsive.

2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form

3. All responsive documents must be: a) provided as an accurate and legible copy in a searchable PDF file format; b) submitted on via electronic media (thumb drive, CD, or DVD); and c) number stamped in sequential order (e.g. BATES stamped). Furthermore, data should be provided in spreadsheet format (e.g., Excel format), when available, rather than as image or PDF formats.

4. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.

5. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice. [Some EPA Regions refer to an enclosure such as the one I've included as "Enclosure 4" here for further discussion of the CBI issue and process].

6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.

7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.

8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding the information.

DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean the Southern California Gas Co., or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by the Company at the Aliso Canyon Natural Gas Storage Facility property or properties located at 12801 Tampa Ave. in Northridge, CA, or contiguous or adjacent to that address.

3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.

5. "Release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances, extremely hazardous substances, regulated substances, air pollutant, pollutants or contaminants. "Release" shall include "accidental release" as that term is defined by 40 C.F.R. § 68.3.

7. "Standard Operating Procedure" or "SOP" means any express method or series of protocols to be followed routinely for the performance of designated operations or in designated situations by you or your subcontractors.

8. "Well SS 25 Release" shall mean the Release of odorized natural gas from Facility Standard Sesnon Well SS 25 that commenced on or about October 23, 2015.

9. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, 40 CFR Part 302, 40 CFR Part 355 or 40 CFR Part 372, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUEST

1. Provide the following general information:

    a. A Facility map and plot plan, to include the well pad for Standard Sesnon Well 25 ("Well SS 25");

    b. A description of the Facility and operations;

    c. A management organizational chart for the Facility (include identification of personnel with environmental responsibilities); and

    d. Descriptive information about any/all other natural gas storage fields owned or operated by the Company and/or its parent corporation.

2. With respect to the Well SS 25 Release provide copies of all submittals made to any local, state or federal agencies relating to the Release as of the date of the response to this Information Request.

3. Unless otherwise provided in response to Item 2 above, provide the following regarding the Well SS 25 Release. If provided in in response to Item 2 above, identify the corresponding document and page numbers.

    a. A map or other depiction showing, as well as a description of, the point(s) of the Release;

    b. A description of the cause of the Release, including all known and/or suspected root causes and contributory factors;

    c. Design specifications for Well SS 25;

    d. A detailed history of physical changes or modifications made to Well SS 25, including the dates such modifications were implemented and the purpose for which the modifications were made;

    e. A description of the Company's mechanical integrity program for the inspection, testing and preventive maintenance for Well SS 25, including leak detection;

    f. All documents that describe Standard Operating Procedures used in the inspection, testing and preventive maintenance of Well SS 25, including leak detection;

    g. A listing of recognized and generally accepted good engineering practices, used in the development and implementation of the Company's inspection, testing and preventive maintenance of Well SS 25;

    h. Inspection, maintenance, and leak detection records for Well SS 25 from January 1, 2012 to the present;

i. All documents that describe Standard Operating Procedures used for accident mitigation or emergency response regarding any risks associated with the maintenance and operation of Well SS 25 or other similarly-situated wells;

j. A description of current fire safety/prevention measures being implemented both at the Release point(s) and at the Well SS 25 wellhead;

k. A description of current Incident Command Structure (ICS) organizational structure (ICS 207 or equivalent);

l. Identification of any/all incident-specific website(s) that any safety and/or regulatory agencies have current access to. Provide access to EPA;

m. Identify and provide copies of any notifications of the Release made to public agencies, including agency name; date, time and method of notification; whom contacted; and notification/report number (as applicable);

n. Copies of the Company's policies and procedures with respect to public agency notifications of natural gas leaks at the Facility;

o. Company-prepared estimates of release rates to the atmosphere (daily, weekly, monthly, and/or yearly) for natural gas, total volatile organic compounds (VOCs) (as defined under 40 CFR § 51.100) and total reduced sulfur (TRS) from Well SS 25 during the Well SS 25 Release, with supporting documentation of methodology/methodologies employed in arriving at estimate(s); and

p. A description of all activities undertaken, as of the date of your response to this Information Request, to mitigate the rate and quantity of natural gas released during the Well SS 25 Release.

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Enclosure 2

Confidential Business Information (CBI)
Assertion and Substantiation Requirements

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this information request, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business's competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this request for information, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph and sentence when identifying the information subject to your claim.

2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.

3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Letitia Moore
Assistant Regional Counsel
U.S. EPA Region 9
75 Hawthorne St.
San Francisco, CA 94105
Moore.letitia@epa.gov

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your answers or comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). As required by 40 C.F.R. § 2.204(e)(6), you may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the Act and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.