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NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

INTERVIEW OF JOSE ORNELAS, DARCY & HARTY
CONSTRUCTION
(JAN-6-2011)

(100 Pages)

UNITED STATES OF AMERICA

NATIONAL TRANSPORTATION SAFETY BOARD

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Investigation of:

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PACIFIC GAS & ELECTRIC COMPANY

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SEPTEMBER 9, 2010 ACCIDENT

* Docket No.: DCA-10-MP-008

SAN BRUNO, CALIFORNIA

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Interview of: JOSE ORNELAS

Marriott Hotel
San Francisco Airport
1800 Bayshore Highway
Burlingame, California 94010

Thursday,
January 6, 2011

The above-captioned matter convened, pursuant to
notice.

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Investigator-in-Charge

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I N D E X

<u>ITEM</u>	<u>PAGE</u>
Interview of Jose Ornelas:	
By Mr. Gunther	9
By Mr. Fassett	13
By Mr. Shori	26
By Mr. Katchmar	50
By Mr. Daubin	66
By Mr. Fassett	70
By Mr. Katchmar	71
By Mr. Gunther	77
By Mr. Nicholson	78
By Ms. Mazzanti	79
By Mr. Chhatre	80
By Mr. Caldwell	82
By Mr. Daubin	83
By Mr. Fassett	92
By Ms. Fabry	94
By Mr. Shori	94
By Mr. Chhatre	96
By Mr. Daubin	96
By Mr. Fassett	98
By Ms. Fabry	98

1 I N T E R V I E W

2 MR. CHHATRE: Good morning, everyone. Today is
3 Thursday, January 6, 2011. We are currently in Burlingame,
4 California, at the San Francisco Airport Marriott. We are meeting
5 in regards to the investigation of pipeline rupture in San Bruno,
6 California, that occurred on September 9, 2010. The NTSB accident
7 number for this investigation is DCA-10-MP-008.

8 My name is Ravi Chhatre. I'm with the National
9 Transportation Safety Board in Washington, D.C., and I'm the
10 investigator-in-charge of this accident.

11 I would like to start by notifying everyone present in
12 this room that we are recording this interview for transcription
13 at a later date. All party members will have a chance to review
14 the transcripts when they are completed.

15 Also, I'd like to inform Mr. Jose Ornelas --

16 MR. ORNELAS: Yes.

17 MR. CHHATRE: -- that you are permitted to have one
18 other person present with you during this interview. This person
19 is of your choice. It can be a supervisor. It can be a friend.
20 It can be a family member. Or if you choose, no one at all.

21 So for the record, please state your full name, spelling
22 of your name, your contact information, telephone, e-mail and
23 postal mailing address and who you have chosen for today's
24 interview.

25 MR. ORNELAS: Okay. My name is Jose Ornelas. My phone

1 number is (415) . Mr. Goodman is the guy with me.

2 MR. CHHATRE: Thank you for that.

3 UNIDENTIFIED SPEAKER: Can we get the spelling of your
4 name?

5 MR. ORNELAS: Jose Ornelas, O R N E L A S.

6 UNIDENTIFIED SPEAKER: Thank you.

7 MR. ORNELAS: Sure.

8 MR. CHHATRE: I'd like to go around the room and have
9 each person to introduce themselves. State your name, spelling of
10 your name, title, organization, address, e-mail, phone number,
11 starting with the City.

12 MR. CALDWELL: My name is Geoff Caldwell, with the City
13 of San Bruno, and my information's contained on the card provided.

14 MR. DAUBIN: Brian Daubin with PG&E, information is on
15 the card provided.

16 MR. FASSETT: Bob Fassett, PG&E, information is on the
17 card provided.

18 MS. JACKSON: Connie Jackson, City of San Bruno. My
19 information's on my card.

20 MS. FABRY: Klara Fabry, City of San Bruno. My
21 information on the card provided.

22 MR. SHORI: Sunil Shori, California Public Utilities
23 Commission. My information is on the card provided.

24 MR. KATCHMAR: Peter Katchmar, United States Department
25 of Transportation, Pipeline and Hazardous Materials Safety

1 Administration, PHMSA. My information is on the card provided.

2 MR. GUNTHER: Karl Gunther, NTSB. I'm the Operations
3 Group Chairman. Email is karl.gunther@ntsb.gov, phone (202) 314-
4 6478.

5 MS. MAZZANTI: Debbie Mazzanti, International
6 Brotherhood of Electrical Workers, Local 1245, and my information
7 is on my card.

8 MR. SPERRY: Joshua Sperry, with Engineers and
9 Scientists of California, Local 20, IFPTE. My information's been
10 provided.

11 MR. NICHOLSON: Matthew Nicholson, NTSB, engineer,
12 matthew.nicholson@ntsb.gov. That's spelled M A T T H E W
13 N I C H O L S O N.

14 MR. CHHATRE: Ravindra Chhatre, NTSB, Washington, D.C.
15 My e-mail is ravindra.chhatre@ntsb.gov, telephone number (202)
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17 MR. NARVELL: Rick Narvell, Human Performance
18 Investigator Group Chair, NTSB, Washington, D.C., phone (202) 314-
19 6422, e-mail is narvelr@ntsb.gov.

20 MR. GOODMAN: And my name is Joshua Goodman,
21 J O S H U A, last name, G O O D M A N, counsel for D'Arcy and
22 Harty, and my e-mail is jgoodman@jgn.com, phone number (415) 705-
23 0403.

24 MR. CHHATRE: Okay. Karl, do you want to go first or
25 should we start --

1 MR. GUNTHER: No, I'd like to go first.

2 MR. CHHATRE: Go ahead.

3 INTERVIEW OF JOSE ORNELAS

4 BY MR. GUNTHER:

5 Q. Can I get your job title and affiliation?

6 MR. CHHATRE: Identify yourself.

7 MR. GUNTHER: Karl Gunther, NTSB.

8 BY MR. GUNTHER:

9 Q. Can I get your job title and affiliation?

10 A. Foreman.

11 Q. Okay. All right. Anyway, what are your formal or what
12 kind of education do you have?

13 A. I work as certified, so -- well, about the job, I got
14 certified for a pipe person.

15 Q. About how many years of experience do you have?

16 A. About 20 years.

17 Q. Okay. And who do you work for?

18 A. D'Arcy and Harty Construction.

19 Q. Okay. Take back on the intersection of Earl Avenue and
20 Glenvue, could you describe what you did on the days that or the
21 day or days that you made the crossing of the PG&E pipeline? Just
22 go ahead and start from the beginning and --

23 A. Yeah, well, we start on Friday, what day was that? We
24 started on Friday. There was a PG&E guy, Mr. Steven come out and
25 say when you guys going to cross the gas line, and we tell him

1 we're going to start back on Monday. So basically I don't
2 remember if we dug a manhole (indiscernible) ground on Friday. So
3 I don't really remember that day when we do that. So what I know,
4 we did (indiscernible) gas main on Monday when Mr. Steven was
5 there all day pretty much. So we (indiscernible) all around and
6 then we start bursting old pipe, and I don't know, don't remember
7 because I've got too many things going on some time. So what I
8 know, I told him we start bursting the pipe. We start bursting,
9 and we got a space between, a bit little space. So we've got to
10 keep the pipe clean all around, all the gas main all around, make
11 sure we don't hit it when we come over the pipe. We got guys
12 there, you know, of course, to shore. I got a guy down there, got
13 a backhoe, the bucket, just put it on there and the guys shoveling
14 and the guys take them out because from there, from the gas main,
15 I got like 8 feet to one side and then I have about 3 feet on the
16 other side toward the manholes, to the manhole side. So I have
17 enough room to get the bucket down there without making any damage
18 into the pipe. So the guy just shoveled into the bucket, and we
19 pull more, you know, we pull 20 feet and then take the
20 (indiscernible) out. So when our pipe come close to the bank, to
21 the (indiscernible), the hammer stop completely because we don't
22 need the hammer any more. We have the 10 ton winch that pull the
23 pipe. So after we get there, the hammer was completely off.
24 Because we don't need the hammer. So we're coming underneath the
25 pipe, going to the manhole and there was no vibration.

1 Q. Did you shore the ditches that you made?

2 A. We did it.

3 Q. Okay. How far under the PG&E pipe or how far did you
4 dig, how deep?

5 A. Once I was about 7, 8 feet and the other side was 7 feet
6 but we go underneath a couple of feet.

7 Q. Okay. So you were about 2 feet under the PG&E pipe?

8 A. So about 2 feet underneath, 3 the one, 3, 4 feet on the
9 one side and about 6, 7 feet on the other side.

10 Q. Okay. When you did your pipe bursting, did you leave
11 any shards or anything underneath the pipe?

12 A. No.

13 Q. So that was all clean?

14 A. Right.

15 Q. And did you measure the distance between your pipe and
16 the PG&E pipe?

17 A. That was less than a foot. That's what Mr. Steven say,
18 it's not allowed to get the pipe so close. So he make a phone
19 call and come back, I don't know, 10, 15 minutes after, and he say
20 probably got to put something between them so sewer underground
21 don't touch it. So then I don't really remember if he make
22 another phone call but he say just put something between. So I
23 don't remember what we put but I think it was like wood between
24 the gas pipe and the sewer, and so that's there.

25 Q. Did you put something -- let me ask. You put something

1 between your pipe and their pipe?

2 A. Right.

3 Q. And what did you put there?

4 A. I think it was wood. I don't really remember but I
5 think (indiscernible).

6 Q. Okay. And was the guy from PG&E there when you did
7 this?

8 A. Yes.

9 Q. And he approved of it.

10 A. Yes.

11 Q. Or --

12 A. Yes.

13 Q. Okay. Was the guy from PG&E there when you dug the
14 ditch around the pipe?

15 A. Right, he was there.

16 Q. Okay. And he was also there when you did the pipe
17 bursting?

18 A. Right. I don't know if they were there for the pipe but
19 I know I call him to come back before we backfilled. So that's
20 when he make the phone call because the pipe so close. So then he
21 say, go ahead, he approve it, you know, when I called, say come
22 up, take a look, this is your pipe, this is between your, it don't
23 remember how much it was, but he say go ahead, backfill.

24 Q. Okay. And so you don't remember whether he was there
25 when you did the bursting?

1 A. No, we got some (indiscernible) to pull pipe in that
2 time. So it was kind of late because we worked after 8:00 that
3 day. I think he left. I don't know. I don't remember.

4 Q. What did you backfill the pipe with? What kind of
5 material?

6 A. Mr. Steven tell me the backfill, we backfill with a
7 class 2 base rock.

8 Q. Okay. Did he observe you backfilling?

9 A. Yes, he told me, he told me what we use. So --

10 Q. All right. Did you see any damage at all to the PG&E
11 pipe?

12 A. No.

13 Q. And did the PG&E representative say anything about
14 damage to his pipe?

15 A. No.

16 Q. All right.

17 MR. GUNTHER: I'll go ahead and --

18 MR. CALDWELL: Geoff Caldwell, City of San Bruno, no
19 questions at this time.

20 MR. DAUBIN: Brian Daubin, PG&E, no questions at this
21 time.

22 MR. FASSETT: Bob Fassett, PG&E, I have a few questions.

23 BY MR. FASSETT:

24 Q. Karl's point or question, I'm not sure I understood.
25 Did the PG&E employee tell you what backfill to use and watch you

1 as you backfilled it?

2 A. Yes, he did.

3 Q. He observed you backfilling or did he tell you what
4 material to use?

5 A. Right. Right.

6 Q. So he only told you what backfill material to use.

7 A. Right, but I'm not sure he was there for the backfill
8 but he told me -- it's hard to remember that time what was he. He
9 tell me backfill with, we backfill with, but if he don't tell me
10 backfill, we backfill with class 2 base rock.

11 Q. Okay. What's the size of the compressor that you use?

12 A. 375 Leroy.

13 Q. Leroy.

14 A. Yeah, correct.

15 Q. What's the length of the pull?

16 A. 300 feet.

17 Q. How long was the bursting head on from the time you
18 started the pull approximately, from the time you started the pull
19 until the time you turned the bursting head off?

20 MR. GOODMAN: You mean the time or distance?

21 BY MR. FASSETT:

22 Q. Time approximately?

23 A. About 6 hours.

24 Q. It was explained earlier that the winch, this 10-ton
25 winch that you referred to, was placed in essentially the manhole

1 to the east of the transmission main. Is that correct?

2 A. Right.

3 Q. What was the distance between the west edge of the
4 shoring of that hole and the transmission main?

5 A. Around 8 feet.

6 Q. About 8 feet.

7 MR. CHHATRE: Let's go off the record for a second.

8 (Off the record.)

9 (On the record.)

10 MR. CHHATRE: Back on the record.

11 MR. GOODMAN: So this is Josh Goodman. We were asked at
12 Monday's interview with John Harty to produce some documents which
13 we have now produced, and I will go through them. The first two
14 pages, there was a question about the model of the pipe bursting
15 equipment, and Mr. Harty had said it was -- the manufacturer was
16 Hercules. Actually these two documents show that the manufacturer
17 was Grundacrack (ph.) and the model was Hercules which is on the
18 second page. There was also a question of Mr. Ornelas' training
19 in pipe bursting and he was certified. So the next page is the
20 certification letter from TT Technologies dated February 29, 2008.
21 The next page is just a copy of the business card of the PG&E gas
22 mechanic, transmission and regulation inspector, Steven Poulou,
23 P O U L O. The next group of pages are phone records showing
24 phone calls. There's one record that shows the call to USA which
25 is marked on the second page and on the first page is a call to

1 Mr. --

2 MR. CHHATRE: Which is the USA call?

3 MR. GOODMAN: It actually says USA in the right-hand
4 margin on the second page, and I believe it is the 800 number
5 there. It says toll free 800. I believe that is May 30th at 7:02
6 a.m. And the first page is a call to Mr. Poulo and the number
7 matches the number on his business card. And then the other pages
8 show some other calls to PG&E and the dates.

9 The next page is a copy of the daily job log showing the
10 call to USA and the USA number. We were asked for the USA ticket
11 but this is what we have. And then the next pages are
12 Mr. Ornelas' job logs showing the work specifically at this
13 interview, at this intersection, Glenvue and then there were
14 questions about closeout documents and punch lists and so the last
15 three pages are just an e-mail from Wing Wong showing notice of
16 completion and some items that they were asked to come back and
17 deal with.

18 MR. FASSETT: Are we on the record?

19 MR. CHHATRE: Yes.

20 MR. FASSETT: Okay. Where was I?

21 BY MR. FASSETT:

22 Q. So the winch was up against, I asked earlier. The winch
23 was up against the west wall of I guess it was the hole for the
24 manhole. Is that correct?

25 A. Right, the winch point west.

1 Q. It was pointing west.

2 A. Right.

3 Q. So when it pulled, when the winch --

4 A. That one can spin. The bottom part can spin around --

5 Q. Okay.

6 A. -- to 100 degree and you can have the (indiscernible)
7 winch is like the bottom part, it can spin and you can make it
8 point that way.

9 Q. Right. No, I'm familiar with how it works.

10 A. Okay.

11 Q. So the winch was secured to the west wall of that
12 manhole. Is that correct?

13 A. Right.

14 Q. And that was on the east side of the transmission main?

15 A. Right.

16 Q. Okay. Was there any -- did you have to manage water in
17 that bell hole? Were you pumping water out at all?

18 A. No, we got a bypass from upstream (indiscernible).

19 Q. But there was no ground water?

20 A. No.

21 Q. There's a reference in your notes there that you used a
22 3 inch pump?

23 A. Well, it says there is (indiscernible) houses between
24 there. So -- well, that is ground water coming from the houses.

25 Q. So there is water that you had to manage with a pump?

1 A. Right.

2 Q. You had to pump water out of the hole. That's what I'm
3 asking. Is that correct?

4 A. Yeah.

5 Q. Okay. In your notes, it says that was a 3 inch pump or
6 a 4 inch pump?

7 A. 4 inch pump.

8 Q. 4 inch pump. And where was that pump placed?

9 A. It was second manhole upstream, pump it to the third
10 manhole downstream. It was upstream --

11 Q. He has kind of a drawing up there. Could you sketch on
12 there where your pumps were?

13 MR. CHHATRE: If he draw, that's fine, too. This
14 drawing for you --

15 MR. ORNELAS: Well, he wants to know what the manhole we
16 pump --

17 MR. CHHATRE: Right.

18 MR. ORNELAS: So I can turn this page. So this manhole
19 here, we have a manhole up there, and then we have another manhole
20 back here. So we set the pump right here upstream for the bypass
21 and run the hose way around there to the other manhole. So
22 there's no flow coming to the manhole where we pull. So whatever
23 the water we have there, some come out from the houses.

24 MS. FABRY: Klara Fabry. Would you please just for
25 clarity show where Glenvue intersect Earl?

1 MR. ORNELAS: This is here.

2 MS. JACKSON: Can you draw Glenvue on there?

3 MS. FABRY: Put Glenvue at the bottom, just for clarity
4 for everybody.

5 MR. ORNELAS: Yeah, it's here.

6 MS. JACKSON: Thank you.

7 MR. ORNELAS: So this is where I make the bypass, from
8 this manhole up to the next one, it was right by the park, at
9 Glenvue, it was right in the park. The park is right here.

10 BY MR. FASSETT:

11 Q. Okay. Thank you. So in that hole, where you had the
12 winch --

13 A. Uh-huh.

14 Q. -- did you have to manage water out of that hole? Was
15 that a wet hole?

16 A. It was, yeah, like I say, coming from the houses. I
17 don't know if it was ground water.

18 MR. CHHATRE: Ravi Chhatre, NTSB. What is that box you
19 drew in?

20 MR. ORNELAS: This one here?

21 MR. CHHATRE: Yes, sir.

22 MR. ORNELAS: We put up a manhole. We replaced --

23 MR. CHHATRE: Okay.

24 MR. ORNELAS: -- and so that's where (indiscernible).

25 BY MR. FASSETT:

1 Q. So again just -- you jumped in there. So you had a 4
2 inch pump in that manhole where the winch is?

3 A. Up here.

4 Q. Was there a pump in the manhole where the winch was?

5 A. Maybe a 2 inch pump, but it's not all the time that the
6 water collect there. Just keep it dry. That's all but the big
7 pump, it was in this manhole and go all the way to the third
8 manhole.

9 Q. Okay. What kind of shoring did you have in that hole,
10 in that manhole where the winch was?

11 A. Aluminum shoring.

12 Q. Could you draw a picture showing how that hole was
13 shored at least on the west wall of that hole?

14 A. It's like (indiscernible) right here and you have your
15 hole here and this side the --

16 Q. No, I need -- I'm sorry. I need to -- I'm not getting
17 my message across.

18 MR. FASSETT: Do you mind if I draw it and then ask him
19 to --

20 MR. CHHATRE: No problem.

21 MR. FASSETT: -- to clarify.

22 MR. CHHATRE: That's fine.

23 MR. FASSETT: I'll do another page so it doesn't --

24 MR. CHHATRE: That's fine.

25 MR. FASSETT: -- confuse things. It's not to scale.

1 Here's the edge -- here's what I'm calling the west edge, the west
2 edge of the shoring.

3 MR. CHHATRE: Ravi Chhatre. I'm confused. What is
4 that?

5 MR. FASSETT: That's the winch. He said the winch was
6 east of the transmission main.

7 MR. CHHATRE: Which is Earl? Which is Glenvue? Which
8 is pipe?

9 MR. FASSETT: This is Glenvue. This is the transmission
10 pipe.

11 MR. CHHATRE: Okay.

12 MR. FASSETT: Earl is over here. Will you show that?
13 I'm doing a profile.

14 MR. CHHATRE: Okay.

15 MR. FASSETT: I can show Earl this way if you want.

16 UNIDENTIFIED SPEAKER: I think you might have confused
17 everyone when you drew north on the profile.

18 MR. FASSETT: Well, I have to show that because I'm
19 asking about the west wall.

20 UNIDENTIFIED SPEAKER: We're looking north.

21 MR. FASSETT: You're looking north. This is a cross
22 section. So this is a cross section of the pipe, that's the 30
23 inch pipe.

24 MR. GOODMAN: And you're not asking (indiscernible),
25 you're asking what's going on with the shoring wall.

1 MR. FASSETT: Correct.

2 MR. GOODMAN: Okay. Do you understand that?

3 MR. ORNELAS: Yes.

4 BY MR. FASSETT:

5 Q. So your cable is then coming down here and it's coming
6 into the winch, right? Let me finish asking because I want to be
7 clear. So when I say the west wall, I asked you the distance from
8 the west wall to the edge of the pipe. I think you said 8 feet.
9 Is that correct? Approximately. You have the pipe exposed.

10 A. Yeah, 8 feet, right.

11 Q. So from the edge of the pipe to the west shoring is 8
12 feet.

13 A. No, no.

14 Q. What is this distance from the edge of the pipe to that
15 shoring?

16 A. That's 6, 7 feet to here, not to that part. To here.

17 Q. So here's what. I'm going to ask the question again.

18 A. Okay.

19 Q. I want to know the distance --

20 A. Okay.

21 Q. -- from the west edge, your shoring on the west edge,
22 what is the distance from that edge to the pipe. That's what I've
23 asked.

24 A. Okay. All right. This is where the winch was.

25 (indiscernible) between here, that was about 3 or 4 feet. That's

1 what I got here.

2 Q. Between the west edge --

3 A. No, between the pipe and the side of the trench.

4 Q. I'm not asking that. I am asking for the distance from
5 the west edge of the shoring of the winch, where the winch -- the
6 hole that the winch was in.

7 A. Okay.

8 Q. What is the distance from that edge to this east edge of
9 the transmission pipe shown in this drawing?

10 A. About 10, 12 feet.

11 Q. So it's 10 or 12 feet, not 8 feet?

12 A. No, no.

13 MR. FASSETT: We're going to ask for an as-built to
14 verify this because I've heard -- over the course of three days,
15 I've heard four different dimensions as to what this is. So I'd
16 like an as-built to show where's the manhole. We were told it was
17 an 8 x 8 excavation. It's critical to know where the west edge of
18 this is.

19 MR. CHHATRE: For the record, can the City provide that
20 drawing?

21 MS. FABRY: I will look for it in the plans.

22 MR. CHHATRE: Okay. Good enough. Bob, he already told
23 you 10 to 12 feet (indiscernible) believe that. You have a
24 question (indiscernible) in the record. Don't ask people to
25 confuse the --

1 MR. FASSETT: But what I said on the record is I've
2 heard four different dimensions. Is it 10 to 12 or is it 6 to 8?

3 MR. CHHATRE: The witness told you it is 10 to 12 feet.
4 Use that number. You're not putting down -- the question on the
5 drawing is not good. We're on the record. We are in the process
6 of getting the facts, but saying it --

7 MR. FASSETT: I'm just making the note to remember what
8 it is we're trying to verify.

9 MR. CHHATRE: You're drawing it by hand. See, we going
10 to use this (indiscernible) to draw the --

11 MR. FASSETT: Yeah, they're just your note. You're not
12 going to take a picture of --

13 MS. FABRY: I just want to clarify.

14 MR. CHHATRE: Okay.

15 MS. FABRY: You have to realize that, yes, they gave
16 three different dimensions but they are talking from memory of --

17 MR. FASSETT: That's why I asked for --

18 MS. FABRY: -- more than --

19 MR. FASSETT: You know what? I realize that. That's
20 why I asked for the as-built drawings.

21 MS. FABRY: I want the witness to feel comfortable --

22 MR. CHHATRE: Exactly.

23 MS. FABRY: -- that it's very normal that after 2 years
24 you don't remember all of the dimensions.

25 MR. FASSETT: Right. I realize that. That's why I've

1 asked for a drawing and not have to rely on his memory.

2 MS. FABRY: Okay.

3 MR. FASSETT: That's also why I want to show that it's
4 in question.

5 MR. DAUBIN: Brian Daubin with PG&E. Ravi, if this was
6 Mr. Ornelas' initials on that page, I would agree with you that we
7 should remove that, but this is Bob's reference, this is his
8 drawing, and he's associating those notes. I believe that if he
9 has 6 to 8 feet with a question mark, he should be allowed to do
10 that if he's signing that drawing.

11 MR. CHHATRE: Okay. Put a question mark then, please.

12 MR. FASSETT: Well, that's what or is. It's 6 to 8
13 feet.

14 MR. CHHATRE: Okay.

15 MR. FASSETT: That's what that means. I'll put a
16 question mark there.

17 MR. CHHATRE: Okay. Very good.

18 MR. FASSETT: I'm not done. I'm just sitting down. You
19 can sit down.

20 BY MR. FASSETT:

21 Q. So you used aluminum shoring. Again to clarify relative
22 to that picture, so that winch is somehow secured or shoved up
23 against the west wall of that ditch. Is that correct?

24 A. Right.

25 Q. And again just to clarify, the time the bursting tool

1 was on I believe you said 6 hours. I just want to make sure my
2 notes are correct.

3 A. Yes.

4 Q. Okay. That's it for now. Thank you.

5 A. Correct.

6 MS. JACKSON: No questions.

7 MS. FABRY: Klara Fabry, no questions at this time.

8 MR. SHORI: Sunil Shori, California PUC.

9 BY MR. SHORI:

10 Q. Can we go back to like what's the very first time,
11 what's the very first date that you showed up on the site, on the
12 job site?

13 MR. GOODMAN: And can I ask for a clarification. Are
14 you talking about the 300 feet that was in the change order or the
15 entire project?

16 MR. SHORI: I just want to concentrate on Earl and
17 Glenvue.

18 MR. GOODMAN: Okay. So just that 300 foot pull.

19 MR. SHORI: Yes. So basically the very first day that
20 he showed up to do this particular pull.

21 MR. ORNELAS: It was a Friday. Friday, that's when we
22 started on that section, this 300 feet, between Glenvue on 300
23 feet upstream.

24 MR. SHORI: What date would that be? Will that be --

25 MS. JACKSON: That was June 6th.

1 MS. FABRY: That's right.

2 BY MR. SHORI:

3 Q. So when you showed up on that site on June 6th, did you
4 do any excavation that day?

5 A. We do on Friday.

6 Q. Was there -- were all the facilities marked, the
7 subsurface facilities, water lines --

8 A. Yes, they were.

9 Q. -- PG&E lines, gas line, anything else?

10 A. Yes, they were.

11 Q. How many marks did you see on Glenvue as far as gas
12 lines?

13 A. I think I saw just the gas line and water main.
14 Everything is above ground, like wires and stuff, the pole.

15 Q. So did you see one mark, two marks, three marks?

16 A. Say two marks.

17 Q. For?

18 A. One for the gas line and other one for the water main.

19 Q. Did you ever take pictures of the site before you start
20 working?

21 A. Sometimes we take but I don't remember if we take at
22 that time right there.

23 Q. By that point, you're the foreman on the job. Had you
24 or Mr. D'Arcy --

25 A. D'Arcy and Harty.

1 MR. GOODMAN: Mr. Harty.

2 BY MR. SHORI:

3 Q. Mr. Harty, I'm sorry. Mr. Harty, had you met with any
4 PG&E people, had you talked to anybody from PG&E by the time you
5 showed up at this job site?

6 A. Yes, with Mr. Steven on Friday.

7 Q. And when you say Mr. Steven, is it Steven Poulo?

8 A. The inspector, yeah, PG&E inspector.

9 Q. The card you have?

10 A. Right.

11 Q. And where did you speak with Mr. Poulo on Friday?

12 A. Right in the intersection, Glenvue and Earl.

13 Q. And what time of the day was it? Do you recall when you
14 met with him?

15 A. No, I don't recall. He show to the job.

16 Q. And do you recall if it was morning, afternoon, evening?

17 A. I don't recall. The guy was around the time when, that
18 time he asked what we were going to pothole the gas main.

19 Q. No, no, but when you met with him --

20 A. That was Friday. That was the first day.

21 Q. I know, but on Friday, when you met with him at Glenvue
22 and Earl --

23 A. Right.

24 Q. -- was it morning, afternoon, evening?

25 A. I don't remember.

1 Q. So had you called him to meet you there or had he called
2 you to meet him there? How did you end up meeting him there?

3 A. He show up to the job site. I don't call him, no. I
4 don't call him. He show up to the job site.

5 Q. So you were already there and he showed up.

6 A. Right.

7 Q. What kind of a vehicle was he was driving? Did he have
8 a uniform on? What was he wearing?

9 A. I think it was a small pickup. I don't know, Ford,
10 Chevy, I don't know.

11 Q. Did you have a discussion with Mr. Poulo when he
12 arrived?

13 A. No, just he asked me when we going to pothole the gas
14 main. That's all. I tell him what day and then he show up the
15 next day. I mean that was a Monday, and he show early. He was
16 there all the time while we were potholing the gas main.

17 Q. Okay. So that would have been -- so he asked you when
18 are you going to start potholing?

19 A. Right.

20 Q. And what did you tell him?

21 A. I told him it was going to happen next Monday. So that
22 was on Friday. So I tell him next Monday we're going to pothole
23 the gas main.

24 Q. So what were you doing there on that Friday if you
25 weren't going to be digging anything?

1 A. I was (indiscernible) we put some pipe together. Some
2 of the guys work in the manhole and probably we dig up the
3 insertion pin where the pipe going to, maybe the manhole. I don't
4 really remember but I know we do some excavation but it was away,
5 like 300 feet away from the gas main.

6 Q. Okay. So you were doing some excavation --

7 A. Right.

8 Q. -- but not near the gas main.

9 A. Not near the gas, no, 300 feet away from there.

10 Q. Did you have any other facilities where you were doing
11 the excavating that you --

12 A. No.

13 Q. -- that had been marked out.

14 A. No.

15 Q. It was clear.

16 A. It was clear.

17 Q. Okay. So you're basically putting the -- that would be
18 the entry pin?

19 A. Right.

20 Q. For the line?

21 A. Right.

22 Q. What size excavation did you make for that entry pin?

23 A. I believe it was 22 feet long by 2 feet wide, 6, 7 feet
24 deep. I don't remember the depth, but about.

25 Q. 6, 7 feet deep?

1 A. Right.

2 Q. With that depth, could you see the sewer line?

3 A. Right.

4 Q. So did you finish that excavation that day and when you
5 left -- did you leave the site? Were you there in the evening
6 when --

7 A. No, we don't complete excavation because we don't break
8 the pipe. We break after we ready to burst the other one. So we
9 went right to the top and shore --

10 Q. Let me step back.

11 A. I'm sorry.

12 Q. You had made the excavation.

13 A. Right.

14 Q. Okay. You said you go ahead and also start fusing the
15 pipe on the site?

16 A. No, what I say on that Friday, a few guys fuse some
17 pipe. That's something different while we do back there, you
18 know.

19 Q. Uh-huh.

20 A. Because back there, some (indiscernible) another guy and
21 the other guy's fusing sometime, you know, but those two guys
22 fusing pipe all day long. We put together three or four different
23 lengths pipe.

24 Q. To make one long piece.

25 A. Well, I just for the different section, like that was

1 the 300. The next one was 200. The next one 250 or, you know, 4
2 different lengths pipe. I just give the number. This number 1,
3 number 2, so the guys fused all day long.

4 Q. Okay.

5 A. And other guys sometime work in the manholes, sometimes
6 we do small excavation, just make the day and pretty much it.

7 Q. And again, I just want to make sure I understand, that
8 it's clear. The 22 foot long, 2 foot wide pit --

9 A. Uh-huh.

10 Q. -- had been made --

11 A. Yes.

12 Q. -- at that time on that Friday?

13 A. Right.

14 Q. Okay. So when you left that evening, did you leave with
15 the crew together? Did you leave before the crew?

16 A. No, we leave all together.

17 Q. You all left together.

18 A. All together.

19 Q. When you left, how did you -- what did you do with the
20 opening?

21 A. We plate it.

22 Q. Plate covered.

23 A. With steel plates.

24 Q. Okay. So no more work done after that --

25 A. No.

1 Q. -- Friday?

2 A. No.

3 Q. Nothing on Saturday, nothing on Sunday?

4 A. No.

5 Q. So what time did you return on Monday?

6 A. About 7:30.

7 Q. And what did you start to -- what did you do when you
8 got to the job site then?

9 A. Well, first thing you've got to set your bypass pump.

10 Q. I'm sorry.

11 A. Set your bypass pump. That's the first thing we would
12 do.

13 Q. To pump water.

14 A. To pump the sewer out.

15 Q. And that's the pump you described earlier?

16 A. Right.

17 MR. DAUBIN: This is Brian Daubin, PG&E. Is that, is
18 that for the water --

19 MR. ORNELAS: The sewer.

20 MR. DAUBIN: -- the ground water or is that for the
21 sewer pipe?

22 MR. ORNELAS: For the sewer pipe.

23 MR. DAUBIN: It's their bypass for the sewer.

24 MR. ORNELAS: It's the bypass for the sewer, right.

25 BY MR. SHORI:

1 Q. Okay. So essentially where you're going to cut the
2 sewer main. Is that why you put the bypass?

3 A. Right, before you break the pipe, you set your bypass,
4 make sure you don't have any sewer water into the pit.

5 Q. Where you're going to be working.

6 A. Right.

7 Q. And this is again the insertion pit area.

8 A. Right.

9 Q. Had you done any excavation by the gas pipe by this
10 point?

11 A. No.

12 Q. What did you do next?

13 A. We (indiscernible) the manhole. We (indiscernible) the
14 manhole.

15 Q. Now what had you been told when you had your discussion
16 with Mr. Poulo on Friday in terms of what did he expect from you
17 or what was, what was indicated to you in terms of --

18 A. Well, that was -- he asked me when we going to pothole
19 the gas main, and that was on Friday, but I think (indiscernible)
20 job before. I'm not sure. But that was -- he asked me, when you
21 going to pothole the gas main. I tell him on Monday. So, okay,
22 he say okay. I'll be back on Monday. So he don't stay. It
23 wasn't a very big conversation or he not even ask me what we doing
24 there and when he ask me what we doing there, it was Monday we
25 pothole the gas main. He said what the reason you need to pothole

1 the gas main. Because we have this pipe, this long pipe we're
2 going to hook up the manhole, and then we're going to start burst
3 this pipe. And so I don't explain too much but I just let him
4 know what the risk with burst the pipe.

5 Q. Did you tell him what work you were going to be doing or
6 what -- did you talk about any kind of equipment, work, the scope
7 of what you were going to be doing when you did talk to him on
8 Friday?

9 A. Well, he saw all the winches on the pipe and I explain
10 it, what -- how that work and he say it's fine. He don't really
11 ask too much. So he just staying there, look around and pretty
12 much it.

13 Q. Let me make sure I understand this. Did you have -- you
14 took the manhole out. There is no manhole when you --

15 A. It was old manhole. Had to put a new one.

16 Q. Okay. So at this -- on Friday or maybe on Monday, when
17 did you take the manhole out?

18 A. I don't remember that point right there but I know we
19 dig it out before we do any bursting.

20 Q. But I mean you don't recall if you pulled that out on
21 Friday or Monday. It's a pretty big part of the project, isn't
22 it?

23 A. Right.

24 Q. So did you pull that out on Friday or did you pull it
25 out on Monday?

1 A. I'm not sure.

2 Q. On Monday, was it pulled out? By Monday, by the time
3 you got to the job site on Monday, was the manhole pulled out and
4 was the winch in place?

5 A. No.

6 Q. So did you do that on Monday?

7 A. On Monday.

8 Q. Okay. Would you have to pull the manhole out before you
9 could put the winch in?

10 A. Yes, we need to pull out the manhole, right, because the
11 winch is cover. We got a 8 x 10 hole so we can set the winch. So
12 we need to pull out that manhole before you set that winch.

13 Q. So I guess I'm still finding it a little hard to
14 understand then that the manhole wouldn't be out. It's either out
15 on Monday when you get there or you pull it out on Monday in order
16 to do it. So I think it's a straight enough question to try to
17 get an answer to, and I don't know if I'm getting it.

18 MR. CHHATRE: Off the record for a second.

19 (Off the record.)

20 (On the record.)

21 MR. CHHATRE: Back on the record.

22 UNIDENTIFIED SPEAKER: Stay off the record for just a
23 minute.

24 MR. CHHATRE: Off the record.

25 (Off the record.)

1 (On the record.)

2 MR. CHHATRE: Back on the record.

3 BY MR. SHORI:

4 Q. So did you put the winch on Monday when you got to the
5 job site? At some point, did you end up putting the winch in, in
6 place?

7 A. What I'm saying, if we take out the manhole on Friday,
8 we set the winch on Monday. If we don't take out the manhole on
9 Friday, we've got to take it out on Monday, and then take up the
10 manhole and then set the winch.

11 Q. Okay.

12 A. So by the time we set the winch, I mean, you know, but
13 definitely you've got to take out the manhole first before you do
14 anything.

15 Q. Okay.

16 MR. DAUBIN: Brian Daubin with PG&E.

17 MR. SHORI: Let me get one question in.

18 MR. DAUBIN: Okay. Go ahead and ask him.

19 BY MR. SHORI:

20 Q. When you met with Mr. Poulo, did he tell you to call him
21 before you started doing any work around the gas line or did he
22 say I'll come to the site and without any more direction? What
23 were you told in terms of when you had your discussion on Friday
24 with Mr. Poulo?

25 A. He just come up and ask me when you going to pothole the

1 gas main. I said we're going to pothole on Monday, and he come up
2 on Monday.

3 Q. Okay. So when you -- let's say by Monday, you're
4 definitely -- you said you're putting the winch in and in order to
5 do that, the manhole has to be out.

6 A. Right.

7 Q. So the manhole would have been pulled either Friday or
8 Monday, but it had been done by Monday?

9 A. Right.

10 Q. Okay. Did you consider that part of your potholing
11 portion of the work?

12 A. No. Something different.

13 Q. And why is that?

14 A. Well, manhole sits one place and the gas main sits the
15 other place, all right. So we are -- because the manhole sometime
16 sits close to the gas main.

17 Q. Okay. After you put the winch in, after the manhole is
18 out, what did you do next?

19 A. We work on the pothole. We work on the gas main, too,
20 sometime.

21 Q. Okay. But you didn't call anybody. Were you asked to
22 call anybody before you started working on that, the potholing?

23 A. Well, PG&E inspector was there all the time.

24 Q. Okay. So let's step back then. When did, when did
25 Mr. Poulo show up on Monday?

1 A. He was there on Friday. After 7:30 on Monday.

2 Q. So he was there at 7:30 --

3 A. Yes.

4 Q. -- in the morning --

5 A. Right.

6 Q. -- on Monday?

7 A. Right.

8 Q. And then you proceeded to pothole the gas line?

9 A. Right, right.

10 Q. Okay. Where was Mr. Poulo while you were doing this
11 work?

12 A. Well, he was there for some time, and then after that,
13 he just go around, you know, I got too many activities going on at
14 the same time. So I didn't pay attention, if he's sitting in the
15 truck, standing there or not. I just want to concentrate, you
16 know, work on the gas main, get my pipe ready because you see my
17 note, we start 7:30 and we start bursting the pipe by 11:00. So
18 we got -- so between that time, we, you know, it take about 3
19 hours to burst the pipe. So that means we don't do any activities
20 before we brought all the pipe out. But I don't remember exactly
21 if Mr. -- if the inspector was there all the time or just sitting
22 in the truck or I don't know. But I know he showed up Monday.

23 Q. Okay. So he was there at 7:30. Did you talk to him?

24 A. Yeah.

25 Q. And what was the discussion about when you talked to

1 him?

2 A. Nothing, just I told him we were going to pothole the
3 gas main pretty much.

4 Q. And then what did you use to pothole?

5 A. Hand.

6 Q. Hand tool equipment.

7 A. Hand tool, yeah.

8 Q. Even the asphalt? Did you break the asphalt --

9 A. No, we ripped the asphalt out with backhoe. We pull out
10 -- it was all cut and then the asphalt is lifted.

11 Q. And then the rest?

12 A. Then the rest all hand by two guys.

13 Q. What side did you start on? The east side or the west
14 side of the gas main?

15 A. I don't know.

16 Q. And you said the exposure was 8 feet on the west side of
17 the main?

18 A. Okay. Yeah, this is the end. From the gas main, 8 feet
19 to east side.

20 Q. Towards -- up Earl.

21 A. Up Earl. And then 3 or 4 feet to the west side.

22 Q. I think maybe we have the directions backwards.

23 A. He write on there. I don't really understand what he
24 draw. I just want to say --

25 Q. Let's just say the gas line --

1 A. Right.

2 Q. -- towards Earl?

3 A. Gas line go over on Glenvue.

4 Q. Right.

5 A. This is Glenvue. This is Earl.

6 Q. Right.

7 A. The gas line --

8 MR. CHHATRE: This is Ravi Chhatre. You want to sketch
9 to explain.

10 MR. ORNELAS: Yeah.

11 MR. CHHATRE: Will that be helpful?

12 UNIDENTIFIED SPEAKER: Or maybe use one of the ones that
13 was drawn.

14 MR. CHHATRE: Yeah, just go back to the sketch and show
15 us. This one is one page. That should be it.

16 UNIDENTIFIED SPEAKER: Does this help? Do you want to
17 use that one?

18 MR. ORNELAS: Okay. That's fine. Okay. This is the
19 gas line right here. So it's 7 or 8 feet to east side, okay.
20 This is Earl and this is Glenvue. So between the gas line,
21 between the gas line and this side, I've got like 3 feet, like 3
22 feet here. So this is the manhole here. So between this side and
23 center of manhole I think it was like 12 feet. So this hole is an
24 8 x 10. So between here, we've got about 6 feet.

25 MS. FABRY: Klara Fabry. Jose, you see the gas main has

1 to be in the intersection, and --

2 MR. ORNELAS: Well, yeah.

3 MS. FABRY: -- line drawn.

4 MR. ORNELAS: Well, yeah, sure. It could be right here.

5 MS. FABRY: Or you can change the line where you claim
6 it goes.

7 MR. ORNELAS: Let's call this (indiscernible) there.

8 MS. FABRY: Yes.

9 MR. ORNELAS: Let's call this (indiscernible) there.

10 This is the gas line right here. This is the manhole. So about
11 7, 8 feet between this side, about 3 feet this side and this is
12 the winch hole. The winch hole, it was right here, right to the
13 edge of the hole, and right by the edge of the hole, we got a bar.
14 It's coming straight down and down from there, it's holding to the
15 corners way in the bottom. So it's way below the gas line, like
16 right here was the low area, like 4 feet away from here to this
17 point. The legs go into this corner and to this corner right
18 here, right in the bottom. The winch sit out here right by the
19 edge. So I don't know if --

20 BY MR. SHORI:

21 Q. So basically then at this point you had -- you talked to
22 Mr. Poulo, he was there 7:30. He didn't convey anything to you in
23 terms of -- it didn't sound like you had any discussion with him.

24 A. No.

25 Q. Okay. So at some point, you don't recall whether he was

1 still there or whether he left.

2 A. No.

3 Q. Okay. And you went ahead and did your 8 foot. What did
4 you do next after you made that excavation? And you said it's 8
5 feet long. How wide and how deep?

6 MR. GOODMAN: You're not talking about the manhole.

7 MR. SHORI: No, no, the excavation on the side of the
8 main.

9 MR. ORNELAS: Well, that's 36 inches wide by 8 feet
10 long. Yeah.

11 BY MR. SHORI:

12 Q. And how deep?

13 A. About 9 feet.

14 Q. At that point, did you see the sewer line?

15 A. Yeah, I would say within about 8, 9 inches, then we see
16 the sewer line.

17 Q. And how much of the gas main had been exposed by that
18 point?

19 A. All accomplished.

20 Q. All around.

21 A. All around.

22 Q. Okay. So you had done your 8 feet on the west side and
23 the 3 feet on the --

24 A. Right.

25 Q. -- east side.

1 A. All the way to the bottom.

2 Q. And did you measure that at that point, what the
3 separation was between the bottom of the gas main and your sewer
4 line?

5 MR. GOODMAN: This is the old sewer line.

6 BY MR. SHORI:

7 Q. The old sewer line is fine. Did you take any
8 measurements --

9 A. I did not.

10 Q. Where did you proceed, next step?

11 A. Start bursting the pipe.

12 Q. Okay. And where did you burst until and where did
13 you --

14 A. We burst about -- from this manhole, about this far
15 right here. We stopped the hammer. We stop all the vibration.
16 There's no more vibration, and then from this point, we just burst
17 by the winch, by pressure.

18 Q. Why do you, why do you do that in terms of turning off
19 the hammer?

20 A. Because the hammers that we use are only for hard
21 ground, and this was completely wide open. So you don't need
22 hammer. This pounder, the pounder of the hammer is about an inch
23 and a half bigger than the pipe. So that one, with the vibration,
24 make the hole and the pipes come behind free. So after this
25 point, after we get at this point, we need no hammer because we

1 got it open right here and between here it was like 3 or 4 feet.

2 So you have no problem with the 10-ton winch up here.

3 Q. Okay. Is that normal practice for you then?

4 A. It's normal. We just don't, even if it's nothing there,
5 we do it all the time. You don't need.

6 Q. After that point, your sewer line is in. It replaced
7 the old sewer line. Did you take any clearance measurements at
8 that point between the new sewer line you put in and the bottom of
9 the gas main?

10 A. That's when I called Mr. Steven to come up and take a
11 look at it. I show what the distance between that sewer and the
12 bottom of the gas line. I don't remember how much but I know it
13 was less than a foot. So I told him this is what we got between
14 sewer and the gas line, and he make a phone call and come back,
15 like 10, 15 minutes after and say, well, what else we can do
16 there? I say nothing we can do there unless do something else,
17 but nothing we can do right here. So I don't remember, he make
18 another phone call or he say, okay, just put something between
19 them. So I told him what am I going to put? He said, I don't
20 know, put a piece of wood. So we got wood down in the -- where we
21 were putting the pipe together and put a piece of wood there but I
22 don't if I put it all the way to the main or just (indiscernible),
23 I'm not sure, but I know it was less than a foot.

24 Q. When you called him, I mean how long did it take for him
25 to get to you after you called him? Did he step out of his truck

1 and walk over to the site or how long did you wait for him?

2 A. I don't remember, but I know he come up and he look at
3 it.

4 Q. And do you recall around what time that was?

5 A. I don't know. It could be at noon or after noon.

6 Q. This is still Monday.

7 A. Right.

8 Q. So after the discussions about the clearance and
9 everything else, what did you do?

10 A. Backfill.

11 Q. And was Mr. Poulo still there when you did the backfill?

12 A. He said go ahead backfill.

13 Q. Did he see what backfill you were putting in?

14 A. I don't remember. If he tell me to put sand, I will put
15 sand, but I don't remember. If we don't backfill with sand, we
16 backfill with class 2 base rock.

17 Q. And by that point, had you put in some sort of a
18 separation like you said he had asked to do, wood or anything
19 else? Had you put in some sort of a separator?

20 A. No.

21 Q. You did not put anything in?

22 A. Well, like I tell you, he told me to put something
23 between there, but I don't remember how much piece of wood we put.
24 Maybe it can be a 2 x 6 or two 2 x 6's, but he said put something
25 in there.

1 Q. Okay. And that's what I'm asking is you did put
2 something there --

3 A. Right.

4 Q. -- even though you don't recall maybe what size?

5 A. A 2 x 6, maybe two, make like 3 x 6, about an inch and a
6 half, but I don't remember how many I put.

7 Q. When you say a 3 x 6, are we talking about 6 inch
8 vertical or 3 inch vertical.

9 A. 3 x 6, they call them 2 x 6 but I know it's inch and a
10 half.

11 Q. Okay. So you put them horizontally then.

12 A. So it makes it 3 inches, right. But like I tell you, I
13 don't remember exactly.

14 Q. And where would that have been? On top of your line?

15 A. On top --

16 Q. On top of the sewer line.

17 A. -- of the sewer line, right.

18 Q. And then the fill would go over that?

19 A. Right.

20 Q. And after that point, did you refill the rest of the
21 excavation?

22 A. Yes.

23 Q. How did you compact it after you backfilled it?

24 A. We use the jumping jack or a walker, the stone walker is
25 small.

1 Q. And what's the process for you to get it recoated with
2 the asphalt after you've done that? Do you have to get some other
3 clearance before you go ahead and do asphalt or did you go ahead
4 and do asphalt after the whole process?

5 A. We do asphalt after we go like 1, 2, 3 blocks. We put
6 temporary cover on top.

7 Q. Okay. So you don't have to wait for a city inspector or
8 somebody else to come by and approve anything before you do the
9 asphalt?

10 A. No.

11 Q. Did you have any further correspondence or further
12 discussions with Mr. Poulo after that, after that date?

13 A. No.

14 Q. Had you met with -- again, this was what part of the
15 project? Had you met with any other PG&E representative at the
16 other parts of the project before this, this additional piece got
17 added on?

18 A. No.

19 Q. Okay. So your only discussions and correspondence and
20 meetings with anybody from PG&E based on what you're telling me is
21 Friday --

22 A. Uh-huh.

23 Q. -- with Mr. Poulo --

24 A. Uh-huh.

25 Q. -- and then Monday with Mr. Poulo --

1 A. Right.

2 Q. -- at this location?

3 MR. GOODMAN: Are you including the backfilling?

4 BY MR. SHORI:

5 Q. I'm including all the discussion basically that was
6 indicated that took place on Monday, Monday morning and then
7 whatever Monday afternoon?

8 A. Yeah, because he said go ahead backfill. At that time
9 we were (indiscernible) Monday, okay, he was there. So on
10 Tuesday. Sorry.

11 Q. And you're saying Tuesday?

12 A. Yeah. Whatever the next day falls on.

13 Q. Now I'm confused. So at this stage, this is not -- the
14 discussion is not Monday.

15 A. Okay.

16 Q. So you have additional discussions beyond Monday.

17 A. Okay. We don't have -- I don't have record before me
18 but I'm saying you see in my diary, it say we work after 8:00,
19 right? Obviously we don't backfill on Monday. So the phone call
20 I make on Tuesday, that's when I call him to come up and look at
21 the gas line and then after that we backfill same day.

22 Q. All right. Okay. I'm going to take a couple of more
23 minutes just to make sure I understand. So afternoon on Monday,
24 Mr. Poulo was there. That's when you had the discussion about the
25 filling and the clearance?

1 MR. GOODMAN: Are you talking about Monday?

2 MR. SHORI: Yes.

3 MR. ORNELAS: That was on Tuesday.

4 BY MR. SHORI:

5 Q. Tuesday.

6 A. Yeah, it was on Tuesday.

7 Q. This discussion that we just discussed about being on
8 Monday was Thursday -- Tuesday.

9 A. I'm sorry. It was on Tuesday.

10 MR. GOODMAN: He's saying Tuesday. I know it sounds
11 like Thursday, but it's Tuesday.

12 BY MR. SHORI:

13 Q. So beyond Tuesday, did you have any further discussions
14 with Mr. Poulo?

15 A. No.

16 Q. That's it for me. Thank you.

17 MR. KATCHMAR: Peter Katchmar, USDOT, Pipelines and
18 Hazardous Materials Safety Administration.

19 BY MR. KATCHMAR:

20 Q. Good morning. On your documentation, Jose, it says, it
21 says that you started the pull at 1:00 p.m.

22 A. Right.

23 Q. And then it says pipe cement 8:00 p.m. Okay. Came out.
24 I thought it said cement. I'm sorry. Pipe came out at 8:00 p.m.
25 Seven hours to pull 300 feet, was a lot of sand.

1 A. Right.

2 Q. And can you explain what that means?

3 A. Sure.

4 Q. What did you mean by that?

5 A. The sand, the old clay pipe, it wasn't (indiscernible).
6 It was like whenever they put it in, long time ago.

7 Q. They backfilled --

8 A. They backfilled with sand just on top, right.

9 Q. Okay.

10 A. So that sand come out when we pull the pipe. You know
11 what I mean?

12 Q. Is that not common?

13 A. It's common, inside the old clay pipe. You know, we
14 will pull the pipe, the sand come from the hammer, pushing into
15 old hole. So from that hole, we put it on backhoe and take it out
16 to the dump. But that was not into the gas line. This is
17 something different. This come out from the sewer.

18 Q. Okay. I was just asking. So it wasn't normal soil. It
19 was a lot of sand.

20 A. It was a lot of sand but that happen a lot of times on
21 other different projects. When the people just bury in sand,
22 other pipe, all the clay pipe, and then after that, they put in
23 (indiscernible) or, you know, a lot of people using that. That's
24 normal, because we replace with bigger pipes. So the sand come
25 out. It's no place to go. So it comes out right in the front of

1 old pipe, the new pipe.

2 Q. Okay. So how did you remove that sand? You're saying
3 you had to remove the sand?

4 A. We had to remove. So can look at the hammer, we come to
5 underneath. So got a guy down there, throw them into the bucket.
6 We got to run the backhoe and the backhoe just go down there and
7 the guys shoveled it and just pick it up.

8 Q. Now is that why you had such a large hole on the west
9 side of the gas main?

10 A. Right. Exactly. So can get the bucket.

11 Q. So you can get the bucket down there --

12 A. Exactly.

13 Q. -- and a guy down there to shovel?

14 A. Right.

15 Q. Okay. Now on the east side of the gas main --

16 A. Uh-huh.

17 Q. -- you were talking to some other people about the
18 distance between the winch, the manhole where the winch was and
19 the pipe --

20 A. Right.

21 Q. -- was anywhere from 6 to 8 to 12 feet?

22 MR. GOODMAN: I think that needs to be confirmed.

23 MR. KATCHMAR: It needs to be confirmed but I'm --

24 BY MR. KATCHMAR:

25 Q. I guess what I'm getting at, from the pipe, east side of

- 1 the pipe, how much dirt was removed?
- 2 A. About 3 feet, about 3 or 4 feet.
- 3 Q. Okay.
- 4 A. About 36 inches wide.
- 5 Q. So you had, you had --
- 6 A. We exposed the pipe on both sides.
- 7 Q. Right. So, but I'm saying, you had dirt on the west --
- 8 A. Right.
- 9 Q. -- and then you had an 8 foot excavation.
- 10 A. Right.
- 11 Q. Then you had the pipe.
- 12 A. Right.
- 13 Q. And then you had 3 foot excavation and then you had
- 14 dirt.
- 15 A. Right.
- 16 Q. Then you had the manhole.
- 17 A. Right.
- 18 Q. Okay. So on the east side of the main, you're saying
- 19 there was an open air --
- 20 A. Uh-huh.
- 21 Q. -- 3 foot by 3 foot --
- 22 A. Right.
- 23 Q. -- by --
- 24 A. 8 feet or 9 feet.
- 25 Q. -- 8 feet or 9 feet deep.

1 A. Uh-huh.

2 Q. Okay. And I also want to confirm, because it's a little
3 unclear to me, this -- where you say the 3 inch pump will not
4 handle all the flow --

5 A. Uh-huh.

6 Q. -- that's not influx of ground water. That's a bypass
7 for the sewer, correct?

8 A. Right.

9 Q. So you're saying you did not have a problem with the
10 influx of ground water.

11 A. No, no. The problem --

12 Q. You had an influx --

13 MR. GOODMAN: Let him finish.

14 MR. KATCHMAR: All right.

15 MR. ORNELAS: There's too much flow in the line. So our
16 3 inch pump it not handle. The manhole start come up. So I just
17 take everything out and call for a 4 inch pump, and that pump
18 handle all the flow.

19 MR. DAUBIN: This is Brian Daubin, PG&E. So that flow,
20 is that for water or sewer?

21 MR. ORNELAS: Sewer.

22 MR. DAUBIN: Sewer. Thank you.

23 MR. ORNELAS: Uh-huh.

24 BY MR. KATCHMAR:

25 Q. Okay. So when you had installed the 3 inch pump, you

1 say it backed up in the manhole.

2 A. Yeah, well, it started to seep when the pump is not
3 going to handle all the flow.

4 Q. How do you know that?

5 A. It's very simple. The water start come up.

6 Q. Where?

7 A. In the manhole.

8 Q. Okay. So the manhole is still in.

9 A. Yeah.

10 UNIDENTIFIED SPEAKER: But we're talking about different
11 manholes.

12 MR. ORNELAS: Yeah, different manholes, not --

13 MS. FABRY: This is the west side manhole.

14 MR. ORNELAS: Yeah.

15 UNIDENTIFIED SPEAKER: Can we go off the record? I
16 think we need to clarify this.

17 MR. CHHATRE: Off the record.

18 (Off the record.)

19 (On the record.)

20 MR. CHHATRE: Back on the record.

21 MR. KATCHMAR: This is Pete Katchmar still.

22 BY MR. KATCHMAR:

23 Q. Okay. So west of your insertion pit on Earl, you have
24 another manhole that you have to -- you put your 4 inch pump in.
25 Well, you put your 3 inch pump in first.

1 A. Uh-huh.

2 Q. And where were you pumping that sewage? Where were you
3 pumping that sewage?

4 A. Okay. My pump is set up here. This is the work area
5 between this manhole and this one.

6 Q. Right.

7 A. So I want no water here. I want to switch this water
8 here. So I block this manhole here, set up my 4 inch pump, run my
9 hoses all the way to the manhole base this manhole.

10 Q. To the east.

11 A. To the east.

12 Q. The next manhole to the east.

13 A. Right.

14 Q. Can you draw a -- draw your hose and put a little
15 manhole down there, from there to there and then write bypass on
16 it.

17 A. Let's call this a manhole. Okay. This is the line.
18 This line is coming up here, the sewer line, okay. We set the
19 pump up here, run out the hoses right along here, crossing this
20 bypass right here, and connect it right to the top of this
21 manhole.

22 Q. Okay.

23 A. So between here, there is no water.

24 Q. Right. No sewer.

25 A. No sewer.

1 Q. Write bypass.

2 A. This is the bypass.

3 Q. Yeah, write -- just --

4 UNIDENTIFIED SPEAKER: Just label it bypass.

5 MS. FABRY: Put that right on it.

6 MR. FASSETT: Pete's going to label it.

7 UNIDENTIFIED SPEAKER: Let Bob do it.

8 MR. FASSETT: Pete's the legend monitor.

9 UNIDENTIFIED SPEAKER: Very nice, Pete.

10 BY MR. KATCHMAR:

11 Q. Okay. And it comes all the way to here.

12 A. Right.

13 Q. And that is to keep the sewer water out of your

14 excavation --

15 A. Right.

16 Q. -- which is between here and here. This is your

17 excavation.

18 A. Right.

19 Q. 300 foot sewer.

20 MR. FASSETT: Please initial, Mr. Katchmar.

21 MR. DAUBIN: This is Brian Daubin of PG&E. Jose, can

22 you, with a dotted line, can you mark where the manhole that you

23 removed near the excavation would be?

24 MR. ORNELAS: Yeah, this is the manhole we removed.

25 MR. DAUBIN: So there was, there was no separation

1 between where the winch -- there's no separation between the
2 excavation between where the manhole was removed and where the
3 winch was placed? The manhole was removed for the winch and the
4 same excavation was used?

5 MR. ORNELAS: Right.

6 MR. DAUBIN: Thank you.

7 MR. CHHATRE: Jose, is that a correct depiction of what
8 you're telling us? It is now a compound drawing with --

9 BY MR. KATCHMAR:

10 Q. Okay. This is your excavation.

11 MS. FABRY: We need both of them to initial it.

12 MR. CHHATRE: Well, we'll assign this one to Jose. I
13 want to make sure he's comfortable with it.

14 MR. FASSETT: Sure. I agree.

15 MR. KATCHMAR: Okay. I'm going to make a new one.

16 MR. CHHATRE: Are you okay with this drawing? Is that a
17 correct depiction of what you did?

18 MR. ORNELAS: Yes.

19 MR. KATCHMAR: And the manhole at the bottom, it's
20 placed there just because we ran out of paper.

21 MR. CHHATRE: I understand.

22 MR. ORNELAS: Well, there is no house on that street no
23 more. This is the end right about this, a couple hundred feet.

24 MS. JACKSON: No, no, he's talking about the other
25 manhole.

1 MR. ORNELAS: The bypass.

2 MS. JACKSON: It's close in terms of how manholes get
3 placed, but it's across from -- it's far away from the gas main.

4 MR. FASSETT: This is Bob Fassett. While you have the
5 drawing up there and you get this dueling pen, could you show, you
6 mentioned earlier you used a 2 inch pump somewhere. Could you
7 show where that 2 inch pump was used?

8 MR. ORNELAS: The 2 inch pump is right here because
9 there's houses here.

10 MR. FASSETT: No, I understand that. But if you could
11 just label it.

12 MR. ORNELAS: For these people, this water, there's no
13 place to go. So we put pump right here.

14 MS. JACKSON: The waste water --

15 MR. ORNELAS: Right.

16 MS. JACKSON: -- to the sewer.

17 MS. FABRY: Just make a note that that small pump.

18 MR. FASSETT: And that's a 2 inch pump to handle waste
19 water, not ground water.

20 MS. FABRY: Correct.

21 MS. JACKSON: For the houses inside the excavation.

22 MR. CHHATRE: I don't mind the discussion, but please
23 identify yourselves. The transcriber is going to have a tough
24 time writing down who's saying what.

25 MR. FASSETT: I'm sorry. I apologize to the transcriber

1 if you haven't identified my voice. So this is Bob Fassett
2 speaking. I asked about the labeling of the 2 inch pump.

3 BY MR. KATCHMAR:

4 Q. Is that okay for you? This is Peter Katchmar. Is that
5 okay?

6 A. Yes.

7 MR. CHHATRE: Please put the date and initial the
8 drawing.

9 MR. KATCHMAR: Okay. I'm going to do another one. I
10 put my initials by whatever I wrote. Okay.

11 MR. CHHATRE: I do want to remind everyone that we have
12 (indiscernible). We're on the record.

13 MR. KATCHMAR: Yeah, we're on the record. This is Peter
14 Katchmar. I'm going to draw this birds eye view. Okay.

15 MR. FASSETT: Yeah, what street is that to the left?
16 This is Bob Fassett.

17 MR. KATCHMAR: E A R L. I apologize. I'm not a very
18 good drawer, but I'm trying to do this better.

19 BY MR. KATCHMAR:

20 Q. So this is your winch, right? Brace, correct?

21 A. Right.

22 Q. That's your brace. And then you have some distance of
23 dirt and then you have the pipe and so this is all dirt. You've
24 got about what? 3 feet.

25 A. 3 feet.

1 Q. 3 feet. And over here --

2 A. This is Earl, right?

3 Q. This is what?

4 A. Earl.

5 Q. Earl. Yes. And then you've got 8 feet?

6 A. Or 7 feet.

7 Q. 7 feet.

8 A. Yes.

9 Q. And this is dirt?

10 A. Correct.

11 Q. So this distance is 3 foot from there to there and this

12 is 7 feet from there to there.

13 A. Right.

14 Q. Okay. And then this is dirt. Is that correct?

15 A. Yes.

16 Q. Okay.

17 UNIDENTIFIED SPEAKER: While you're up there, Pete, can

18 you go ahead and dimension the winch trench.

19 MR. KATCHMAR: All right.

20 UNIDENTIFIED SPEAKER: He said it was 8 x 10 I believe.

21 BY MR. KATCHMAR:

22 Q. Is this 10?

23 A. 8.

24 Q. That's 8 feet.

25 A. Uh-huh.

1 Q. And then this is how much? 10 feet.

2 A. Yeah.

3 Q. Why did you have this little area here?

4 A. Oh, no, that is where the winch is. This is the winch.

5 This is the winch. It's sitting right on top, the winch, you've

6 got your legs out. The leg -- I mean the width on the leg --

7 Q. So it comes down like that.

8 A. The bars go straight down to the excavation of the hole.

9 Q. Oh, so this is on top of the ground.

10 A. This is on top of the ground.

11 Q. Okay.

12 A. So the bar is at the edge of the winch. This goes

13 straight down.

14 Q. So the winch is here, and your cable runs down like

15 this?

16 A. Right. It's coming from a 6 x 6 square bar.

17 Q. So why do you have the braces?

18 A. The braces, you put it down in the bottom, so when the

19 pipe come out, it don't get any higher or lower because they've

20 got a mark of center.

21 Q. Okay. So you're saying there's some kind of a bar

22 there?

23 A. Right.

24 Q. And what does that bar do?

25 A. Well, the cable come off in the winch and going down, in

1 the pulley block.

2 Q. Pullies.

3 A. Right. And same thing here. And then --

4 Q. Oh, so there's a pulley here?

5 A. Right.

6 Q. And a pulley here?

7 A. Right.

8 Q. Okay.

9 A. So the braces go this way so can support or hit the bar
10 all the way in the back. So when the --

11 Q. I see. Okay.

12 A. When the pipe come out, we sure we have enough --

13 Q. Distance.

14 A. -- to cut it. Right, to cut it right here. So after
15 that, we can put the new manhole there. That way we're sure we
16 have enough pipe there.

17 MR. DAUBIN: This is Brian Daubin with PG&E. Where are
18 those braces contacted to? Are they contacted to --

19 MR. ORNELAS: They're contacted to the hole where --

20 MR. DAUBIN: The pulley block or --

21 MR. ORNELAS: No.

22 MR. DAUBIN: Up top.

23 MR. ORNELAS: They contact into dirt but we put sheet
24 piles in the corner --

25 MR. DAUBIN: Uh-huh.

1 MR. ORNELAS: -- so the braces are supported.

2 MR. DAUBIN: So they attach from the top of the winch.

3 MR. ORNELAS: This is the bottom surface. This is the
4 bottom.

5 MR. DAUBIN: Right.

6 MR. ORNELAS: This is the bottom of the manhole.

7 MR. DAUBIN: Right. And so the braces attach from the
8 bottom of the manhole and go up to the winch on top of the
9 pavement.

10 MR. ORNELAS: Like this way, right. This is the bottom
11 and the brace is going to the corners. We put sheet piles
12 (indiscernible) --

13 MR. DAUBIN: Okay.

14 MR. ORNELAS: -- (indiscernible) --

15 BY MR. KATCHMAR:

16 Q. Okay. So the concern, the concern I thought was that
17 there was force on this dirt from the winch --

18 A. Well --

19 Q. -- holding --

20 A. Yeah.

21 Q. Because you're pulling. You've got to hold against
22 something but you don't. How did you secure the winch up here?

23 A. The winch stay there. Sometime we just back off the
24 hauler or sometimes just leave them on the truck, you know, that
25 winch we pull with our flatbed truck. Sometimes we just let them

1 on the truck.

2 Q. So sometimes it's heavy enough --

3 A. It's heavy enough to stay there by itself.

4 Q. -- that once you start pulling, it doesn't fall into the
5 hole.

6 A. No. All the weight is here. All the pulling is right
7 here but pretty much all the support are on the braces.

8 Q. Okay.

9 MR. KATCHMAR: Are we all happy with that explanation?

10 MR. CHHATRE: Just close that W at the bottom and make a
11 straight line there because that is not a hole.

12 MR. KATCHMAR: That is not a hole. I thought it was a
13 hole.

14 MR. ORNELAS: That's the winch.

15 MR. KATCHMAR: Right. Winch.

16 MR. FASSETT: This is Bob Fassett. What's that in the
17 upper right-hand corner on the bottom?

18 MR. KATCHMAR: This?

19 MR. FASSETT: No, on the bottom. The circle. Is that a
20 pulley or something?

21 MR. KATCHMAR: Here?

22 MR. FASSETT: No, up top.

23 MR. KATCHMAR: This is pulleys.

24 MR. CHHATRE: It's a pulley block.

25 MR. KATCHMAR: Pulley, pulley.

1 MR. FASSETT: Okay.

2 MR. KATCHMAR: The winch is on top of the group --

3 MR. FASSETT: Well, just so I understand. It wasn't
4 clear to me because --

5 MR. KATCHMAR: That's fine. I just put pulley, pulley.

6 MR. FASSETT: -- you have a cable on top of a pulley
7 pulling west.

8 MR. KATCHMAR: Pulling from the east or from the west to
9 the east.

10 MR. FASSETT: I'm trying -- I'm doing a free body
11 diagram in my head.

12 MR. KATCHMAR: I'm sorry.

13 MR. CHHATRE: That's what he's saying, yes.

14 MR. KATCHMAR: Pulley. Sorry. You're right. So that's
15 a pulley, that's a pulley and that's a winch.

16 BY MR. DAUBIN:

17 Q. Jose, the pulley blocks on the bottom you said were --
18 I'm sorry. This is Brian Daubin of PG&E. You said that the
19 pulley blocks on the bottom were attached to a 6 x 6 steel post
20 essentially?

21 A. Right, it's something like that.

22 Q. Okay.

23 A. This --

24 MR. KATCHMAR: And where is that? Is that here?

25 MR. ORNELAS: Yeah, the part here. This here. This bar

1 is like a pin.

2 MR. KATCHMAR: Okay.

3 MR. ORNELAS: This bar --

4 MR. KATCHMAR: Like that?

5 MR. ORNELAS: -- you use it, the high roller system, put
6 on top of the winch, we'll use this lifter and just drop it
7 straight down into the hole.

8 BY MR. DAUBIN:

9 Q. Got it.

10 A. So down in the bottom is have some assistant to use --

11 Q. Braces.

12 A. -- braces right here. So the pressure, all the pressure
13 is back here.

14 Q. So the question being what is the pulley block on top
15 connected to? Is it also connected to that same bar?

16 A. That is correct. Inside, inside the winch, is a big
17 like 5 feet wide, like 10 feet long, that's part of the --

18 Q. A drum.

19 A. -- it's not a drum inside, but it's high roller.

20 Q. And so there's a pulley block to the entrance of the
21 winch itself?

22 A. Right.

23 Q. Okay.

24 A. The cable come out from this one and come out to the
25 first pulley block, this is the cable drum right out here, coming

1 down and down here is another pulley that go right to the pipe.

2 Q. And so this -- I'm trying to understand. Where did
3 those braces connect to? Do they connect to the 6 inch upright or
4 do they connect to the body of the winch itself?

5 A. They connected to the bottom. It's like a --

6 Q. They connect to the pulley block.

7 A. It's like this (indiscernible).

8 Q. But they -- and so you're showing a representation of
9 the fact that --

10 MR. KATCHMAR: This is your shaft?

11 MR. ORNELAS: Uh-huh.

12 MR. KATCHMAR: That's the green shaft?

13 MR. ORNELAS: Right in the bottom. Right in the bottom
14 have another small piece of 1 1/2 inch by 3, that is part of the
15 winch that stays all time but the other ones, we take it off every
16 time we use it. So this one goes to the bottom of the hole, way
17 in the bottom.

18 BY MR. DAUBIN:

19 Q. Correct.

20 A. We'll put this way. So when you start pulling, get
21 pressure on the winch, this pressure (indiscernible).

22 Q. So to be clear, earlier you said that the, that the
23 braces attached from the bottom of the pit on the west side --

24 A. On the winch.

25 Q. -- but you said they went up to the top of the winch.

1 That is not the case.

2 A. No.

3 Q. They go to the bottom of the pulley block --

4 A. Right.

5 Q. -- right?

6 A. Right.

7 Q. So that being the case, what do those, what do those
8 braces push against? Are they pushing against the shoring of the
9 westerly wall or --

10 A. We use sheet piles.

11 Q. Sheet piles.

12 A. It's 6 x 6 ties or something that can hold it and drive
13 down into the dirt so when it's got pressure, that was going over,
14 (indiscernible) pretty much pressure when you drive down. So that
15 stops the (indiscernible).

16 Q. And you said those were 6 inch by 8 inch sheet piles?

17 A. Sometimes we use the sheet piles like 1 inch by 12.

18 Q. 1 inch by 12.

19 A. Yeah.

20 Q. Do you remember what you used that day? Was it the 1
21 inch by 12 inch sheet piles?

22 A. I don't remember but either one or the other. We put it
23 2 feet into the ground.

24 Q. 2 feet.

25 A. Right.

1 Q. Thank you.

2 MR. KATCHMAR: Okay. You may have understood that,
3 Brian. I don't know --

4 MR. FASSETT: Well, I have -- this is Bob Fassett. I
5 have a question. I need to go up there. I need to show it. I
6 need to --

7 MR. KATCHMAR: I know, but I'm still on the pilings.

8 MR. FASSETT: Oh, my. That's what I would like to
9 understand.

10 MR. KATCHMAR: You want to do blue?

11 MR. FASSETT: Well, I was going to point. So as I
12 understand it, this is the brace on the bottom of the winch coming
13 out into the corners of your bed.

14 MR. KATCHMAR: Right.

15 MR. FASSETT: And you've got 6 x 8 dunnage or some kind
16 of columns there.

17 MR. ORNELAS: Sheet pile.

18 MR. FASSETT: Sheet pile.

19 MR. ORNELAS: Right.

20 MR. FASSETT: So that's anchored into the soil.

21 MR. KATCHMAR: Right.

22 BY MR. FASSETT:

23 Q. So when the braces push on that sheet pile, what's
24 resisting that? Is it the wall of the excavation that's resisting
25 the sheet pile?

1 A. Pretty much that's all (indiscernible) in the bottom.
2 So the support sometime in the wall.

3 Q. Okay.

4 A. But pretty much all the weight is hold in the bottom.
5 That's what we did, different on surface of the bottom of the
6 manhole. We tried some pressure, we don't have any weight in the
7 top. All the weight is in the bottom.

8 Q. So it's not pushing on the bank at all?

9 A. No. It's pushing --

10 Q. It's only pushing on the columns.

11 A. Right.

12 MS. FABRY: Klara Fabry. Anywhere close by you have
13 this kind of set up, anywhere, a close location?

14 MR. ORNELAS: No.

15 MR. FABRY: No.

16 BY MR. KATCHMAR:

17 Q. Are you doing this work today? Yesterday?

18 A. I do it yesterday.

19 Q. Okay. But let me -- here's a pile and here's a pile.

20 A. Right.

21 Q. So I guess side view you wouldn't really see them but --

22 A. They come down 2 feet.

23 Q. I know. But they're here. So I can't really show them
24 here.

25 MR. DAUBIN: Draw the wall. Straight line.

1 MR. KATCHMAR: Draw a wall here.

2 MR. DAUBIN: No, just draw a straight line down on the
3 left-hand side. That's your westerly wall.

4 MR. KATCHMAR: So here's your blue.

5 MR. DAUBIN: That's your westerly wall.

6 MR. KATCHMAR: This is dirt on this side. And then your
7 green is going to be a pile, correct? Right here. And one on the
8 other side, you know, over here.

9 MR. DAUBIN: Right.

10 MR. KATCHMAR: And then there's a brace from that point
11 to that point --

12 MR. ORNELAS: Right.

13 MR. KATCHMAR: -- holding this back against the east
14 wall.

15 MR. ORNELAS: Right.

16 MR. KATCHMAR: Are we okay with that?

17 MR. FASSETT: Oh, three minutes ago.

18 MR. CHHATRE: Yeah.

19 MR. FASSETT: I'm reading you 5 x 5, buddy.

20 MR. KATCHMAR: I wasn't.

21 MR. FASSETT: Okay.

22 MR. CHHATRE: This is Ravi Chhatre. Put down braces.

23 BY MR. KATCHMAR:

24 Q. What did you call this pole, sir?

25 A. I don't know. It's a 6 x 6 pulling bar or something.

1 MR. NICHOLSON: This is Matt Nicholson, NTSB. While
2 you're labeling, give us approximate dimensions on the braces.
3 Are they angle iron, (indiscernible)? Is it structural steel? Or
4 is it round?

5 BY MR. KATCHMAR:

6 Q. You said 1 inch by (indiscernible) or something.

7 A. 3 x 3 brace. Oh, well, see, the ones attached to this
8 bar --

9 Q. These here are braces, right?

10 A. Yeah, this is like a 3 x 3 because --

11 Q. Wood or metal?

12 A. Metal. Steel.

13 MR. NICHOLSON: 3 x 3 angle.

14 MR. ORNELAS: 3 x 3, right.

15 MR. NICHOLSON: Angle.

16 BY MR. KATCHMAR:

17 Q. 3 inch.

18 A. 3 inch by 3.

19 Q. 3 inch by 3 inch, what did you say? Angle iron.

20 A. Angle iron.

21 Q. Braces. Okay. That's these. And sheet piles and how
22 big are they?

23 A. They are 1 x 12.

24 Q. 1 inch --

25 A. 1 inch thick, 12 inches wide by 12 feet long.

1 Q. 12 feet long?

2 A. Yes, 12 inches wide, 1 inch thick, and 12 feet long.

3 Q. 1 inch thick. This is 12 feet?

4 A. Uh-huh.

5 Q. And this width?

6 A. 12 inches wide.

7 Q. 12 inches. So they're going down the hole.

8 A. Right. Minimal we have to drive down 2 feet into the
9 ground.

10 Q. Okay. So that's this and this.

11 MR. KATCHMAR: You know, I'm standing up here real close
12 to it. You guys are back there. Tell me if you're okay with it.

13 UNIDENTIFIED SPEAKER: Looks good.

14 MR. KATCHMAR: Okay, sir. Thank you very much.

15 MS. JACKSON: Mr. Katchmar, could you -- Connie Jackson.
16 Could you initial that?

17 MR. KATCHMAR: Oh, I thought I did. 1/6.

18 MR. CHHATRE: Jose, this is Ravi Chhatre. Are you -- do
19 you feel exact depiction --

20 MR. ORNELAS: Yeah.

21 MR. CHHATRE: -- of what you did?

22 MR. ORNELAS: Yeah.

23 UNIDENTIFIED SPEAKER: I hesitate on the word exact.
24 I'm sorry. It's the lawyer in me.

25 MR. DAUBIN: I don't think we disagree.

1 MR. CHHATRE: Point well taken.

2 MR. KATCHMAR: Come on. I'm a better drawer than that.

3 MR. CHHATRE: Is this schematic representative of the
4 actual --

5 MR. ORNELAS: Yes.

6 MR. CHHATRE: Okay. Will you initial that, that you
7 agree with the drawing?

8 MR. ORNELAS: Yeah.

9 MR. CHHATRE: Put your initial there. Are your initials
10 there someplace?

11 Mr. Katchmar, are you done?

12 MR. KATCHMAR: Am I done? I don't know. Hang on a
13 second.

14 BY MR. KATCHMAR:

15 Q. You have one of these documents. If you'd look on 10
16 June which was Tuesday, work performed today, you wrote -- could
17 you -- is that we connected 10 laterals? What does that say?
18 Work performed today --

19 A. That's on Tuesday.

20 Q. Tuesday, right.

21 A. Yeah. We connect 10 laterals, 10 laterals, that's all
22 the houses.

23 Q. Oh, on this 300 feet there were 10 laterals.

24 A. Right, right.

25 Q. Okay. Okay.

1 A. That's five houses on each side.

2 Q. Okay. And pour a -- is that MH, manhole?

3 A. That's a manhole.

4 Q. Oh, so you poured the manhole back.

5 A. Right.

6 Q. You put the manhole back?

7 A. Right. Well, we do the base first.

8 Q. Okay. But I'm just saying, you were done with the pull,
9 you connected the laterals to the new sewer pipe.

10 A. Right.

11 Q. And then you poured the --

12 A. Manhole.

13 Q. -- manhole.

14 MR. DAUBIN: This is Brian Daubin, PG&E. You had
15 mentioned the base. Does that mean that you poured just the base
16 or does that mean you poured the base and set the manhole.

17 MR. ORNELAS: No, just the base.

18 MR. DAUBIN: Just poured the base. Okay. Thank you.

19 MR. ORNELAS: You've got to wait to next day.

20 BY MR. KATCHMAR:

21 Q. Okay. So you have to wait for another day to --

22 A. Yeah, because the concrete don't -- it don't dry so far.
23 You've got to wait until the next day to set it.

24 Q. Okay. And is this a preformed manhole?

25 UNIDENTIFIED SPEAKER: Can we go off the record?

1 MR. CHHATRE: Off the record.

2 (Off the record.)

3 (On the record.)

4 MR. CHHATRE: Back on the record.

5 MR. KATCHMAR: Thank you, sir. I'm done.

6 MR. ORNELAS: Thank you.

7 MR. GUNTHER: Karl Gunther. I want to ask a couple of
8 questions to clarify some things asked by Sunil.

9 BY MR. GUNTHER:

10 Q. You did the potholing on Monday and the pipe bursting on
11 Tuesday. Is that correct?

12 A. No. We do the pothole on Monday and we burst on the
13 same day.

14 Q. Oh, the pipe bursted Tuesday.

15 MR. GOODMAN: He said the same day. Monday.

16 MR. ORNELAS: The same day, Monday.

17 BY MR. GUNTHER:

18 Q. You pipe bursted --

19 A. Right.

20 Q. So you potholed on Monday and you pipe burst on Monday.

21 A. Right. We start at 11:00. Between 7:30 and 11:00,
22 that's the time we take to expose the sewage pipe.

23 Q. Thank you. I just wanted to clear it up.

24 MS. MAZZANTI: No questions.

25 MR. SPERRY: No questions.

1 MR. NICHOLSON: A couple of questions.

2 BY MR. NICHOLSON:

3 Q. The braces that you're using, those are part of the
4 system?

5 A. No, we are. We (indiscernible), right.

6 Q. So you sized them and --

7 A. Yeah, basically they we cut them like 36 inches, but in
8 this case, we got to make them longer so make sure all our pipe
9 come out top to put a manhole. Then we don't have to use
10 couplings or just one piece.

11 Q. Are the original brace is also 3 by 3?

12 A. Yeah, pretty much we use in the manholes. Before we
13 take out the manhole, we adjust the winch. But in this case, we
14 got to take out the manhole before you burst. So that's the
15 reason we just had big long brace.

16 Q. All right. Those are braces that were supplied by your
17 company as part of the system?

18 A. No, no, we make ourselves.

19 Q. Did you -- do they monitor tension on --

20 A. Yes, the guy in the winch, he have a control. Whatever
21 I tell him, where the (indiscernible) in the ground, we can pick 2
22 tons, 3 tons up to 10 tons.

23 Q. And what were you using that day? Do you remember?

24 A. Pretty much like 6, 7 tons, no more than that. Unless
25 it's really, really hard ground, then we raise it but not usually.

1 Q. Okay. That's all I have. Thank you.

2 MS. MAZZANTI: Actually I do. Debbie Mazzanti, IBEW.

3 BY MS. MAZZANTI:

4 Q. When I'm looking at your log, I notice that you notate
5 -- make a notation of calling USA. Is it normal practice that
6 when you --

7 MR. GOODMAN: I'm sorry. This is Josh Goodman. I may
8 have caused that confusion by the way. That log with the USA call
9 was not from his logbook. He did not make the USA call.

10 MS. MAZZANTI: Okay. Then I'll leave that part of my
11 question out.

12 BY MS. MAZZANTI:

13 Q. Is it noted in your log, as I understand the June log,
14 is there notice or is there a notation of any conversation with
15 anyone from PG&E or -- so is it not something that you would log
16 in, that you had spoke with a PG&E employee or an inspector? Is
17 that something that you would or would not log in?

18 A. No.

19 Q. You would not log it in --

20 A. No, we don't log it in.

21 Q. -- that you had made that contact?

22 A. Right.

23 Q. Thank you.

24 MS. MAZZANTI: No further questions.

25 MR. CHHATRE: Ravi Chhatre, NTSB.

1 BY MR. CHHATRE:

2 Q. I'm still a little confused and probably when I read the
3 transcript, it might be clear but I just want to get on the
4 record. All I want to know is on Friday, you had a PG&E person
5 show up. Is that correct?

6 A. Yes.

7 Q. Monday you did some work and the PG&E person was there
8 on Monday also?

9 A. He was there.

10 Q. And you did some work on Tuesday, the PG&E person was
11 also at the scene?

12 A. The first time was on Friday. He come up a couple of
13 minutes and ask me, when you going to pothole the pipe.

14 Q. Okay.

15 A. I told him on Monday.

16 Q. Okay.

17 A. So he was there at 7:30 on Monday, around -- well --

18 Q. Right.

19 A. So he was there. We were starting to expose the pipe
20 and then he left. After we got all the pipe --

21 Q. You pulled the pipe up and he was still there on Monday.

22 A. I don't remember if he was there or not, but you see the
23 time here, I don't know if he gets paid overtime or I don't know,
24 but we was working late because it took a long time to expose the
25 gas main.

1 Q. Okay.

2 A. So we started pulling and then the other problem was the
3 pump.

4 Q. Okay.

5 A. So anyway, so that was on Monday. On Tuesday I called
6 around noon or (indiscernible) but the sewer pipe was all the way
7 to the manhole.

8 Q. I know that. All I'm trying to find out is if PG&E
9 person was at the scene on Friday, on Monday --

10 A. Uh-huh.

11 Q. -- and also on Tuesday.

12 A. He came out on Tuesday when I called him.

13 Q. Okay. But you saw him on Tuesday also?

14 A. Yes.

15 Q. And the job was finished on Tuesday.

16 A. Right.

17 Q. And the paving was done Tuesday.

18 A. Uh-huh.

19 MR. GOODMAN: Are you asking if the paving was done on
20 Tuesday?

21 MR. ORNELAS: No, not the paving. No paving, no.

22 BY MR. CHHATRE:

23 Q. That's fine.

24 A. We backfill, but not the paving.

25 Q. Okay. That's fine. So you seen him Friday, Monday and

1 Tuesday.

2 A. Uh-huh.

3 Q. You saw the PG&E person at the scene?

4 A. Right.

5 Q. And --

6 MS. JACKSON: Connie Jackson. And it was the same
7 person that you saw for the whole time.

8 MR. ORNELAS: Same person, Mr. Steven.

9 MR. CHHATRE: I have no more questions.

10 MR. CALDWELL: Geoff Caldwell, City of San Bruno. Just
11 one quick question.

12 BY MR. CALDWELL:

13 Q. Are you the one that's writing all these notes in the
14 log or is it a variety of different people? I missed that
15 earlier.

16 A. Some is Joe Harty and some is mine but I've got mine
17 here. So it's (indiscernible).

18 Q. Yeah. So are you talking about, there's a group of
19 pages together from Thursday, the 5th through Friday the 13th that
20 are together. Okay. So why don't you -- I don't want to testify.
21 You tell me. Are all of those -- look at those. Are all of those
22 your logs?

23 A. Yeah, it's all mine.

24 Q. Okay.

25 MR. GOODMAN: The one log page that has USA call was

1 from John Harty's because he made the USA call. We were asked to
2 produce that.

3 MR. CALDWELL: That clarifies quite a bit. Thank you
4 very much. No further questions.

5 MR. DAUBIN: Brian Daubin, PG&E.

6 BY MR. DAUBIN:

7 Q. I'm having some -- I'm still unclear about the timeline
8 a little bit, Jose. So I apologize for being redundant but can we
9 go over the timeline again. You're saying that you contacted PG&E
10 on Friday, the 6th, June 6th. Is that correct?

11 A. He come out to the site.

12 Q. Okay. So there was no contact.

13 A. No.

14 Q. He just showed up at the job site.

15 A. He just showed up.

16 Q. Oh, okay. Okay. And then on Monday, you said that you
17 showed -- he was there, due to that conversation that you had on
18 Friday --

19 A. Right.

20 Q. -- he showed up on Monday at 7:30 which is when you
21 started as well.

22 A. Right.

23 Q. Okay. And so my understanding is that when you started
24 on Monday, no excavation for the potholing or the excavation pit
25 for the manhole had started yet. Is that correct?

1 A. On Monday.

2 Q. It started on Monday in the morning.

3 A. Right, it started on Monday.

4 Q. And then you started pipe bursting at 11:00 a.m.,
5 correct?

6 A. Right.

7 Q. How many -- you had mentioned that there was -- you were
8 doing the digging at the same time in two different locations?

9 A. Right.

10 Q. How many men were, man or woman, were working in the
11 potholing area?

12 A. Two guys, hand tools.

13 Q. Two guys by hand.

14 A. Right.

15 Q. Okay. So is it safe to say that you guys, based on the
16 dimensions that you provided, that two men moved 30 yards of dirt
17 in 4 hours? Does that sound reasonable?

18 A. It's possible.

19 Q. Okay. It's possible.

20 A. It's possible because like I tell you, after we burst
21 the pipe, we got the backhoe, so it wouldn't take so long. We put
22 it right in the backhoe, and the guys they don't have to throw all
23 the way to the top.

24 Q. Right.

25 A. Just put it on the bucket and the bucket would just put

1 them --

2 Q. Right.

3 A. -- on the surface.

4 Q. Understood. They used the bucket to move the dirt from
5 the hole to a spoil pile or even a truck?

6 A. Right.

7 Q. But they still hand dug that section of pipe, right?

8 A. Uh-huh.

9 Q. Okay. You covered that one. Had you done this type of
10 pipe bursting before where you went under a utility, either a gas
11 main or water main?

12 A. We cross a lot of water mains.

13 Q. A lot of water mains.

14 A. A lot of water mains, a lot of gas mains. None we don't
15 have any problems.

16 Q. No, no, understood. But you have crossed under gas
17 mains?

18 A. Oh, yeah.

19 Q. And were those PG&E gas mains?

20 A. A lot, yeah.

21 Q. Okay. And at any time has it been a standard practice
22 to put any type of material, excluding sand or gravel, between the
23 pipe and -- between the sewer pipe that you are installing and the
24 PG&E gas main?

25 A. I don't remember. I don't remember what it is but I can

1 tell you exactly. We use sand or (indiscernible).

2 Q. Okay. So this is the first time that you've ever placed
3 wood as you stated --

4 A. Right.

5 Q. -- between your sewer pipe and the gas main.

6 A. And the gas main.

7 Q. Okay.

8 UNIDENTIFIED SPEAKER: Had you done that before on
9 another project?

10 MR. ORNELAS: No, we don't do it before we crossed gas
11 mains.

12 UNIDENTIFIED SPEAKER: Had you used wood?

13 MR. ORNELAS: No, no.

14 UNIDENTIFIED SPEAKER: Okay.

15 MR. DAUBIN: Thank you.

16 BY MR. DAUBIN:

17 Q. Who makes the decisions about placement of the winch and
18 pulleys and braces and sheet piles?

19 A. Well, we use that all the time. We use it for many
20 years.

21 Q. Kind of standard practice.

22 A. Right.

23 Q. Yeah.

24 A. Yeah, we have it there ready when we need it.

25 Q. Okay. So that would be you the foreman or was it the

1 individual setting up the winch?

2 A. No, I am.

3 Q. Oh, you. Okay. So you make those decisions?

4 A. Right.

5 Q. Okay. And what qualifications do you have to determine
6 where that bracing should reside or forces associated with the
7 winch, the braces, the cable? Are you qualified to deal with
8 that?

9 A. Right, yes, we are qualified. We are qualified for
10 that.

11 Q. And what are those qualifications?

12 A. That was for TT Technology.

13 Q. TT Technology.

14 A. Right.

15 Q. And is that a course specifically --

16 A. That's the guys that build all the winch and they teach,
17 you know.

18 Q. Just for clarify, that's the documentation that was
19 provided in the packet?

20 MR. GOODMAN: Correct. I think we just gave you the --
21 I think there were actually a number of them. That was the most
22 recent certification letter before this work.

23 MR. DAUBIN: Got it.

24 MR. GOODMAN: I think there had been earlier ones
25 earlier years.

1 MR. DAUBIN: Thank you.

2 BY MR. DAUBIN:

3 Q. And in that course work, do they talk about going under
4 high risk utilities or gas mains, those types of things?

5 A. It's hard to remember. It's about 18 years ago.

6 Q. Oh, okay.

7 A. I don't remember but we know, you know, we got to
8 pothole it to cross because, you know, we always sometimes 10, 15
9 feet deep.

10 Q. Right.

11 A. Unless it's a big (indiscernible).

12 MR. CHHATRE: Off the record.

13 (Off the record.)

14 (On the record.)

15 MR. CHHATRE: Back on the record.

16 BY MR. DAUBIN:

17 Q. To be more clear, Jose, and taking the suggestions of
18 both individuals who had comments earlier off the record, I had
19 asked you about high risk utilities, and I want to be more clear.
20 Did that training specifically cover high pressure transmission
21 gas mains and going under high pressure gas mains? That was
22 really my question.

23 A. Okay. Like I answered, it was 18 years ago. I don't
24 remember. I don't have any paperwork (indiscernible). So all it
25 says is okay, you're certified from this time, you can do the work

1 but I don't really have any record for that.

2 Q. Thank you.

3 MR. CHHATRE: Off the record.

4 (Off the record.)

5 (On the record.)

6 MR. CHHATRE: Back on the record.

7 BY MR. DAUBIN:

8 Q. And so during that -- you had mentioned that the
9 certification course you took 18 years ago. Are there refresher
10 courses that are offered or that you have taken part in during
11 that time?

12 A. No.

13 Q. Okay. You had mentioned that there was the need to
14 remove sand from the pit and you had stated that the sand was, you
15 had assumed was bedding of the original clay pipe.

16 A. Correct.

17 Q. Can you offer any idea? Does that make your pull go
18 faster, slower?

19 A. Slow.

20 Q. It makes -- the sand --

21 A. Slower.

22 Q. And what is the reason that it would cause it to go
23 longer than expected?

24 A. The sand, after front part of the pipe, the vibration,
25 you know, it's like air hammer.

1 Q. Right.

2 A. The vibration. So the clay pipe, it got 6 inches around
3 sand. So the hammer is going to break the old clay. Sometimes
4 it's too long. So the sand is going to stay there or just go to
5 the side.

6 Q. Uh-huh.

7 A. But after expander, we call the expander, the front
8 part, it's crushing the pipe and the compactor, plus all the
9 people flushing or just the water, the sand has turned like
10 slurry. So they crush the pipe and make a little bit slow. But I
11 mean it never going to stop because it's too much power. So
12 that's the (indiscernible).

13 Q. So is it safe to say that the pull took a little longer
14 than expected because of all that sand?

15 A. Because of all the sand.

16 Q. Thank you. And then clarity again for, we had talked
17 originally, there was some questions about water, ground water in
18 the excavation pits, and you had said, and made mention on our
19 drawings that there was a 4 inch pump specifically for the
20 sewer --

21 A. Right.

22 Q. -- that was accumulating in the manhole up Earl.

23 A. Right.

24 Q. And you said there was a 2 inch pump in the excavation
25 hole at the intersection of Glenvue and Earl.

1 A. Right.

2 Q. What was the 2 inch pump for? Was that for sewer water
3 or was that --

4 A. Sewer water.

5 Q. -- for ground water?

6 A. Sewer water.

7 Q. Okay. It's the sewer water that's coming off the
8 laterals that are no longer connected.

9 A. Right, from the houses.

10 Q. Okay.

11 A. We have 10 houses or probably have more than 10 houses
12 between the pump and the winch. So all the people using the
13 water.

14 Q. Understood.

15 A. So the work is so hard. So we used a pump and pump into
16 the manhole.

17 Q. Okay. So at any time when the excavation started around
18 the gas main, was there any water associated with that or did you
19 have any issues with water in getting that dirt out into the
20 bucket of the backhoe and then out into a spoil pile?

21 A. No.

22 Q. Okay. Thank you. No more questions.

23 MR. FASSETT: Bob Fassett, PG&E, just a couple, just to
24 clarify.

25 I think, counsel, you clarified earlier that the model

1 of breaker was a Hercules.

2 MR. GOODMAN: Yes, I think John Harty had said on
3 Monday, he was asked the manufacturer and said Hercules and when
4 asked the model, he said he didn't know. We have since gone back
5 and gotten some documentation which I provided which shows that
6 the model was actually Hercules.

7 MR. FASSETT: Okay.

8 BY MR. FASSETT:

9 Q. And to clarify, what's the outside diameter, to Jose,
10 what was the outside diameter of the pipe you pulled into the
11 hole? I think I heard 10.

12 A. I think about 10 1/2.

13 Q. 10 1/2. And I'm asking that question just because I
14 want to confirm, for the Hercules, it says that the tool diameter
15 is 8 1/2 inches, the rear flare is 9.2 inches in diameter. So the
16 pipe you pulled back in is a little bigger than the biggest end --

17 A. The hammer go inside the pipe.

18 Q. Okay. What was the -- maybe we -- I don't see any --
19 what was the dimensions of the hole over the manhole? It looks
20 like one dimension is 8 feet, but what's the --

21 A. 10.

22 Q. 10, 8 x 10. And was that centered over the manhole?

23 A. No, it's to east side.

24 Q. I'm sorry.

25 A. You said --

1 Q. Was the manhole in the center of the 8 x 10?

2 A. It was in the center, right. It was in the center.

3 MS. FABRY: Klara Fabry. Just a correction. Just a
4 second ago, you started to say that it wasn't -- the cement wasn't
5 in the center of the hole. I just want to make sure that you are
6 confirming that the manhole was in the center of the hole that you
7 remember, and that it was not more to either side.

8 MR. ORNELAS: This case it's hard to know.

9 BY MR. FASSETT:

10 Q. Well, relative to that picture on the board, if you
11 don't mind, give me some sense.

12 A. This is the manhole, okay.

13 Q. That's the shoring, right?

14 A. Yeah. This is the top. It depends on the manhole.
15 Sometimes the manhole has got an angle.

16 Q. Yeah, I know. But --

17 A. Sometimes it's a straight hole. I mean it's goes this
18 way. Sometimes it goes this way. The manhole is here. Part of
19 the angle is going to have this way. So pretty much -- I mean the
20 view at the bottom is pretty much the same.

21 Q. Right.

22 A. It's 8 x 10.

23 Q. This is Bob Fassett. So the manhole I'm asking about is
24 the base of the manhole.

25 A. The base of the manhole.

1 Q. Is that about in the center of the box?

2 A. Yes.

3 Q. Okay. Thank you. That's it. Thank you.

4 A. You're welcome.

5 MS. JACKSON: I'm sorry. No questions.

6 MS. FABRY: Klara Fabry.

7 BY MS. FABRY:

8 Q. Jose, do you have any knowledge or you had any knowledge
9 at that time, Friday, Monday, or Tuesday, when the PG&E inspector
10 was on the job, what discussion John Harty had with the inspector
11 during that time? You were involved in those discussions as a
12 third party or you have any knowledge of what discussion John had
13 within those days with the inspector, PG&E inspector?

14 A. No, I don't.

15 Q. Okay.

16 MR. SHORI: Sunil Shori, California PUC. Just two quick
17 questions.

18 BY MR. SHORI:

19 Q. Were there any bends by the time you got done with your
20 installation on this line? So basically if we were to look at the
21 manhole after you left, was it a straight shot back to the manhole
22 west on Earl or were there any bends or --

23 A. No, straight.

24 Q. -- any transitions or anything in it?

25 A. No.

1 MR. SHORI: And just for confirmation, this is the log
2 that we're indicating that is not Jose's in terms of --

3 UNIDENTIFIED SPEAKER: The one that's not stapled.

4 MR. GOODMAN: That's correct. That's the single page
5 between two green sheets.

6 MR. SHORI: And so this is from Mr. Harty then?

7 MR. GOODMAN: Correct because we were asked to produce
8 the USA ticket. That has the number on it which is why we
9 produced it. So that reflects the call that he made, not Jose,
10 but John Harty made, and the USA number.

11 MR. SHORI: So as far as any conversations back or any
12 calls back to him, from PG&E, we would have get from him because I
13 don't see anything here. So --

14 MR. GOODMAN: Correct.

15 BY MR. SHORI:

16 Q. Jose, had you been asked to put wood or any other
17 separators between work that you had done in the past and somebody
18 else's facility other than backfill?

19 A. No.

20 Q. Thank you.

21 MR. GUNTHER: No questions.

22 MS. MAZZANTI: No questions.

23 MR. SPERRY: No questions.

24 MR. NICHOLSON: No questions.

25 MR. CHHATRE: Ravi Chhatre. One question.

1 BY MR. CHHATRE:

2 Q. Did PG&E inspector present on those three days, Friday,
3 Monday, Tuesday, was he present on Wednesday?

4 A. No.

5 Q. During his presence, did he ever express any
6 displeasure, disappointment, that you did the backfill without him
7 being present?

8 A. No.

9 MR. CHHATRE: That's all for me.

10 MR. NARVELL: No questions.

11 MR. CHHATRE: Any more?

12 MR. DAUBIN: Brian Daubin, PG&E.

13 BY MR. DAUBIN:

14 Q. Did you ever contact Mr. Poulo, Mr. Steve Poulo?

15 A. Yes.

16 Q. You contacted him --

17 A. Yes.

18 Q. -- directly?

19 A. Yes.

20 Q. How many times was that?

21 A. One.

22 Q. One time.

23 A. Right.

24 Q. Do you remember what day that was?

25 A. Tuesday.

1 Q. On Tuesday. And what was the intent of that contact?

2 A. To look at the separation, the main, the sewer main on
3 the bottom there, the 30 inch gas line.

4 Q. And so Tuesday was, Tuesday was the pull and when you
5 completed the --

6 A. Monday was the pull.

7 Q. Monday was the pull. Okay. But you called him Tuesday
8 to view the clearance between --

9 A. Right.

10 Q. -- the sewer line and the gas main?

11 A. Right.

12 Q. Okay. Was Mr. Poulo on site for the pull on Monday?

13 A. He was, but I don't know what time he left.

14 Q. Okay. Did he view the pull as it went underneath the
15 gas line?

16 A. No.

17 Q. And at any time had he requested to be there at the time
18 that you were working near the gas main?

19 A. No.

20 Q. And was he there for the entire duration as long as it
21 took those four hours to hand dig the transmission main, the
22 pothole around it?

23 A. I don't really remember but I know we start digging, he
24 saw the pipe, and we had (indiscernible) more, and then after that
25 I don't remember if he was still there or seeing his truck or --

1 but I know he was there.

2 Q. But he was there that day but you're not sure if he was
3 there for the entire duration of it.

4 A. Right.

5 Q. Okay. And was there ever any discussion about the need
6 to pothole on both sides of the gas main?

7 A. We pothole on both sides.

8 Q. You potholed on your own judgment, you made the decision
9 to pothole on both sides of the gas main?

10 A. He never tell me because that's the only way to find
11 out.

12 Q. Okay.

13 MR. DAUBIN: I don't have any further questions.

14 BY MR. FASSETT:

15 Q. Did -- this is Bob Fassett. Did Mr. Steve Poulo see you
16 pothole both sides of the transmission or just one side?

17 A. Both sides.

18 Q. Thank you.

19 MS. JACKSON: No questions.

20 MR. CHHATRE: Any more questions?

21 MS. FABRY: I have one. Klara Fabry.

22 BY MS. FABRY:

23 Q. Steve asked you specifically to add a 2 x 4 or whatever
24 wood on top of the sewer?

25 A. He told me to put something between.

1 Q. Thank you.

2 MS. FABRY: No more questions.

3 MR. CHHATRE: Any other questions?

4 If not, thank you so much for spending such a long time
5 with us. Off the record.

6 (Whereupon, the interview was concluded.)

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CERTIFICATE

This is to certify that the attached proceeding before the
NATIONAL TRANSPORTATION SAFETY BOARD

IN THE MATTER OF: PACIFIC GAS & ELECTRIC COMPANY
 SEPTEMBER 9, 2010 ACCIDENT
 SAN BRUNO, CALIFORNIA
 Interview of Jose Ornelas

DOCKET NUMBER: DCA-10-MP-008

PLACE: Burlingame, California

DATE: January 6, 2011

was held according to the record, and that this is the original,
complete, true and accurate transcript which has been compared to
the recording accomplished at the hearing.

Kathryn A. Mirfin
Transcriber