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PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of

PACIFIC ENERGY & MINING COMPANY.

AFFIDAVIT OF DANA F. GREEN

Docket No.: 18-2602-01

STATE OF CALIFORNIA)
 :ss
COUNTY OF LOS ANGELES)

I, Dana F. Green, make and execute this Affidavit based on my own personal knowledge:

1. I am over the age of 18 years, and am competent to testify in a court of law.
2. I called Mr. Jimmy Betham numerous times since January to discuss his letters concerning "Outstanding Issues" listed in two letters to PEMC. In those letters Mr. Betham stated:

"If you have any questions concerning this inspection or the compliance process you may contact me at 801 580 6286 ..."

I did not receive any calls back from Mr. Betham.

3. During the November 2018 hearing with the Commission, Mr. Betham testified that he did not have any issues with PEMC's manual. His issue was with the supporting documentation of actions taken subject to the manual. In my discussions with Mr. Tariq Ahmad, it was found that the records he was referring to were held and maintained in Reno, Nevada at PEMC's main office. Mr. Ahmad collected the subject records and forwarded them to Mr. Betham. Furthermore, Mr. Betham did not respond.

4. In the Division's response filed with the Commission on April 29, 2019, there were two Memorandums from Mr. Al Zadeh. Neither of these Memorandums or the information in the Memorandums were ever provided to us by the Division.

5. The Memorandum is incorrect and contrary to the testimony of Jimmy Betham wherein he testified that the manual submitted by Pacific was complete.

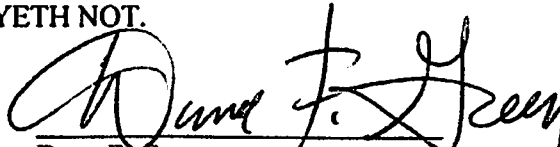
6. In Mr. Betham's letters dated January 2, 2019 and March 22, 2019, Mr. Betham stated there were five remaining items, two of which were unresolved from the 2016 audit. This letter confirmed the testimony of Jimmy Betham wherein he stated there were no issues with the manual.

7. A plain English reading of Mr. Betham's January 2, 2019 letter clearly states all issues from 2016 were resolved except for two carryover items.

8. In the Division's response, Mr. Zadeh said there were eleven outstanding items of Possible Non-compliance issues from 2016. The eleven items are contrary to the letters sent by the Division listing two carryover items from 2016.

9. Pacific Energy's response to the January and March letters addressed the two carryover items as the Division confirmed only two items from 2016.

THE AFFIDANT FURTHER SAYETH NOT.


Dana F. Green
C.D.L. # ... 3327

On the 6th day of May 2019, personally appeared before me, the undersigned notary, Dana F. Green, the signer of the foregoing Affidavit who duly acknowledged to me that he signed the same voluntarily and for its stated purpose.


NOTARY PUBLIC

