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February 18, 2016

**VIA COURIER**

Los Angeles Regional Water Quality Control Board  
320 W. Fourth Street  
Suite 200  
Los Angeles, CA 90013  
Attn: Joshua Cwikla

**Subject:** Investigative Order No R4-2015-0300

Mr. Cwikla:

This letter and attached "Technical Report" comprises Southern California Gas Company's ("SoCalGas") response to the Los Angeles Regional Water Quality Control Board's ("Regional Board") December 18, 2015 order (the "13267 Letter") to submit information related to the disposal of well drilling fluids, well completion fluids and well production fluids from SoCalGas' oil and gas operations in Los Angeles and Ventura County, California. In a January 19, 2016 letter, the Regional Board extended SoCalGas's deadline for responding to the 13267 Letter, to February 18, 2016.

Please note that SoCalGas's investigation efforts are ongoing. The response set forth herein and the attached documents provided are based upon the information available to SoCalGas at the time of this submittal. SoCalGas will be supplementing this response with additional information regarding historical sumps at the Aliso Canyon Storage Facility and a number of remedial closure reports in the near term. SoCalGas is also continuing to investigate whether or not there are other historical sumps at all of its storage facilities, and will provide additional responsive information if uncovered.

Furthermore, continued investigation may cause this response to be incomplete or subject to amendment or modification. SoCalGas, therefore, reserves its right to amend or further supplement this response and submit additional documents in the event of new or additional information and/or changed circumstances.

### **Regional Board 13267 Letter and Response**

In the 13267 Letter, the Regional Board notes that "[a] common oil and gas industry practice is to discharge well drilling fluids, well completion fluids, and oil production fluids to land, typically into sumps or ponds." The 13267 Letter goes on to require SoCalGas to provide a technical report requiring significant information related to

SoCalGas' "sumps"<sup>1</sup> at its "oil and gas operations" in Los Angeles and Ventura counties.

SoCalGas operates the following four natural gas storage facilities (the "Facilities") in Los Angeles County:

- Aliso Canyon Storage Facility  
12801 Tampa Avenue  
Northridge, CA 91326-1045
- Honor Rancho Storage Facility  
28300 Brady Parkway  
Valencia, CA 91355-1203
- Montebello Storage Facility  
831 Howard Avenue  
Montebello, CA 90640-2598
- Playa Del Rey Storage Facility  
8142 Gulana Avenue  
Playa Del Rey, CA 90293-7930

SoCalGas operates an unmanned gas compressor station in Ventura County, located at 1555 N. Olive Street, Ventura, California. No oil or gas production activity occurs at this site, nor does it have any oil or gas wells, sumps, or produced water ponds.

SoCalGas does not operate any "sumps" as defined by the Regional Board at the Facilities. Instead, our current practice at the Facilities is to collect and temporarily store well drilling fluids, well completion fluids, and well production fluids onsite in tanks and then transport them offsite for appropriate disposal. Specifically, SoCalGas contracts with Waste Management Inc. and Anterra, an oilfield waste management company, to transport and dispose of the generated waste fluids. We have attached copies of Waste Management's and Anterra's 2015 disposal records for the Facilities as Exhibit 1 to this letter. The records set forth, among other things, the manifest number, waste profile code, quantity, and the final disposal destination.

### **Historical Sumps at Aliso Canyon**

The 13267 Letter also requests information regarding "[h]istorical sumps [that] may no longer be in use or may not be readily visible due to grading or other changes over time ...." In 1991, Camp Dresser & McKee Inc. ("CDM"), conducted a Phase I environmental assessment of the Aliso Canyon Storage Facility for the previous owner of a portion of the facility, Texaco Exploration and Production ("Texaco"). CDM identified 13 known or suspected sump locations, based in large part on review of historical aerial photographs

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<sup>1</sup> The 13267 Letter defines "sump" as follows: "any open pit, pond, excavation, natural depression, or any other area serving as a receptacle for collecting and/or storing fluids or solid waste material from an oil and gas well or group of oil and gas wells. This includes all sumps (i.e., historic, active, temporary, and long-term)."

(CDM, 1991). Starting in 1996, SoCalGas engaged ENV America Incorporated ("ENV America") to, among other things, confirm the presence of the 13 sumps that were identified by CDM. (ENV America, 1998). These sumps were generally present in the eastern portion of the Aliso Canyon facility. Eco & Associates, Inc. ("Eco") also conducted an environmental investigation in January 2006 at historical sumps designated 14 through 23 within the western portion of the Aliso Canyon. We will be supplementing this response with a report from Eco summarizing its investigations at these sumps.

