

TARIQ AHMAD
PRESIDENT
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**IN THE MATTER OF PACIFIC ENERGY &
MINING COMPANY**

Docket No. 18-2602-01

**NOTICE OF DEPOSITION
JIMMY BETHAM**

Respondent Pacific Energy & Mining Co. (“PEMC”) , requests that the Division of Public Utilities (“PUC) set forth answers to the following interrogatories, requests for admissions, and requests for production of documents, and serve a sworn copy upon the undersigned within twenty-eight days of service hereof:

DEFINATIONS

The term Pipeline refers to the 16 inch gathering line operated by PEMC in Grand County, Utah.

INTERROGATORIES

1. Provide the names and addresses of each person in the Division that contacted PEMC during the period 2010 through 2018:

Provide in detail the time of the contact;

Subject matter of the contact

If any notes were taken during these contacts

Name of the person who was contacted at PEMC.

Whether the contact was by electronic mail, telephone or letter.

2. Please state the name, address, and telephone number of any employee or representative of Division of Public Safety Utilities who was on site during at the Greentown Gas Gathering System during the period December 1, 2013 through June 1, 2017.

3. Provide the list of all phone calls and communications employees of the PUC had with the Federal Government Department of Commerce in reference to PEMC. For each of the communications please provide:

a. Nature of the communication

b. Item discussed

c. If any notes were taken.

4. Provide in detail the reason PUC did not inspect the 16 inch pipeline from the period 2008 until 2014.

5. Provide in detail the following information for each of the PUC employees who have reviewed and or inspected the Pipeline:

a. Name of each individual

b. Education of each individual, including from High School thru Graduate School.

c. Name of each school or University attended and its location.

d. License of specialization of each individual

e. Training for each individual in determining jurisdiction and regulation.

f. List of all employees of each individual prior to joining the PUC.

g. Medical history as it relates to mental health.

h. Job description and duties of each individual.

6. Do the PUC employees assist in resolving issues regarding to Pipeline Safety.
7. Provide names of each and every operator of natural gas pipelines that the PUC has issues Notices of Violation from the period 2008 through 2018.
8. Did PUC request or obtain consent from owners of the Pipeline to determine if PEMC had authority to subject the Pipeline to PUC jurisdiction.
9. It is the position of the PUC that subject matter jurisdiction is voluntary.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents relating to any of the responses to the interrogatories above.
2. Produce all documents showing that PEMC voluntarily submitted to subject matter jurisdiction of PUC.
3. Produce all documents that show that PUC employees assisted in the preparation of the manual that PUC wants PEMC to prepare.
3. Produce copies of Pipeline safety manual that is in the possession of the PUC relating to a regulated pipeline in the State of Utah. PUC may redact the name of the pipeline and the operator.
4. All documents related to PUC decision to regulate the Pipeline.

REQUEST FOR ADMISSIONS

1. Admit that PUC did not regulate the Pipeline from 2008 through 2013.
2. Admit that PUC did not contact the operator of the Pipeline during the period 2008 through 2013.
3. Admit that PUC does not have subject matter jurisdiction over the Pipeline.
4. Admit that natural gas was compressed, dehydrated and liquids removed at the Well site

from the years 2008 through 2013.

5. Admit that PUC does not regulate natural gas gathering lines.
6. Admit that it is practice in the oil and gas industry to compress and remove liquids at the Well site at high pressure wells.
7. Admit that PUC employees do not have experience in operation or inspections of Natural gas wells.
8. Admit that PUC employees have not visited wells located in the Greentown Oil Field in Grand County Utah.
9. Admit that PUC has stated that “if gas is compressed, dehydrated and liquids removed” than the pipeline at the point this occurs is regulated.
10. Admit that there are hundreds of wells where gas is compressed, dehydrated and liquids removed at the well site.

DATED : August 10, 2018



Tariq Ahmad
President
Pacific Energy & Mining C.

PROOF OF SERVICE

I certify that I caused a true and correct copy of the foregoing to be served this 8th day of August 2018 by email to the following:

Chris Parker, Director Division of Public Utilities
chrisparker@utah.gov

Al Zadeh, Pipeline Safety Lead
azadeh@utah.gov

DPU Data Request
DPUdatarequest@utah.gov

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Dated: August 10th, 2018



Tariq Ahmad