



# **SAFETY OMBUDSMAN**

**Introductory Meeting**  
Richard J. Gentges



# Overview

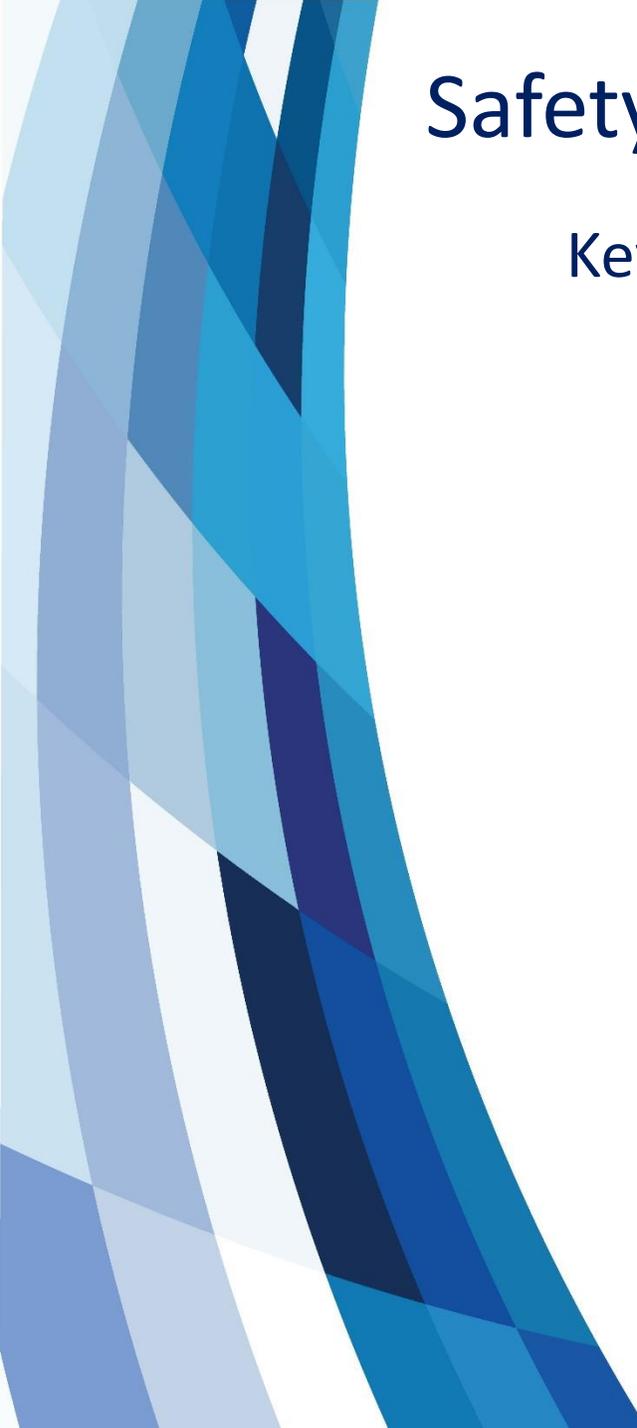
1. Safety Ombudsman Role
2. Consent Decree
3. Ombudsman Website
4. UGS Regulatory Requirements
5. Ombudsman Data Request
6. Next Steps



# Safety Ombudsman Role

## Experience/Background of Richard J Gentges

- Technical Expertise
- Industry Committees
- Industry Papers
- Safety Record
- Prior Role with SoCalGas



# Safety Ombudsman Role

## Key Elements of Role

- Safety/Transparency Advocate
- Totally Independent of SoCalGas
- Public/Regulatory Interface
- Investigate and Respond to Safety/Integrity Concerns
- Interface with SoCalGas Aliso Canyon Safety Committee

# Consent Decree

## Key Elements

- Methane Monitoring of Natural Gas Emissions
  - <https://socalgas.esriemcs.com/MethaneMonitoring/>
  - Reportable Threshold of 25 ppm Averaged Over 30 Minutes
  - Quarterly Reporting to Government Plaintiffs of 10 ppm Averaged Over 30 Minutes
- SoCalGas Internal Safety Committee (WSOC)
  - Eight Year Commitment - Quarterly Meetings
  - Focus on Well Integrity and Leak Prevention
  - Make Recommendations for Repairs/Improvements and Policies
  - Facilitate Role of and Work Cooperatively With Ombudsman

# Consent Decree – (cont.)

## Key Elements

- Safety Ombudsman
  - Independent Expert Subject to Approval of Government Plaintiffs
  - Participates in all WSOC Meetings
  - Access to All Non-Privileged Materials and Information
  - Review and Evaluate:
    - CPUC and DOGGR Audit Reports
    - Reportable Methane Emission Incidents
  - Review and Advise on WSOC's Findings and Recommendations
  - Receives and Investigates Safety Complaints – Public or Employee
  - Annual Public Meeting and Reporting Requirements
    - Attorney General, City Attorney, County Counsel, CPUC and DOGGR

# Consent Decree – (cont.)

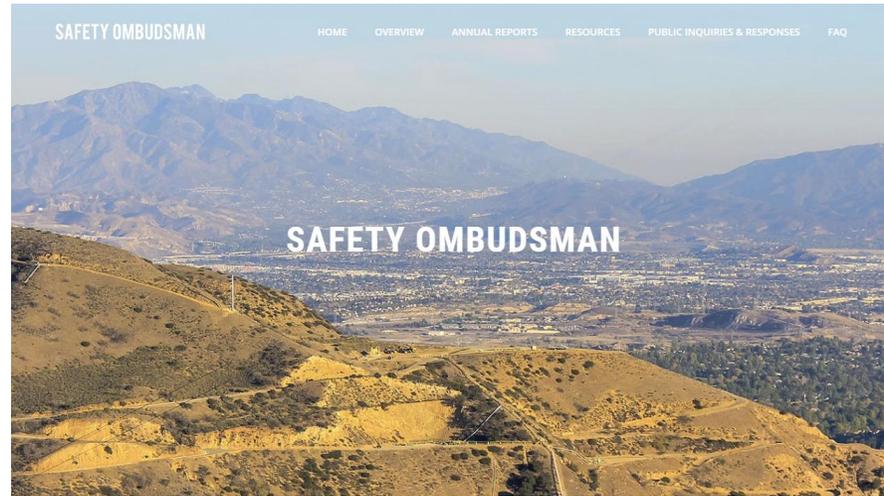
## Key Elements

- Rate Recovery
  - SoCalGas Prohibited From Seeking Recovery of Costs Associated With Ombudsman Role/Function

# Ombudsman Website

- Secure Portal to Report Safety Issues/Concerns
  - Open to Anyone – Members of Public or Employees
  - Provides Users the Option to Upload a File or Document
- Key Attributes of Website
  - Overview
  - Annual Reports
  - Resources
  - Public Inquiries and Responses
  - Frequently Asked Questions (FAQ)
  - Link: <https://safetyombudsman.com>

# Ombudsman Website



## WELCOME TO THE ALISO CANYON SAFETY OMBUDSMAN WEBSITE.

The purpose of this website is to provide a public portal for communicating safety-related complaints or concerns associated with the Aliso Canyon Natural Gas Storage Facility to the Safety Ombudsman. Complaints or concerns relating to the Aliso Canyon facility may be made either anonymously or in a non-anonymous manner. [Read More...](#)

### Submit Report or Concern

<input type="text" value="First Name"/>	<input type="text" value="Last Name"/>
<input type="text" value="Phone"/>	<input type="text" value="Email"/>
<input type="text" value="Report Description"/>	

#### Would you prefer to remain anonymous?

Yes, please do not use my name.

#### Request a Response

Yes, please contact me.

#### File Upload

No file chosen

PDF, JPG, PNG, TIF or GIF only.



ANNUAL REPORTS

# Ombudsman Website



Welcome to the Safety Ombudsman website. The purpose of this website is to provide a public portal for communicating safety-related complaints or concerns associated with the Aliso Canyon Natural Gas Storage Facility to the Safety Ombudsman. Complaints or concerns relating to the Aliso Canyon facility may be made either anonymously or in a non-anonymous manner. This website is not affiliated in any way with SoCalGas. Below and throughout this website are links to other useful information, including technical resources and reports related to underground gas storage facilities, state and federal regulations, annual reports generated by the Safety Ombudsman, and Frequently Asked Questions (FAQ).

The Safety Ombudsman is an impartial third-party subsurface gas storage industry expert charged with monitoring the safety of the Aliso Canyon facility. Impartiality ensures that safety-related complaints or concerns are addressed in a straightforward manner, honestly and objectively.

The Safety Ombudsman is completely independent of SoCalGas. The independence of the Safety Ombudsman is intended to help ensure openness and transparency so nearby residents, businesses, and the public at large can have confidence in the process of resolving safety-related complaints/concerns, report generation, and recommendations for improvements related to safety and prevention of leaks at the Aliso Canyon facility.

Key elements of the Safety Ombudsman's role include:

- Participation in quarterly meetings with the Aliso Canyon Well and Storage Operations Safety Committee (WSOC);
- Access to all non-privileged materials, information, records and work product necessary to accomplish the tasks required of the Safety Ombudsman;
- Reviewing audit or other reports relating to the Aliso Canyon facility prepared by the California Public Utilities Commission and/or the Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR);
- Reviewing and evaluating all incidents reported to the public and State and local agencies related to the Aliso Canyon fence-line methane emissions monitoring program;
- Reviewing and advising on the WSOC's efforts, findings and recommendations for safety improvements;
- Serving as a non-exclusive repository for safety-related concerns reported by the public with respect to the facility;
- Serving as a point of contact to receive safety complaints or concerns relating to the facility from anyone who wishes to remain anonymous, and providing such reports of safety concerns to SoCalGas;
- Maintaining the confidentiality of the person making any confidentially-made safety complaints or concerns related to the facility;
- Generating annual reports which detail the work of the Safety Ombudsman, WSOC, and recommendations, if any, for safety improvements and prevention of leaks at the facility;
- Providing the annual reports to the Attorney General, the City Attorney, County Counsel, CPUC, and DOGGR. These annual reports will also be made public via the Aliso Canyon Website and the local community shall be provided with an opportunity to comment;
- Scheduling at least one public meeting each year wherein the Ombudsman shall explain and respond to questions regarding the annual reports; and
- Investigating and responding to safety concerns or complaints related to the facility.

# Ombudsman Website



# Ombudsman Website



[PHMSA: Underground Natural Gas Storage: Key Documents](#)

[California Public Utilities Commission: Aliso Canyon Well Failure](#)

[California Department of Conservation: Oil, Gas, and Geothermal – Underground Gas Storage Regulations](#)

[California Department of Conservation: Test results of Aliso Canyon Wells](#)

[Aliso Canyon Wells](#)

[U.S. Energy Information Administration: Underground Natural Gas Working Storage Capacity](#)

[Report: Ensuring Safe and Reliable Underground Natural Gas Storage](#)

[California Council on Science & Technology: Natural Gas Storage](#)

[The Mechanism of Microbiologically Influenced Corrosion](#)

[SoCalGas: Latest News](#)

[SoCalGas: Aliso Canyon Current Infrared Methane Monitoring System](#)

[SoCalGas: Aliso Canyon Infrared Fence-Line Methane-Monitoring System FAQ and Information](#)

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## Downloads

[Notice of Lodging of Consent Decree – Southern California Gas Leak Cases](#)

# Ombudsman Website



See All Posts

## Submit Report or Concern

**Would you prefer to remain anonymous?**

Yes, please do not use my name.

**Request a Response**

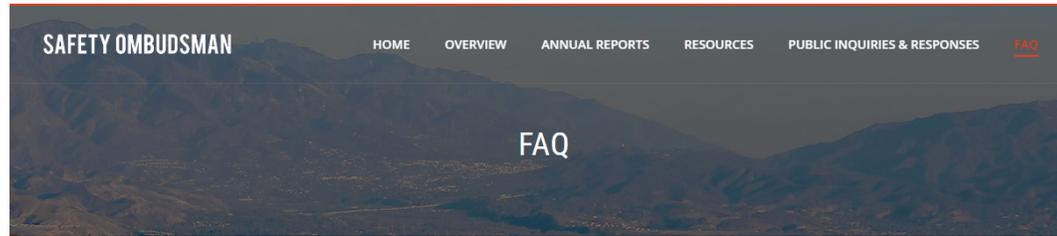
Yes, please contact me.

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# Ombudsman Website



## **#1 What is the role of the Safety Ombudsman?**

The Safety Ombudsman is an independent and impartial third-party underground gas storage expert whose role is to investigate safety concerns and/or complaints associated with the Aliso Canyon Natural Gas Storage Facility. The Safety Ombudsman is a neutral arbiter charged with reviewing and evaluating safety concerns or complaints relating to the Aliso Canyon facility independently of SoCalGas. Such independence is necessary to foster openness and transparency and provide the public with confidence in both the Safety Ombudsman and the review and evaluation process.

## **#2 Does the Safety Ombudsman function as a public advocate?**

Strictly speaking, no. Rather, the Safety Ombudsman is an advocate for safety and transparency. One of the primary roles of the Safety Ombudsman is to investigate safety-related concerns, questions, and complaints expressed by the public and respond to them in an unbiased and objective manner. Impartiality is foundational to the role of the Safety Ombudsman. Impartiality ensures that safety complaints and/or concerns are addressed in a straightforward manner, honestly and objectively, thereby resulting in high standards of probity and propriety in safety-related matters.

## **#3 Does the Safety Ombudsman report to anyone from SoCal Gas?**

No. The Safety Ombudsman functions completely independent of any direction from SoCalGas and is not supervised by, and does not report to, SoCalGas. However, SoCalGas is obligated by the Consent Decree to pay all costs and expenses incurred by the Safety Ombudsman and/or related to the Safety Ombudsman's role.

## **#4 Can the Safety Ombudsman investigate all complaints related to the Aliso Canyon facility?**

No. Generally speaking, the Safety Ombudsman can investigate safety concerns or complaints associated with the safety of the Aliso Canyon facility, and can follow up on concerns raised by the Well and Storage Operations Safety Committee. This includes, but is not limited to, those relating to well integrity and maintenance and associated unintended leak prevention, but excludes safety issues relating to occupational health and safety. The Safety Ombudsman does not have authority to investigate issues outside of those related to the safety of the facility.

## **#5 Does the Safety Ombudsman have access to information concerning the Aliso Canyon facility or will he have to work through some sort of legal process to obtain the information necessary to investigate a safety concern or complaint?**

The terms of the court-approved Consent Decree between SoCalGas, the Attorney General's Office, the Office of the City Attorney, and Los Angeles County Counsel provide that the Safety Ombudsman shall have access to all non-privileged materials, information, records, and work product in SoCalGas' possession, custody, or control necessary to accomplish the tasks required of him, which are outlined in Section 4.3 of the Consent

# Ombudsman Website – (cont.)

- Users Can Choose to Submit Issues/Concerns Either Anonymously or Provide Contact Information
  - Contact Information Will Remain Private Either Way
  - Contact Will Only Be Made If Issue/Concern Requires Clarification
- Responses to Issues/Concerns – How Will They Be Communicated?
  - Once Investigated and Resolved, All Issues Will be Posted to The Website
  - No One's Contact Information Will Be Revealed
  - Response Time Will Vary Depending on Complexity of Issue



# Underground Storage Regulatory Requirements

- Federal
  - Pipeline and Hazardous Material Safety Administration (PHMSA)
- State
  - California Division of Oil and Gas and Geo-thermal Energy (DOGGR)
  - California Public Utilities Commission (CPUC)

# Ombudsman Data Request

- Reportable exceedances of fence-line methane emissions;
- Copy of Risk Management Plan;
- Listing of wells which don't conform to 1726.5 of new DOGGR regulations;
- Results of annual noise and temperature survey data;
- Results of downhole casing inspections;
- Annual material balance analysis;
- Since October 1, 2018:
  - Listing of unintentional surface gas releases;
  - Summary of anomalous pressure readings;
  - Surface/subsurface safety valves which failed function test;
  - Wellhead leak detection program results.

# Next Steps

- Attendance at WSOC Meetings
- Responding to Issues/Concerns Posted to Website
- Annual Report – Late 2<sup>nd</sup> Qtr 2020
- Public Meeting – Mid-3<sup>rd</sup> Qtr 2020



# Questions?

<https://safetyombudsman.com/>  
[Ombudsman@SafetyOmbudsman.com](mailto:Ombudsman@SafetyOmbudsman.com)