### **Historical Sumps at Honor Rancho, Montebello and Playa Del Rey**

As explained above, SoCalGas does not utilize sumps at its Honor Rancho, Montebello, or Playa Del Rey storage facilities for oil and gas production waste disposal. All of these facilities are used to store natural gas in depleted underground oil reservoirs. Natural gas is injected when supplies are abundant and prices are low. The gas is withdrawn from these Facilities during the fall and winter seasons when supplies are scarce and prices are high.

Further, based on our investigations to date, which have included discussions with the manager of each facility, SoCalGas does not have information to indicate the presence of historical sumps at Honor Rancho, Montebello, or Playa Del Rey storage facilities. We are continuing to investigate these facilities and, in the event it is determined that historical sumps were present at any of these facilities, SoCalGas will supplement this response with such additional information.

Please feel free to contact me directly if you have any questions about this response or need any further information.

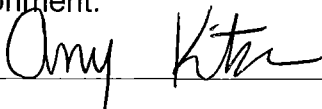
Sincerely,

Amy Kitson

Enclosures

### **Certification Statement**

I, Amy Kitson, certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the those individuals immediately responsible for obtaining the information, I believe that the information is true and accurate. SoCalGas is continuing its investigation to ensure the information is complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

  
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A  Sempra Energy® utility

February 18, 2016

**Subject:** Investigative Order No R4-2015-0300 – Technical Report – Historical Sumps at Aliso Canyon Storage Facility

### Overview

This Technical Report contains information regarding “[h]istorical sumps [that] may no longer be in use or may not be readily visible due to grading or other changes over time ...” at SoCalGas’ Aliso Canyon Storage Facility, 12801 Tampa Avenue, Northridge, CA 91326-1045. In 1991, Camp Dresser & McKee Inc. (“CDM”), conducted a Phase I environmental assessment of the site for the previous owner of a portion of the facility, Texaco Exploration and Production (“Texaco”). CDM identified 13 known or suspected sump locations, based in large part on review of historical aerial photographs (CDM, 1991). Starting in 1996, SoCalGas engaged ENV America Incorporated (“ENV America”) to, among other things, confirm the presence of the 13 sumps that were identified by CDM. (ENV America, 1997, 1998). Individual maps of Sumps 1 through 13 from ENV America’s report (the “ENV Report”) are included as Attachment 1 to this response. Eco & Associates, Inc. (“Eco”) also conducted an environmental investigation in January 2006 at historical sumps designated 14 through 23 within the western portion of the Aliso Canyon facility. We will be supplementing this Technical Report with a report from Eco summarizing its investigations.

The Regional Board’s Investigative Order No R4-2015-0300 further requests certain information regarding historical sumps, and SoCalGas’s specific responses follow:

### Specific Responses

**Regional Board Request:** *1) The locations of all current and historic sumps in your area of operations used in the discharge of fluids to land. Provide all information regarding liner material used with each sump, if any. Provide the status of all sumps, including active, inactive, closed with cleanup, closed without cleanup, or unknown. For sumps closed with cleanup, describe the cleanup activities and cleanup level.*

**Response:** SoCalGas does not operate or discharge to sumps onsite and cannot confirm that the historical sumps were in fact used in the discharge of fluids to land. SoCalGas has attached the complete ENV Report detailing the locations and investigative efforts at what is referred to as Sumps 1 – 13, generally located in the eastern portion of the Aliso Canyon facility. SoCalGas is continuing to investigate the

status of the sumps identified in the ENV Report and will be supplementing this Technical Report with additional information as appropriate (including, potentially, information responsive to the spreadsheet attached to Investigative Order No R4-2015-0300).

As explained above, Eco also conducted an environmental investigation of historical sumps designated 14 through 23 within the western portion of the Aliso Canyon facility. We will be supplementing this Technical Report with a report from Eco summarizing its investigations, and, potentially, information responsive to the spreadsheet attached to Investigative Order No R4-2015-0300.

Eco also assisted in closure activities at certain sumps at the Aliso Canyon facility. We have attached (Attachment 2) a report detailing closure activities at what is referred to as "Sump 2." We will also be supplementing this Technical Report with additional information from Eco regarding its closure activities.

