



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
FISH AND WILDLIFE SERVICE
BUREAU OF RECLAMATION



ELECTRONIC SUBMISSION

February 25, 2011

Ms. Yvonne Meeks
Manager – Environmental Remediation
Pacific Gas and Electric Company
4325 South Higuera Street
San Luis Obispo, CA 93401

Dear Ms. Meeks:

Subject: PG&E Topock Compressor Station Remediation Site – Technical Memorandum entitled *Final Revised Implementation Plan for Repair of Monitoring Wells MW-38S and MW-38D and Old Well/Pipe Reconnaissance, PG&E Topock Compressor Station, Needles, California.*

The Department of the Interior, on behalf of itself and the Bureau of Land Management (BLM), the U.S. Fish and Wildlife Service, and the Bureau of Reclamation (collectively referred to as “DOI”) are in receipt of the Technical Memorandum entitled *Final Revised Implementation Plan for Repair of Monitoring Wells MW-38S and MW-38D and Old Well/Pipe Reconnaissance., PG&E Topock Compressor Station, Needles, California* dated February 11, 2011. DOI is in agreement with all revisions to the technical memorandum and thereby approves the document for implementation.

BLM initiated Section 106 consultation with the nine Native American Tribes regarding this proposed action via certified letters dated 9/16/10 regarding this proposed activities specified in the work plan. The BLM determination of effect/ recommendation letter was sent out to the California State Historic Preservation Office on October 20, 2010. The California State Historic Preservation Office concurred with BLM’s determination in writing on January 28, 2011. The concurrence letter is attached for your reference. PG&E shall adhere to the conditions specified below in implementing the approved plan.

The conditions stipulated are as follows: (1) The project area is included within the area considered to be the Topock Traditional Cultural Property (TCP); therefore, PG&E shall avoid or

Ms. Yvonne Meeks

Page 2


mitigate adverse audio and visual effects to the maximum extent practicable; (2) Surface geophysical surveys for the location(s) of buried well pipes need to be conducted to narrow the search to a few sites where further investigations may be performed; (3) Tribal monitors should be invited to be present for all intrusive digging near the Topock Maze; (4) The tribes, in coordination with DOI and DTSC will have an opportunity to review the results of the initial exploration for the "Utility Survey and Surface Geophysical Evaluation" when they become available; and, (5) With respect to MW-38 well abandonment, repair, or replacement activities, the tribal monitors should be invited to observe the field work in order to better understand what may be expected in related future actions.

Specific stipulations provided in the Programmatic Agreement that are applicable to the work plan shall also be adhered to by PG&E. These stipulations are as follows:

- New facilities or activities will be placed in areas already disturbed by previous grading and other mechanized activities to the extent practicable, consistent with protecting human health and the environment and achieving cleanup in a timely manner.
- The performance of all field activities in support of the remedy shall be executed in such a way as to avoid and/or minimize adverse effects to cultural and historic properties to the maximum extent practicable.
- Tribal and Archaeological Monitors shall be authorized to monitor all characterization, remediation and mitigation activities in accordance with Appendix C of the Programmatic Agreement.

If you have any question, please contact me at (303) 445-2502.

Sincerely,



Pamela S. Innis
DOI Topock Remedial Project Manager

cc: Cathy Wolff-White – BLM
Carrie Marr – USFWS
Jeff Smith – BOR
Aaron Yue – DTSC
Karen Baker – DTSC
Chris Guerre – DTSC
PG&E Topock Consultative Workgroup (CWG) Members

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



January 28, 2011

Dr. Ramone B. McCoy
Bureau of Land Management
2610 Sweetwater Avenue
Lake Havasu, AZ 86406

RE: MW-38S and MW-38D Well Repair-Topock Remediation Project; 8100 (AZCO30):
BLM101117A

Dear Dr. McCoy:

Thank you for requesting my comments on the above cited undertaking. My staff has reviewed the documentation you provided including the additional information we requested regarding tribal consultation and I would like to offer the following comments.

The proposed undertaking is a reconnaissance effort to relocate well pipes through non-invasive surface geophysical detection methods and invasive methods as necessary. The least invasive methods should be used whenever possible. You have concluded that the undertaking will have an effect on known historic properties however with conditions that effect would not be adverse. Depending on the extent and duration of the invasive methods proposed, a reconsideration of this determination may be warranted. I do not object to your determination of effect with conditions. For future well closures, I recommend that BLM continue to explore acceptable alternative means for closing out the wells that are no longer needed other than cement grout. Once again, I encourage initiating the development of the Cultural and Historic Properties Management Plan to guide all future actions associated with this Undertaking.

Thank you for requesting my comments. If you have any questions, please contact Dwight Dutschke or Susan Stratton at 916-445-7000.

Sincerely,

A handwritten signature in cursive script that reads "Susan K. Stratton for".

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer