



Annual Report Number 7
Work of the Safety Ombudsman
July 2025 – June 2026

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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 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.
- Review California Public Utilities 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 include the following:

- Participate in all 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 to provide any anonymous reports of safety concerns to SoCalGas.

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- Maintain the privacy of the person or member of the public confidentially making safety complaints or concerns relating to the Facility.
- Generate annual reports (Annual Reports) that detail the following:
 - o The work of the Safety Ombudsman.
 - o The work of the WSOC.
 - o Recommendations, if any, for improvements related to safety and prevention of leaks at the Facility.
- Provide the Annual Reports to the State 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 (1) public meeting each year to explain the Annual Reports and respond to questions.

This report has been prepared in accordance with the requirements outlined in Section 4.3, (b), (ix), (2) of the Consent Decree, and summarizes the work of the Safety Ombudsman during the period of July 2025 – June 2026. It is the seventh such annual report.



I. WSOC Meeting Participation

Four (4) WSOC meetings were held during the July 2025 – June 2026 period, as noted below:

- September 16, 2025 (virtual)
- December 3, 2025 (in person)
- March 19, 2026 (virtual)
- June 25, 2026 (in person)

The Safety Ombudsman participated in all meetings, including in person at the December and June meetings. The quarterly meeting agenda includes:

1. Review and approval of the prior meeting minutes.
2. Update from the 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. Pipeline and Hazardous Materials Safety Administration (PHMSA)/CalGEM audit status.
5. Joint discussion of other relevant matters related to the Aliso Canyon Facility.

The meetings provide a forum for 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 provide updates on 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. The WSOC meetings provide an opportunity for the Safety Ombudsman to probe any safety concerns, establish a dialog directly with the appropriate subject matter experts, and give feedback to the WSOC concerning committee work or other safety-related initiatives at the Facility.

During the period of July 2025 – June 2026, discussion topics included but were not limited to:

- Presentation and discussion of a general safety theme at the start of each meeting, including incidents from the natural gas pipeline and gas storage industry.
- Status of Data Requests from the Safety Ombudsman and subsequent SoCalGas responses.
- Preparation of the Safety Ombudsman Annual Reports and public interactions, including any concerns, issues, or complaints submitted to the Safety Ombudsman by members of the public.
- Recommendations of the WSOC and/or the Safety Ombudsman and the status of SoCalGas plans in response to the recommendations.
- Status of the PHMSA/CalGEM audits through the July 2025 – June 2026 period.
- Status of the Aliso Canyon Risk Management Plan (RMP), well integrity assessments, and individual well reassessment period adjustments granted by CalGEM.
- Status of subsurface safety valve installation and operation at Aliso Canyon wells.
- SoCalGas plans responsive to new and updated regulations.

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Meeting Minutes

Individual links to the minutes of the WSOC meetings are included immediately below.

- September 2025 meeting minutes link: [Click Here](#)
- December 2025 meeting minutes link: [Click Here](#)
- March 2026 meeting minutes link: [Click Here](#)
- June 2026 meeting minutes link: [Click Here](#)

In alignment with the WSOC Charter, selected changes in membership occurred during the 2025-2026 period.

At the June 2026 meeting, the Safety Ombudsman requested that agenda items for WSOC meetings during the 2026-2027 period include updates and discussions on:

- Gas inventory analysis
- Plugged well and third-party well assessment and monitoring
- Reservoir integrity and risk assessment
- Progress on Human Factors assessments

The recommended topics are addressed in more detail in Annual Report Number 7 – Recommendations for Improvements Related to Safety and Leak Prevention, which can be found at this link: [Click Here](#)

The WSOC agreed to take up the topics in the 2026-2027 period as suggested by the Ombudsman.

II. Safety Ombudsman Virtual Public Meeting – October 15, 2025

The terms of the Consent Decree require that the Safety Ombudsman provide three (3) Annual Reports to the State Attorney General, the City Attorney, County Counsel, the CPUC, and CalGEM. The Safety Ombudsman is required to make available to the public for review and comment a copy of each of the three (3) Annual Reports and schedule at least one (1) public meeting each year, wherein the Safety Ombudsman shall explain the Annual Reports and respond to questions. The three (3) reports provide an overview of the following:

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

Previous Annual Reports One through Six inclusive were posted to the Safety Ombudsman website prior to the annual public meetings.

The July 2024 – June 2025 period Annual Reports were posted on September 23, 2025, and notice was provided on the same day via email to approximately two dozen representatives from the CPUC, CalGEM, and the city and county of Los Angeles; to other state agents as applicable; and to approximately three dozen groups/parties whose contact information was supplied by SoCalGas' Public Affairs Group. The individuals/groups who received the meeting notice included those in SoCalGas' public outreach initiative associated with the Aliso Canyon Facility incident. The email notice included information concerning a



virtual public meeting to be hosted by the Safety Ombudsman on October 15, 2025, at 6:00 pm. The purpose of the meeting was to provide an overview of the work performed by the Safety Ombudsman during the July 2024 – June 2025 period, as detailed in three (3) Annual Reports.

The annual public meeting was held virtually on October 15, 2025; several members of the public attended. The meeting lasted 1.5 hours, including a question-answer period following the Safety Ombudsman's summary presentation covering the Ombudsman's professional experience, the role of the Ombudsman, and a review of the three (3) annual reports. Meeting participants were invited to raise questions or concerns at any time regarding the Annual Reports, or any other relevant issue, and to post their questions directly to the Safety Ombudsman website. The public meeting materials with the recording of the meeting were posted to the Ombudsman website as the "Safety Ombudsman Virtual Townhall Meeting 2025" and can be found at the following link: [Click Here](#).

One (1) meeting attendee provided positive feedback on SoCalGas progress and plans to install deeper set safety valves, although the attendee had follow-up questions on SoCalGas' risk assessment process maturity and how that related to Position Paper S_POS.002, and on depth of subsurface safety valve placement with respect to faults and with respect to design and reliability. The Ombudsman met virtually with the questioner on October 23, 2025, to verify the Ombudsman's understanding of the questions. The Ombudsman then developed Data Request #24, summarized below in [Section III](#) of this Report.

The Ombudsman will host a virtual meeting in Q4 of 2026 covering the Annual Reports posted for the period July 2025 – June 2026.

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.

The Safety Ombudsman made Data Requests #24 and #24A during the July 2025 – June 2026 period. Prior data requests and responses have been reviewed in previous annual reports and are not covered in this report.

Data Request (DR) #24

The Ombudsman delivered Data Request (DR) #24 on November 20, 2025, containing four (4) questions regarding:

- The status of Position Paper S_POS.002 relative to the progress of SoCalGas' risk assessment process.
- The subsurface safety valve system manufacturer's reliability information.
- The relative threat level of fault movement for faults deeper than the Younger Santa Susanna Fault.
- The nature/range of debris and deposits experienced in wells related to the flow composition and physical flow regime in Aliso Canyon wells.



SoCalGas responded on February 2, 2026. DR #24 questions and SoCalGas responses can be found at this link: [Click Here](#). Some of the materials provided in addition to the SoCalGas response are not linked here since they required more information or editing and were the subject of part of Data Request #24A discussed below.

Summary Analysis and Opinion of the Ombudsman Following DR#24 Responses

The Ombudsman reviewed the SoCalGas responses to Data Request #24, including discussion with SoCalGas representatives at the March 19, 2026 WSOC meeting. The Ombudsman's conclusions, opinions, and recommendations are summarized below.

DR 24 Q1 - Update of Position Paper S POS.002 "Employment of surface and subsurface automatic or remote actuated safety valves"

SoCalGas provided the latest version of the subject paper, dated 11/18/25. The paper addresses all SoCalGas storage facilities, with specifics on the status of current/planned Aliso Canyon well Subsurface Safety Valve (SSSV) installations, and includes a safety valve Decision Tree process flow chart and a detailed data set of inputs to risk-based decision for Aliso Canyon wells.

The Ombudsman discussed with SoCalGas at the March 19, 2026 WSOC meeting the following notes and questions:

- *p2 – Should reference to API 1171 2nd Edition (Nov 2022), since the PHMSA Gas Storage Safety Rule will require that version of the API standard in 2026, enforceable on January 1, 2027*
- *p5 – Discussed with SoCalGas whether the safety valve installation and servicing was included in safety/environmental risk analysis*
- *p6 – Noted potential discrepancies as page 6 states 10 safety valves are in Aliso Canyon wells and 49 additional installations are planned, but p7 states 13 are in and 45 are planned, whereas p10 states safety valve applications are "under review."*
- *Noted for purposes of the Ombudsman and the Consent Decree that discussions in the paper of Honor Rancho, La Goleta, and Playa Del Rey fields and wells should be redacted.*

DR 24 Q2: Manufacturer's safety valve system component reliability information.

SoCalGas provided Halliburton's document on tubing retrievable safety valve (TRSV) life estimate and reliability.

The Ombudsman discussed with SoCalGas at the March 19, 2026 WSOC meeting the following:

- *How does SoCalGas understand and interpret the life estimate P10, 50, 90 vs percent reliability?*
- *The Halliburton y-axis scaling values on reliability curve chart (slide 3 of the Halliburton document) are confusing, as the chart seems to show a different reliability than that stated in the text.*



DR 24 Q3 - Fault movement threats for faults deeper than the Younger Santa Susanna Fault

SoCalGas addressed two groups of deep-seated faults, concluding that the potential threat caused by both groups is low.

Reservoir boundary faults, which include the Frew and Sub-Frew (west boundary, intersecting 15 wells combined), Ward (north boundary, intersecting 4 wells), and Roosa (north boundary of shallower Pliocene formations, intersecting 12 wells), are not active and intersect fewer wells than the Santa Susana Faults, consequently posing a low threat.

For the second fault group, including the Northridge Blind Thrust Fault, SoCalGas concludes that because this system is somewhat remote from and deeper than the Aliso Canyon reservoir, the main threat related to this fault system is a secondary, shallower event from potential landslides.

The Ombudsman discussed the Northridge Blind Thrust Fault with SoCalGas at the March 19, 2026 WSOC, asking whether the potential threat is estimated as low because of the assessed mitigation effects of Subsurface Safety Valves (SSSV) already in place or is it low even prior to accounting for mitigation effects of SSSV? Perhaps it would be meaningful to show an example of the relative risk from a Northridge event to a well w/ and w/o a subsurface safety valve. This question went into DR-24A.

DR 24 Q4 - Nature/range of debris and deposits related to the flow composition and physical flow regime in Aliso Canyon wells

SoCalGas responded that they have not observed significant solids collecting and/or causing functionality or performance problems with downhole well equipment.

After discussions of the DR 24 responses and the Ombudsman's assessment and questions, SoCalGas requested that the Ombudsman submit a follow-up Data Request; refer to [Data Request #24A](#) below.

Additionally, with respect to subsurface safety valve applications in Aliso Canyon wells, it is worth repeating the Ombudsman's comments in Annual Report Number 6 – Work of the Safety Ombudsman which can be found at the following link: [Click Here](#)

"The Ombudsman's opinion is that the SoCalGas risk assessment has reached a state of maturity to enable identification of those wells with greater susceptibility to fault displacement and/or to shallower-seated landslide mass movement. ...SoCalGas' own risk analysis identifies those wells with higher environmental risk that would or could result from a well flowing uncontrollably to the surface or near surface, and the risk analysis identifies the net risk benefit to the SSSV installation, given potential decreases to environmental risk but potential increases to life safety risk due to an increased number of well workovers related to treating SSSV reliability issues. It is the Ombudsman's opinion that the current state of SoCalGas' well risk analysis methodology brings a credible clarity to the decision-making regarding SSSV installation. The ability to make risk-informed, values-based decisions regarding installation and placement depth of SSSV, using enhanced knowledge of well-specific conditions, is a satisfactory safety improvement outcome."

"The efficacy of the new SSSV installations depends on reasonably good reliability of the SSSV. ...SoCal's Gas Standard 224.0000 outlines the steps to test SSSVs every six (6) months. Results of SSSV tests are maintained in SoCalGas' maintenance management systems and any unresolved sub- or non-standard conditions are noted, with a requirement to repair or replace a failed or incompletely functioning SSSV within ninety (90) days or else temporarily plug the well. The tracking SoCalGas will do in their maintenance



and records management systems will allow SoCalGas to compare the reliability of the new and recent installations to the reliability of the old systems used in the 1970s and 1980s.”

Data Request #24A

The Ombudsman delivered Data Request #24A to SoCalGas on March 23, 2026, giving three (3) questions to follow up on SoCal’s responses to DR #24.

- Clarification, update, correction, and redaction of applicable parts of Position Paper S_POS.002, per the Ombudsman’s review of DR #24 material provided by SoCalGas.
- Request for SoCalGas to direct questions to Halliburton to edit and clarify their safety valve reliability information provided in response to the original DR #24 question.
- The understanding of the threat level assessment related to the Northridge Blind Thrust Fault.

SoCalGas responded on June 24, 2026. DR #24A questions, SoCalGas responses and pertinent information supplied by SoCalGas can be found at the links below:

- [Click Here](#) (AC SO - DR 24A - SCG Response)
- [Click Here](#) (Question 1 - S-POS.002_Redacted for SO)
- [Click Here](#) (Question 2.a - WellStar TRSV Reliability Chart)
- [Click Here](#) (Question 2.b - NE™ Reliability Chart)

Summary Analysis and Opinion of the Ombudsman Following DR#24A Responses

The Ombudsman reviewed the SoCalGas response to Data Request #24A, including discussion with SoCalGas representatives at the June 25, 2026 WSOC meeting. The SoCalGas responses were sufficient to address the Ombudsman’s questions.

DR 24A Q1 - Clarification, update, correction, and redaction of applicable parts of Position Paper S POS.002, per the Ombudsman’s review of DR #24 material provided by SoCalGas

SoCalGas provided an edited and redacted version of the Position Paper and explained that the risk of installing and servicing subsurface safety valves was considered but not included in the Decision Tree on page 3 to evaluate and prioritize installation, and that SoCalGas manages the associated risk by establishing comprehensive procedures and training affected personnel.

DR 24A Q2 - Request for SoCalGas to direct questions to Halliburton to edit and clarify their safety valve reliability information provided in response to the original DR #24 question.

SoCalGas provided Halliburton’s revised copies of the two reliability charts found in response to DR #24, as well as Halliburton’s comments responsive to safety valve reliability and issues most often affecting safety valve reliability.

The reliability curve and probabilistic projections are based on a 9-year study of installations in Gulf of Mexico wells. Reliability and failure contributors include: unacceptable flapper leak rate during closure; flapper closure malfunction; attempted hard closure during full flow; inadequate testing and maintenance; hydraulic leaks; control line faults; installation error or damage, and well conditions.



WellStar® TRSV systems have been in service since 1996 with no improvements. NE™ TRSV systems have been in service since 2002 as a rod piston, non-elastomeric version of the WellStar®, but since 2011 with improved high-performance piston seals..

DR 24A Q3 - The understanding of the threat level assessment related to the Northridge Blind Thrust Fault.

SoCalGas referred to the work and analyses conducted on behalf of SoCalGas as part of the publicly available Aliso Canyon Geologic, Seismologic and Geomechanical Studies in 2019. SoCalGas stated in their response that the potential threat related to movement on the Northridge Blind Thrust Fault (NBTF) is rated as low, primarily due to its geological positioning and historical performance, and that assessment is independent of the mitigations effects provided by subsurface safety valves. The NBTF is located several kilometers below the field and down-dip of the gas storage reservoir, making it an unviable pathway for gas migration. The magnitude 6.7 1994 Northridge earthquake provided an example in that there was minimal well damage that occurred at surface or in the shallow subsurface as a result of landslides but no damage farther downhole. The NBTF does not intersect any well and the NBTF is unlikely to cause a breach of the storage reservoir's natural seals.

The 1994 Northridge earthquake example shows that the relative risk of a NBTF-event to a well with and without a deep subsurface safety valve is essentially the same as the relative risk of a landslide-induced well-integrity event to a well with and without a subsurface safety valve. Therefore, with regard to positioning of the NBTF relative to the Aliso Canyon Storage Gas Reservoir, the primary risk associated with the NBTF's activity is its ability to trigger secondary hazards like landslides as stated in AECOM "Probabilistic Fault Displacement Hazard Assessment."

Well Integrity Assessments and Workovers

Work year-to-date June 2026 includes eighteen (18) workovers, of which seven (7) were risk assessment shut-in annulus pressure tests, and one (1) was a casing expansion/isolation test, with one (1) risk assessment and three (3) plug and abandonment workovers in progress.

Aliso Canyon wells have been plugged in accordance with CalGEM and PHMSA rules, essentially filling all voids with cement, and reducing the well count to fifty-eight (58) injection/withdrawal (I/W) wells by plugging fifty-six (56) wells since late 2016. Given plugging and abandonment of three wells currently in progress, the active well count at Aliso Canyon will be reduced to fifty-five (55).

As of June 2026, forty-three (43) out of fifty-eight (58) I/W wells have had complete new inner casing strings installed since 2016. The three (3) wells being plugged have inner strings, so after the plugging work is complete, forty (40) of the remaining fifty-five (55) active wells will have new inner casing strings.

Thirteen (13) Aliso Canyon wells have subsurface safety valves installed; ten (10) operational and three (3) out of service for various work. SoCalGas plans up to thirteen (13) additional installations in 2026-2027; refer to the table below.

Aliso Canyon Subsurface Safety Valve Installations			
Well	Safety Valve Depth (ft., measured)	Status	Primary Threat Basis
Fernando Fee 33	367	Operational	Landslide Threat
Fernando Fee 34	489	Operational	Landslide Threat

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Aliso Canyon Subsurface Safety Valve Installations			
Well	Safety Valve Depth (ft., measured)	Status	Primary Threat Basis
Porter 24A	3360	Operational	Fault Movement Threat
Porter 50C	3199	Operational	Fault Movement Threat
Porter 69C	462	Operational	Landslide Threat
Porter 69F	468	Operational	Landslide Threat
Porter 69J	479	Operational	Landslide Threat
Standard Sesnon 9	457	Operational	Landslide Threat
Standard Sesnon 10	372	Operational	Landslide Threat
Standard Sesnon 29	374	Operational	Landslide Threat
Fernando Fee 32F	3530	Installed, out of service	Fault Movement Threat
Fernando Fee 35C	1712	Installed, out of service	Fault Movement Threat
Porter 72B	3237	Installed, out of service	Fault Movement Threat
Fernando Fee 32	+/- 3700	Planned	Fault Movement Threat
Fernando Fee 32A	+/- 3700	Planned	Fault Movement Threat
Fernando Fee 32B	+/- 3700	Planned	Fault Movement Threat
Fernando Fee 32G	+/- 3700	Planned	Fault Movement Threat
Fernando Fee 35A	+/- 3700	Planned	Fault Movement Threat
Porter 32	+/- 3700	Planned	Fault Movement Threat
Porter 32C	+/- 3700	Planned	Fault Movement Threat
Porter 42A	+/- 3700	Planned	Fault Movement Threat
Porter 50B	+/- 3700	Planned	Fault Movement Threat
Porter 68A	+/- 3700	Planned	Fault Movement Threat
Porter 69A	+/- 3700	Planned	Fault Movement Threat
Porter 69D	+/- 3700	Planned	Fault Movement Threat
Porter 72A	+/- 3700	Planned	Fault Movement Threat

The ongoing accumulation of well integrity findings from the surface monitoring and downhole inspections suggest to SoCalGas that the reassessment inspection period can be lengthened. As of June 2026, the Company had been granted eighty-three (83) reassessment extensions on fifty-four (54) unique wells, with the reassessment interval reset by CalGEM from twenty-four (24) months to as much as eight-four (84) months. For six (6) wells where reassessment extension requests had previously been denied, SoCalGas reworked two (2) wells, reinspected three (3) wells, and subsequently received reassessment extension permission from CalGEM.



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

SoCalGas is subject to regulation by the CPUC, CalGEM, and PHMSA. The CPUC has safety jurisdiction over the operation of the surface equipment at the Aliso Canyon Facility. PHMSA at the federal level, and CalGEM at the state level, have safety jurisdiction over underground natural gas storage facilities including the wells and storage reservoir. CalGEM regulations for construction, operation and maintenance, monitoring, and safety requirements for the storage wells and storage reservoirs must meet the federal safety regulations that were implemented by the Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) in the interim rule of December 2016 and final rule of March 2021. Indeed, many CalGEM regulations exceed the federal minimum standards.

CalGEM/PHMSA Audits

PHMSA, while retaining enforcement authority, permits CalGEM to act as PHMSA's agent for safety inspections of the Facility. PHMSA reviews CalGEM audit findings and recommendations prior to issuance of inspection reports to SoCalGas. The most recent CalGEM audit of the Aliso Canyon Facility was in May 2025 and comprehensively addressed 228 questions regarding the storage integrity management program and related construction, maintenance, inspection, testing, and documentation; there were no findings against SoCalGas' storage integrity management program in this audit.

SoCalGas submitted its RMP update to CalGEM on April 1, 2022, as required, and most recently submitted an additional RMP update to CalGEM on June 5, 2026. SoCalGas demonstrated compliance with CalGEM requirements by referring to the various Storage Integrity Management Plan (SIMP) chapters in the Aliso Canyon Risk Management Plan (RMP). SoCalGas maintains a standing monthly meeting with CalGEM and uses the meetings for a detailed look at quantitative risk analysis, communication of details of learnings and developments to CalGEM, and fostering question and answer sessions. Part of the process of continual improvement of the RMP is review of the procedures referred to in the SIMP chapters. Some documents require reviews every year, and others are reviewed every three (3) years.

CPUC Audits

The Safety and Enforcement Division (SED) of CPUC conducted a General Order (GO) 112-F Comprehensive Operation and Maintenance Inspection audit on April 21 through 25, 2025. The audit timeframe covered calendar years 2021 through 2024 and included seventy-seven (77) Records questions, seven (7) Procedure questions, thirty-nine (39) Observation questions, and twenty-seven (27) Integrity Management questions.

The SED found no unsatisfactory results, but identified three (3) areas of concern:

1. Several control panels in the Station's EDC compressor room were observed to display a time that was ahead of the actual time.
 - *SoCalGas response:* Aliso Canyon personnel corrected the time discrepancy. HMI (human-machine interface) panels in the EDC compressor building, UPS (Uninterruptible Power Supply) room, and KVS (vacuum system) unit now synchronize with the corresponding PLCs (Programmable Logic Controller).



2. SED commented that “Gas Velocities” records appeared to be based on assumptions and requested that SoCalGas clarify if it is using the American Petroleum Institute (API) Recommended Practice (RP) 14E erosion rate equation or another variant, and that SoCalGas review National Association of Corrosion Engineers (NACE) Technical Paper C2019-13206.
 - Gas Engineering reviewed the paper and determined it is an opinion paper and therefore does not intend to utilize it when calculating gas velocities in the future.
3. 2022 Aboveground Pipeline inspection records were missing internal checklists required by company procedures. The inspections were completed on time, just missing the checklist. This information was previously self-reported to SED.
 - The gas standard was rewritten with a new aboveground pipeline inspection form created and attached as an appendix in the standard. Storage employees were re-trained to follow the gas standard with emphasis on the completion of the checklist for each individual section of aboveground pipelines.

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 outlining 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 ppm.

During the period of July 2025 – June 2026 there were no known fence-line monitoring methane concentration exceedance events.

The fence-line methane monitoring system is comprised of eight (8) monitoring areas offering 24/7 surveillance and are maintained with monthly checks, quarterly calibrations, and component replacement as necessary. There is also a public-facing website and updates to this webpage are performed at least twice monthly, which continues to make the system more reliable and helps avoid outages.

The Ombudsman previously made inquiry and addressed the reliability of the fence-line methane monitoring system as summarized in Annual Report Number 4 – Work of the Safety Ombudsman, available at this link: [Click Here](#)



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 separate reports, Annual Report Number 7 – Work of the Aliso Canyon Well and Storage Operations Safety Committee, Section III, and Annual Report Number 7 – Recommendations for Improvements Related to Safety and Leak Prevention, Section II, and will not be repeated here.

The Safety Ombudsman maintains a compendium of all recommendation topics by the WSOC and/or the Ombudsman over the past seven (7) years, the period over which the Consent Decree has been active. The summary of past and current recommendations and the progress of SoCalGas in response to the recommendations is contained in a Microsoft Excel file which can be found at the following link: [Click 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 response to the issue.

Comments provided to the Ombudsman at the October 15, 2025, public meeting were addressed previously in this Report.