We are continuing our investigation of historical sumps both at the Aliso Canyon facility and SoCalGas's other storage facilities and will provide additional responsive information if uncovered.

**Regional Board Request:** *2) The procedures you use to close or abandon sumps, or otherwise cease their operation.*

**Response:** As explained above, SoCalGas will be supplementing this Technical Report with additional information regarding closure activities at its Aliso Canyon facility.

We are continuing our investigation of historical sumps both at the Aliso Canyon facility and SoCalGas's other storage facilities and will provide additional responsive information if uncovered.

**Regional Board Request:** *3) The estimated total annual amount of fluid previously discharged into each historic and active sump, and estimated annual amount of fluid to be discharged to active sumps going forward.*

**Response:** SoCalGas does not operate or discharge to such historical sumps and it is not able to provide the requested information regarding historical fluid discharge. SoCalGas does not maintain any active sumps at the Aliso Canyon Storage Facility.

We are continuing our investigation of historical sumps both at the Aliso Canyon facility and SoCalGas's other storage facilities and will provide additional responsive information if uncovered.

**Regional Board Request:** *4) The physical and chemical composition of any fluids discharged into each sump.*

**Response:** SoCalGas does not operate or discharge to such historical sumps and it is not able to provide the requested information regarding physical and chemical composition of discharged fluids. We are, however, attaching the complete ENV

Report, which includes field testing data at certain historical sumps. SoCalGas does not maintain any active sumps at the Aliso Canyon Storage Facility.

We are continuing our investigation of historical sumps both at the Aliso Canyon facility and SoCalGas's other storage facilities and will provide additional responsive information if uncovered.

**Regional Board Request:** *5) The physical and chemical composition of any solidified waste in each sump.*

**Response:** SoCalGas does not operate or discharge to such historical sumps and it is not able to provide the requested information regarding historical solidified waste. We are, however, attaching the complete ENV Report, which includes field testing data at certain historical sumps. SoCalGas does not maintain any active sumps at the Aliso Canyon Storage Facility.

We are continuing our investigation of historical sumps both at the Aliso Canyon facility and SoCalGas's other storage facilities and will provide additional responsive information if uncovered.

**Regional Board Request:** *6) The location of any domestic, municipal, and commercial water wells within a half-mile radius of any current or historic sump.*

**Response:** SoCalGas has not identified any domestic, municipal, or commercial water wells within a half-mile radius of any historic sump at the Aliso Canyon Storage Facility. To confirm that there are in fact no domestic, municipal, or commercial water wells within the designated distance, we have requested well completion reports from the California Division of Water Resources. We are also using a third party consultant to investigate this issue. In the event it is determined that there are any such water wells, we will supplement this Technical Report with such information.

**Regional Board Request:** *7) Historic water quality data available for any wells within a half-mile radius of any current or historic sump. Attachment A lists the constituents we are most interested in for historical data (as well as current data).*

**Response:** SoCalGas has not identified any domestic, municipal, or commercial water wells within a half-mile radius of any historic sump at the Aliso Canyon Storage Facility. To confirm that there are in fact no domestic, municipal, or commercial water wells within the designated distance, we have requested well completion reports from the California Division of Water Resources. We are also using a third party consultant to investigate this issue. In the event it is determined that there are any such water wells, we will supplement this Technical Report with such information.

**Regional Board Request:** *8) Current sampling results for any wells within a half-mile radius of any current or historic sump. You are required to sample these wells for the constituents listed in Attachment A and submit the results in your technical report*

**Response:** SoCalGas has not identified any domestic, municipal, or commercial water wells within a half-mile radius of any historic sump at the Aliso Canyon Storage Facility.

To confirm that there are in fact no domestic, municipal, or commercial water wells within the designated distance, we have requested well completion reports from the California Division of Water Resources. We are also using a third party consultant to investigate this issue. In the event it is determined that there are any such water wells, we will supplement this Technical Report with such information.

**Regional Board Request:** *9) Locations, well construction, and survey data for any monitoring wells in the vicinity of any current or historic sumps, and water quality data associated with these wells.*

**Response:** SoCalGas has not identified any active monitoring wells at the Aliso Canyon facility. In the event it is determined that there are any such monitoring wells, we will supplement this Technical Report with such information.