



Annual Report Number 2
Work of the Safety Ombudsman
July 2020 – June 2021

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Overview

SoCalGas (Defendant) and the State Attorney General, City Attorney for the City of Los Angeles, County Counsel for the County of Los Angeles, and the County of Los Angeles (collectively referred to as Government Plaintiffs) entered into a Consent Decree to resolve claims raised by the Government Plaintiffs associated with the natural gas leak that occurred at the Aliso Canyon natural gas storage Facility (Facility) in October 2015. The terms and conditions of the Consent Decree required SoCalGas to, among other things, form an internal safety committee, and select and retain a third-party subsurface gas storage industry expert (Safety Ombudsman) who shall act as a safety advocate for the Facility. A copy of the Consent Decree may be accessed via this link: [Click Here](#)

Section 4.2 of the Consent Decree outlines the requirements for SoCalGas to establish a Well and Storage Operations Safety Committee (WSOC). The duties of the WSOC generally include, but are not limited to, the following:

- Meet quarterly to review safety issues at the Facility;
- Review operational safety issues and promote safe operations at the Facility consistent with applicable laws, rules, regulations, and orders;
- Review Facility-related information, materials, or work product to assess safety at the Facility;
- Make recommendations to SoCalGas for repairs, improvements, policies, and/or upgrades to the Facility or infrastructure therein;
- Facilitate the role of, and work in cooperation with, the Safety Ombudsman;
- In coordination with the Safety Ombudsman, conduct periodic safety audits or safety-related Strengths, Weaknesses, Opportunities, Threats (“SWOT”) analyses of the Facility; and
- Review California Public Utility Commission (CPUC) and California Department of Conservation Geologic Energy Management Division (CalGEM) audit reports of the Facility.

Section 4.3 of the Consent Decree outlines the requirements for SoCalGas to select and retain a Safety Ombudsman and the duties associated with that role. The duties of the Safety Ombudsman generally include the following:

- Participate in all Well and Storage Operations Safety Committee (WSOC) meetings;
- Have access to all non-privileged materials, information, records, and work product in SoCalGas’ possession, custody, and control necessary to accomplish the tasks required of the Safety Ombudsman;
- Review CPUC and CalGEM audit reports of the Facility;
- Review and evaluate all incidents reported to the public and State and local agencies pursuant to Section 4.1 of the Consent Decree;
- Review and advise on the WSOC’s efforts, findings, and recommendations for improvements;
- Serve as a non-exclusive repository for safety-related concerns reported by the public with respect to the Facility;



- Serve as a point of contact to receive safety complaints or concerns relating to the Facility from anyone who wishes to remain anonymous, and provide any anonymous reports of safety concerns to SoCalGas;
- Maintain the confidentiality of the person or member of the public making any confidentially made safety complaints or concerns relating to the Facility;
- Generate annual reports (Annual Reports) that detail the following:
 - The work of the Safety Ombudsman;
 - The work of the WSOC; and
 - Recommendations, if any, for improvements related to safety and prevention of leaks at the Facility.
- Provide the Annual Reports to the Attorney General, the City Attorney, County Counsel, the CPUC and CalGEM. The Annual Reports shall also be made public via the Aliso Canyon Website and the local community shall be provided with an opportunity to comment on the Annual Reports. The Safety Ombudsman shall schedule at least one public meeting each year to explain and respond to questions regarding the Annual Reports.

This report has been prepared in accordance with the requirements outlined in Section 4.3, (b), (ix), (1) of the Consent Decree, and summarizes the work of the Safety Ombudsman during the period of July 2020 – June 2021. It is the second such annual report.



I. WSOC Meeting Participation

During the period of July 2020 – June 2021, a total of four (4) WSOC meetings were held, all of which were conducted virtually. They occurred on the following dates:

- August 14, 2020;
- December 4, 2020;
- March 2, 2021; and
- June 10, 2021

The Safety Ombudsman participated in all four of the virtual meetings via video conference. The agenda for these quarterly meetings generally included the following:

1. Review and approval of the prior meeting minutes;
2. Update from Safety Ombudsman concerning public inquiries and other relevant topics;
3. Update from WSOC members concerning safety related matters associated with the Aliso Canyon Facility;
4. CalGEM audit status; and,
5. Joint discussion of other relevant matters related to the Aliso Canyon Facility.

The meetings provide a forum for face-to-face discussions between the WSOC members and the Safety Ombudsman on safety-related matters at the Facility. Topics vary from meeting to meeting depending upon current issues, maintenance and construction work activity at the Facility, and safety concerns. Members of the WSOC typically provide updates of construction and/or maintenance work at the Facility with the emphasis on safety, the status of ongoing discussions with CalGEM staff concerning SoCalGas' Risk Management Plan for the Facility, and the status of periodic audits of the Facility by CPUC and CalGEM staff. These updates provide an opportunity for the Safety Ombudsman to probe any safety concerns and establish a dialog directly with the appropriate subject matter experts. They also provide an opportunity for direct feedback to the WSOC concerning committee work or other safety-related initiatives at the Facility. During the period of July 2020 – June 2021 discussion topics included, but were not limited to:

- The development of additional and enhancement of existing Gas Standards relevant to the safety of underground natural gas storage facilities;
- Preparation of the Safety Ombudsman Annual Reports;
- Audits performed by the WSOC examining adherence to SoCalGas' Gas Standards;
- Status of CalGEM/PHMSA audit report from October 2020;
- SIMP (Storage Integrity Management Program) Reassessments/Update
- Status of review of the Aliso Canyon Risk Management Plan (RMP) with CalGEM;
- Safety Ombudsman virtual public meeting in November 2020;
- Concerns/Issues submitted to the Safety Ombudsman by members of the public;
- Recommendations for safety improvements generated by the Safety Ombudsman;



- SoCalGas action plan in response to Safety Ombudsman’s 2020 recommendations for improving safety;
- Well assessment/re-assessment updates;
- 2021 CalGEM audit schedule;
- PHMSA Project; Risk Assessment and Treatment of Wells; and,
- Status of seismic risk events study.

Individual links to the minutes of the WSOC meetings are included immediately below (June 2021 meeting minutes are not yet available as of the date of issuance of this report). Names of individuals have been redacted from the meeting minutes.

- August 2020 meeting minutes link: [Click Here](#)
- December 2020 meeting minutes link: [Click Here](#)
- March 2021 meeting minutes link: [Click Here](#)

II. Safety Ombudsman Virtual Public Meeting – November 2, 2020

The terms of the Consent Decree require that the Safety Ombudsman provide three Annual Reports to the Attorney General, the City Attorney, County Counsel, the CPUC, and CalGEM. The Safety Ombudsman is also required to make available to the public for review and comment a copy of each of the three Annual Reports, and schedule at least one public meeting each year wherein the Safety Ombudsman shall explain and respond to questions regarding the Annual Reports. The three reports provide an overview of the following:

1. The work of the Safety Ombudsman;
2. The work of the WSOC; and,
3. Recommendations, if any for improvements related to safety and prevention of leaks at the Facility.

All three Annual Reports covering the period April 2019 - June 2020 were posted to the Safety Ombudsman website on October 26, 2020, for public access and viewing. Notice of the posting was provided via email to approximately three dozen groups/parties whose contact information was supplied by SoCalGas’ Public Affairs Group; notice was also provided to representatives from the CPUC and CalGEM. The individuals/groups who received the meeting notice were the same groups included in SoCalGas’ public outreach initiative associated with the Aliso Canyon incident. The email notice included information concerning a virtual public meeting to be hosted by the Safety Ombudsman on November 2, 2020, at 6:00 pm. The purpose of the meeting was to provide an overview of the work performed by the Safety Ombudsman from April 2019 – June 2020 (review period), as detailed in three Annual Reports.

The virtual meeting included a 30-minute presentation covering the three reports mentioned above, followed by a 90-minute question/answer period. The presentation included an overview of the Safety Ombudsman’s professional experience and the role of the Safety Ombudsman. Only two participants logged into and joined the virtual meeting.

During the presentation, the Safety Ombudsman provided an overview of the information contained in each of the three Annual Reports. At the end of the presentation, meeting participants were invited to raise

This unredacted draft report is not for release to the public and may contain information which is confidential, security sensitive, or trade secrets of a party.



questions or concerns regarding the Annual Reports, or any other relevant issue. Meeting participants were also offered the opportunity to post their questions directly to the Safety Ombudsman website and were advised that a formal response would be posted to the website. No questions/concerns were raised at the end of the presentation, nor were any subsequently posted to the website. A copy of the presentation was posted on the Safety Ombudsman website.

III. Safety Ombudsman Data Requests

The Consent Decree stipulates 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 Ombudsman's tasks. SoCalGas is prohibited from unreasonably denying the Ombudsman access to such information or withholding information based on a privilege not supported by applicable law.

Four data requests (numbers 7-10) were submitted to SoCalGas during the period of July 2020 - July 2021. A total of six (6) data requests were submitted to SoCalGas during the period from March 2019 – June 2020 and were reviewed in detail in the 2020 Safety Ombudsman's Annual report; thus, they will not be covered in this report. Several of the requests addressed in the 2020 Annual Report pertain to data or information that is collected on an on-going basis, or that is programmatic. Thus, the Safety Ombudsman anticipates requests for the same or similar information will be made in the future to track SoCalGas' integrity monitoring progress.

The scope of the most recent data requests generally covered various facets of operations related to storage well integrity and maintenance and associated unintended leak prevention. The requests included but were not limited to information relating to operating data, integrity data, internal and external audits, data related to the leak event which extended from October 2015 – February 2016, and SoCalGas' gas standards. The responses provided by SoCalGas aid in responding to safety issues/concerns raised by the public and serve to inform the Safety Ombudsman of potential safety issues warranting discussion with the WSOC.

Data Request number 7 was submitted to SoCalGas on August 10, 2020. This data request was developed in response to a concern/complaint submitted to the Safety Ombudsman website on July 14, 2020. There was a total of four (4) specific requests contained in this data request, each of which was directed toward information covering a specific period. The requested information included the following:

1. Please provide me with the dates on which SoCalGas' fence line methane monitoring system detected any methane emissions since October 14, 2019; please include with the dates the actual emission levels for each of the eight monitoring stations, including those below the threshold reporting level of 25 ppm averaged over 30 minutes.
2. Please provide me with the dates on which any of the five area methane monitors (3 on the south side of the Aliso Canyon property and two on the north side) registered methane emissions since these monitors were placed into service on August 6, 2019. Please include the actual emission levels for each monitor and for the duration of the emission period.
3. Please provide me with a listing of any well which detected methane emissions from either the wellhead lower explosive limit (LEL) sensor or the adjacent lateral pipeline LEL sensor since the



date of installation of these wellsite monitors. Please include the actual LEL readings to the extent those readings are recorded.

4. Please provide me with a copy of all material safety data sheets (MSDS) for all chemicals, additives, and materials (both solid and liquid) that were used in making any fluids which were pumped into the SS-25 well during the seven attempts to kill that well between October 23, 2015 and February 11, 2016, and any fluids which were pumped into the P-39A relief well for the purpose of killing the SS-25 well.

SoCalGas provided a response to each of the above four questions on October 6, 2020. SoCalGas' response to Data Request Number 7 and the supporting data may be accessed via these links:

- [Click Here](#)

In reviewing their responses, particularly the supporting data, it became clear that additional questions would need to be addressed to clarify what the data reflect. Thus, a subsequent request (Data Request 7A) was made to SoCalGas seeking such clarification. That request was made on October 16, 2020, and a response was received on October 30.

Data Request 7A included the following requests for information:

1. Can you confirm that the "peak" readings for the fence line methane readings are simply the highest readings that were detected during the period indicated for each event when readings exceeded 2 ppm?
2. For the five ambient area methane monitors are the readings in ppm? Also, the readings are listed once each hour- are they instantaneous spot readings or do the figures reflect a 60-minute average?
- 3A. For the LEL readings on the wellhead and laterals, are the readings in ppm?
- 3B. SS44B well and its lateral do not have any readings; can you explain why that is?
- 3C. It appears that methane levels are recorded at five-minute intervals. Are the readings a five- minute average or a spot reading?
- 3D. Several wells have large gaps in the data, often several hours or more in between methane readings, why is that?

SoCalGas' response to Data Request Number 7A may be accessed via this link:

- [Click Here](#)



Data Request Number 8 was submitted to SoCalGas on February 26, 2021. This data request consisted of eight (8) questions, one of which was a supplemental request sent to SoCalGas on March 1, 2021. Several of the questions included sub-requests. The requested information generally consisted of the following:

1. The steps SoCalGas has taken or plans to undertake concerning implementation of each of the six recommendations contained in the Safety Ombudsman's 2020 Report – Recommendations for Improvements;
2. Whether SoCalGas is currently utilizing a quantitative risk assessment model. If not, whether they intend to evaluate a PHMSA-funded quantitative risk assessment developed by Battelle/Sandia for the gas storage industry if SoCalGas determines the model would enhance safety at the Aliso Canyon facility;
3. An update of the results of SoCalGas' casing inspection program, including defect characterization and the calculated remaining life of each well based on the worst defect that was identified;
4. A status report of a planned corrosion control study referenced by SoCalGas in its response to Data Request Number 5, Questions 3 and 4, including the overall scope of the study, a complete listing of the study objectives, and any recommendations for safety improvements resulting from the study;
5. A copy of SoCalGas' 2020 (or its most recent) annual material balance analysis/study, including a summary of the conclusions related to containment of the stored gas inventory, and/or any suspected losses or unaccounted for gas inventory, and recommendations for any follow-up actions;
6. Any anomalous gas pressure readings (i.e., those which exceed the thresholds associated with SoCalGas' Pressure Monitoring Standard for tubing and tubing casing annulus) which occurred during the 2020 calendar year, the cause of the anomaly, and corrective actions taken;
7. A listing of wells which experienced a wellhead leak during the 2020 calendar year which exceeded the reportable thresholds listed in CalGEM's UGS regulations under Section 1726.9(a)(1) and (2), including a summary of the corrective actions taken for each well; and,
8. Data associated with a February 25, 2021, possible leak event detected by the Aliso Canyon fence line methane monitoring system. The event was detected by the number 6 monitoring station.

SoCalGas provided a response to each question contained in this data request on April 13, 2021. The responses received were, in general, adequate to inform the Safety Ombudsman of the desired information.

SoCalGas' response to Data Request Number 8 may be accessed via these links:

- [Click Here](#)



Data Request 9 was submitted to SoCalGas on July 7, 2021. This data request sought to determine the status of any planned CPUC audits of the Aliso Canyon Facility during 2021 and the status of the CalGEM audit of the Aliso Canyon Facility that was conducted in October 2020. The questions were as follows:

1. When I last spoke with the CPUC they indicated that the next safety audit/inspection of Aliso Canyon would not occur until sometime this year.
 - a. Has an audit/inspection of the Aliso Canyon Facility by CPUC been conducted this year?
 - b. If not, has one been scheduled? If an audit/inspection has been completed by CPUC, have they issued a report of their findings? If so, please provide me with a copy of same.
2. During the December 4, 2020, WSOC meeting it was reported that CalGEM conducted a virtual audit of Aliso Canyon in October 2020.
 - a. What date(s) was the audit performed?
 - b. What was the scope of the audit?
 - c. Please provide the list of questions CalGEM used that formed the basis for the audit.
 - d. Has CalGEM (or PHMSA) issued a final report to SoCalGas? If so, please provide me with a copy of same.
 - e. Did a representative from the CPUC attend and/or participate in the CalGEM audit?

SoCalGas provided a response to each question contained in this data request on July 21, 2021. The responses received were, in general, adequate to inform the Safety Ombudsman of the desired information.

SoCalGas' response to Data Request Number 9 may be accessed via these links:

- [Click Here](#)
- [Click Here](#)
- [Click Here](#)
- [Click Here](#)

Data Request 10 was submitted to SoCalGas on July 8, 2021. This data request sought to determine the status of the Casing and Tubing Inspection Field Procedure audit and whether the WSOC had made any recommendations for safety improvements during the month of June 2021. The questions were as follows:

1. Can you please provide me with a status update on the Casing and Tubing Inspection Field Procedure Audit?
 - a. My notes from the March 12 meeting also indicate an Excel spreadsheet listing the specific sections of GS 224.106 that the audit team would focus on in verifying compliance with that standard would be provided, including the list of wells that we agreed to audit. I would appreciate it if SoCalGas would forward these two items to me as soon as possible.
2. In May I had asked whether the WSOC had submitted any recommendations for safety improvements to SoCalGas up to that point in time. Did the Committee submit any recommendations during the month of June?



SoCalGas provided a response to each question contained in this data request on July 21, 2021. The responses received were, in general, adequate to inform the Safety Ombudsman of the desired information.

SoCalGas' response to Data Request Number 10 may be accessed via these links:

- [Click Here](#)
- [Click Here](#)

IV. California Public Utility Commission (CPUC) and California Department of Conservation Geologic Energy Management Division (CalGEM) Audit Reports

SoCalGas is subject to regulation by the CPUC. Among other things, the CPUC has safety jurisdiction over the operation of the Facility, and specifically the surface facilities/equipment. The Safety Enforcement Division (SED) of CPUC conducted a Comprehensive Operation and Maintenance Inspection of the Aliso Canyon Facility on April 5-9, 2021. In a letter dated June 8, 2021, SED provided a summary of their inspection findings, SoCalGas' responses to SED's findings, and SED's evaluation of SoCalGas' response to the findings. The summary outlined one (1) violation and four (4) areas of concern that were noted during the April 5-9 inspection by SED. SED's June 8 letter served as official closure of the inspection and response process. A copy of SED's letter may be accessed via this link:

- [Click Here](#)

SoCalGas is also subject to regulation by CalGEM. Safety oversight of sub-surface underground natural gas storage facilities such as Aliso Canyon is vested with CalGEM. Thus, CalGEM's jurisdiction is limited to the gas storage wells and sub-surface facilities at the Aliso Canyon Facility. The regulations include construction, operation and maintenance, monitoring, and safety requirements for the storage wells and storage reservoir.

CalGEM's regulations for underground natural gas storage wells and reservoirs meets, and in many cases exceeds, federal safety regulations that were implemented by the Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) in January 2018. CalGEM entered into an agreement with PHMSA to act as its agent for safety inspections of the Facility, though PHMSA retained safety enforcement authority. PHMSA's authority includes reviewing CalGEM's findings/recommendations prior to issuance of their inspection report to SoCalGas.

CalGEM, acting as an agent for the federal PHMSA Office of Pipeline Safety (OPS), coordinated and conducted a general safety inspection of the Facility during the period from October 20 – 23, 2020. The inspection was conducted virtually due to COVID-19 restrictions. The scope of their inspection focused on Procedures and Training, Risk Management, and Rules & Frequently Asked Questions (FAQs). A total of 56 questions were associated with these inspection topics. CalGEM also posed four (4) additional follow-up questions related to their 2019 inspection of the Aliso Canyon Facility. A copy of the question set may be accessed via this link:

- [Click Here](#)



As of the date of this report, the findings of the inspection by CalGEM have not yet been released to SoCalGas. The findings and items of concern, if any, will be reviewed with the WSOC and will be addressed in the next annual report issued by the Safety Ombudsman.

V. Safety Ombudsman Review and Evaluation of Incidents Involving Methane Emissions Above Threshold Levels

The Safety Ombudsman is charged with review and evaluation of all incidents reported to the public and State and local agencies pursuant to Section 4.1 of the Consent Decree. Section 4.1 addresses methane emissions detected by a fence line methane monitoring system installed at the Facility to detect and monitor methane emissions that may be associated with the leakage of stored natural gas from the Facility.

The monitoring system detects and records methane concentrations in real time. If methane concentrations exceed 25 parts per million (ppm) averaged over a 30-minute period SoCalGas is required to provide public notice on the Aliso Canyon Website, including a general explanation as to the cause of the detection and the responsive actions taken, if any. They are also required to notify the Government Plaintiffs of the detection(s), their responsive actions, and that they have posted the same information on the Aliso Canyon Website. Lastly, SoCalGas is required to submit quarterly reports to the Government Plaintiffs each time during the quarter that the fence line monitoring system detects methane concentrations in excess of 10 ppm averaged over any 30-minute period. The same reporting obligations exist for this level of exceedance as noted above, i.e., identification of the cause of the detection and responsive action(s). Normal background methane level is approximately 2 parts-per-million (ppm).

During the period of July 2020 – June 2021 there was one (1) event/incident when the fence line methane monitoring system detected methane concentrations meeting the 25 ppm criteria. The event occurred on February 25, 2021.

On February 25 at approximately 4:55 a.m., the methane detector in Area 6 detected methane levels above background. Methane readings rose to approximately 14 ppm for a period of approximately five minutes before increasing to 25 ppm for an additional five minutes. Thereafter, readings declined to normal background level. The detector in Area 7 also detected slightly elevated methane readings during this same period, with methane readings of 3-4 ppm before returning to normal background level.

The Safety Ombudsman noted this detection event and requested information concerning it from SoCalGas, as required by the Consent Decree. The requested information for the event included:

- PPM readings for all 8 of the fence line methane monitors for the period extending 2 hours prior to methane levels climbing above background level through the period when methane levels returned to normal background level;
- A summary of actions taken by SoCalGas in response to the elevated concentrations;
- A summary of the causative factors; and
- If the exceedance was not caused by methane leakage, how SoCalGas made that determination and confirmed it.

The actual data request and SoCalGas' response is contained in Question No. 8 of Data Request Number 8, dated February 26, 2021. The ppm methane concentration readings of all 8 methane sensors associated



with the February 25, 2021, event including the prevailing wind conditions at the time of the event may be accessed via this link: [Click Here](#)

Based upon the information SoCalGas supplied to the Safety Ombudsman, the timing of this methane detection event coincided with a valve sequencing error which resulted in the shut-down of an electronically driven compressor unit. While depressurizing the compressor station, a valve was erroneously closed which activated a relief valve (causing it to open as designed) and shutting down a compressor unit. The open relief valve vented gas contained in the station piping to the atmosphere. The resulting gas plume was detected by the Area 6 and 7 methane monitors, both of which are located downwind of the compressor station under the then prevailing wind conditions. Thus, it appears the elevated methane readings on February 25, 2021, reflected a brief transient event which was unrelated to leakage of methane from the wells or reservoir. No further action was necessary.

VI. Review and Advise on the WSOC's Efforts, Findings, and Recommendations for Improvements

The Safety Ombudsman duties include reviewing and advising the WSOC on their efforts, findings, and recommendations for improvements at the Aliso Canyon Facility. The specifics of this obligation are outlined in a separate report, Annual Report Number 2 – Work of the Aliso Canyon Well and Storage Operations Safety Committee, Section III and Annual Report Number 2 – Recommendations for Improvements Related to Safety and Leak Prevention, Section II, and will not be repeated here.

VII. Safety-related Concerns Reported by the Public

The Safety Ombudsman functions as a non-exclusive, confidential repository for safety-related concerns related to the Facility and which are reported by the public, including employees of SoCalGas. The Safety Ombudsman maintains strict confidentiality of anyone who submits a safety concern or complaint regarding the Facility. Anyone who submits a concern or complaint has the option of providing their contact information or remaining completely anonymous. For those who elect to provide contact information, their identity and contact information is known only to the Safety Ombudsman and is never revealed. Providing contact information affords the opportunity for the Safety Ombudsman to contact the individual who submitted the complaint and clarify the issue, as necessary. This, in turn, helps facilitate the review/investigation process and fully respond to the issue.

During the period from July 2020 – June 2021 one (1) concern was submitted to the Safety Ombudsman. The concern was first reviewed to confirm whether the issue fell within the Safety Ombudsman's scope/purview. A response was posted on the Safety Ombudsman website at the conclusion of the investigation. The Safety Ombudsman reached out to the individual who raised the concern via email as well as telephonic communication alerting them that the issue would be investigated and again at the conclusion of the investigation.

The Safety Ombudsman received the following request for assistance on July 14, 2020:

"I have severe problems breathing when I am on the hill adjacent to your Aliso Canyon Facility. Please tell me what chemicals are escaping into the air so that I may give to my pulmonologist. Thank you."



The response to this concern is posted on the Safety Ombudsman website and may be accessed via this link: [Click Here](#)