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July 3, 2007

Mr. Aaron Yue Project Manager California Department of Toxic Substances Control 5796 Corporate Avenue Cypress, CA 90630

Subject: Well PGE-6 Decommissioning Summary

PG&E Topock Compressor Station, Needles, California

Dear Mr. Yue:

This letter transmits the *Well PGE-6 Decommissioning Summary*, documenting the activities performed to implement the *Well PGE-6 Revised Decommissioning Work Plan* approved by DTSC on March 28, 2007.

If you have questions, please do not hesitate to contact me. I can be reached at (805) 234-2247.

Sincerely,

cc: Chris Guerre/DTSC

John Earle/HNWR

Cathy Wolff-White/BLM

Geonne Meeks

Marvin Cerdanio/San Bernardino County

### Well PGE-6 Decommissioning Summary

PREPARED FOR: Pacific Gas and Electric Company

PREPARED BY: CH2M HILL

DATE: July 3, 2007

#### Introduction

Pacific Gas and Electric Company (PG&E) is addressing chromium in groundwater at the Topock Compressor Station near Needles, California, under the oversight of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and the Untied States Department of the Interior.

This technical memorandum summarizes the field activities conducted during decommissioning of well PGE-6 at the PG&E Topock site. PGE-6 was originally installed as a standby industrial water supply well in 1964, and is located on the Havasu National Wildlife Refuge (HNWR) approximately 200 feet north of the PG&E Topock Compressor Station property line. Decommissioning of PGE-6 was performed in April and May 2007, following procedures outlined in the *Well PGE-6 Revised Decommissioning Work Plan*, dated November 10, 2006 (CH2M HILL, 2006).

The PGE-6 decommissioning activities were executed in accordance with DTSC's approval letter dated March 28, 2007 (DTSC 2007), and HNWR's approval letter dated March 14, 2007 (USFWS 2007).

Figure 1 shows a schematic diagram of well PGE-6 prior to decommissioning activities. Figure 2 is a schematic diagram of PGE-6 upon completion of decommissioning activities. Attachment 1 contains photos of well decommissioning activities. Attachment 2 contains driller report submitted to the California Department of Water Resources and Attachment 3 is the San Bernardino County Department of Public Health, Division of Environmental Health Services (DEHS) well permit.

### **PGE-6 Decommissioning**

Decommissioning of well PGE-6 occurred in two phases. It was necessary to conduct the decommissioning work in this manner after discovering that no seal was present between the inner casing and conductor casing at approximately 4 feet below ground surface (bgs) during the second day of decommissioning work. DTSC's conditional approval letter (DTSC, 2007) required that PG&E attempt removal of the 20-inch-diameter conductor casing if a seal did not exist inside or outside of the casings. The 1964 driller's construction record indicated that a seal was present inside the conductor casing. As a result, the first crew onsite did not come prepared to attempt removal of the conductor casing.

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#### Well Decommissioning Phase One

The first phase of decommissioning work occurred during the week of April 2, 2007. Work included removing the pump from the well, conducting a well bore video (Attachment 4), attempting to bail sediment from the well, placing a bentonite seal near the bottom of the well screen, perforating the well screen and casing, and pressure-grouting. Grouting during this step was terminated at 33 feet bgs to allow for upcoming removal of the conductor casing.

Details of activities conducted during the first phase of decommissioning (April 2 through April 6, 2007) include:

- On April 2, a well bore video was conducted at PGE-6 (Attachment 4) that showed the well to be filled with sediment and scale to a depth of 161 feet bgs. Consistent with the 1998 video log, the new video showed the well casing to be in very poor condition. Numerous holes were visible in the casing between about 50 and 90 feet bgs, with heavy scaling above the water table (depth to water 106 feet bgs). Heavy corrosion and encrustation of the screen interval was prevalent, such that no screen slots were visible within the screened interval of the well.
- On April 3 and 4, approximately 2 feet of sediment were bailed from the well, deepening the well to 163 feet bgs. Sediment bailed from the well consisted primarily of large pieces of scale from the casing up to 1 inch in diameter. Comparison of the volume of material bailed from the well with the observed decrease in sediment level in the well indicated that the bailing process was producing further collapse of the casing walls rather than reaching the objective of bailing out the sediment and scale already present at the bottom of the well.
- On April 4, approval to stop bailing was received via a phone call with DTSC. Progress removing the larger pieces of casing from the bottom of the well was slow, and there were concerns of further compromising the strength of the already weak casing to the point of collapse. Bentonite chips/pellets were added to seal the bottom of the well from 163 to 154 feet bgs. The well screen was perforated with a mills knife from approximately 140 to 126 feet bgs. Four 1-foot-long vertical cuts, approximately 2 inches wide, were made in the casing at 90 degrees to each other over this entire interval.
- On April 4, the San Bernardino County Department of Public Health was informed that grouting would be occurring the next day. The County declined to come to the site to oversee grouting.
- On April 5, the well was pressure-grouted with a submerged 2-inch tremmie pipe from 154 feet to 79 feet bgs. On April 6, the well was pressure-grouted with a submerged 2-inch tremmie pipe from 79 feet to 33 feet bgs.
- Approximately 1,200 gallons of grout were added to the well. The calculated volume necessary to fill the well without loss to the formation was approximately 970 gallons.
- A steel plate was welded to the top of the casing to secure the well until phase two of well abandonment.

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#### Well Decommissioning Phase Two

On April 19, 2007, alternative options for removal of the 20-inch conductor casing were discussed with DTSC. It was considered unlikely that the 20-inch casing could be pulled from the ground due to the thin wall construction, the corrosion likely to be present due to the age of the well, and the partial cementing between the inner and outer casing. In addition, an attempt to pull the outer casing would require mobilization of a very large drilling rig that would likely not be able to negotiate the steep, narrow access road to access the well. In an email to DTSC on April 30, 2007, PG&E requested approval for perforating the inner casing and then pressure-grouting through the perforated inner casing as an alternative to removal of the outer casing. The objective of the pressure-grouting procedures was to produce a seal between the inner casing and conductor casing without attempting risky alternatives of over drilling or using hydraulic jacks to attempt removal of the conductor casing. Approval of these modified field procedures to complete decommissioning of well PGE-6 were granted in an email from DTSC on May 1, 2007.

The following activities were performed during the second phase of well decommissioning, which occurred May 3 through 5, 2007:

- The 14-inch well casing was perforated from the top of the grout plug at 33 feet bgs to approximately 9 feet bgs with a mills knife, making five cuts per lineal foot 1.5 inches long by 0.375 inches wide.
- The 3-foot concrete block around the wellhead was removed.
- Grout (Type V Portland cement with 3% bentonite) was emplaced in the perforated section of well casing via positive pressure tremmie. A total of 230 gallons of grout was added from 33 to 9 feet bgs.
- A trench was cut to approximately 6 feet bgs around the well using an air knife.
- The 14-inch casing was cut off at approximately 5 feet bgs.
- The 20-inch conductor casing was cut from the outside at about approximately 5 feet bgs. An additional 120 gallons of grout were added to fill the remaining portion of the 14-inch well casing and complete the "mushroom cap" over the top of the cut off well casings.
- The excavation above the "mushroom cap" was filled with native soil removed from around the well.

No soil was removed from the work area; soil excavated from around the casings to facilitate surface casing removal at 5 feet bgs was added back to the excavation and the ground surface was returned to grade. The last photograph in Attachment 1 illustrates the final condition of the worksite upon completion of decommissioning activities.

### **Waste Management**

Investigation-derived waste materials generated during well decommissioning included incidental trash, scale and formation materials bailed from the well, two 5-foot sections of steel casing cut from the top of the well, and approximately 300 gallons of groundwater. The

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groundwater was transported to the Interim Measures No. 3 treatment facility at the Topock site. Bailed sediment (mostly scale from the well casing) was taken to the Interim Measures No. 3 treatment facility and separated from water in a phase separator. Sediment/scale was then transported to an offsite hazardous waste disposal facility since it had been in contact with hexavalent chromium contaminated groundwater. The 5-foot sections of well casing were pressure washed to remove potential residual contamination and recycled as scrap metal.

### Certification

This memorandum was prepared by CH2M HILL under the supervision of the professional whose seal and signature appears hereon, in accordance with currently accepted professional practices; no warranty, expressed or implied, is made.

Paul F. Bertucci

Certified Engineering Geologist

### References

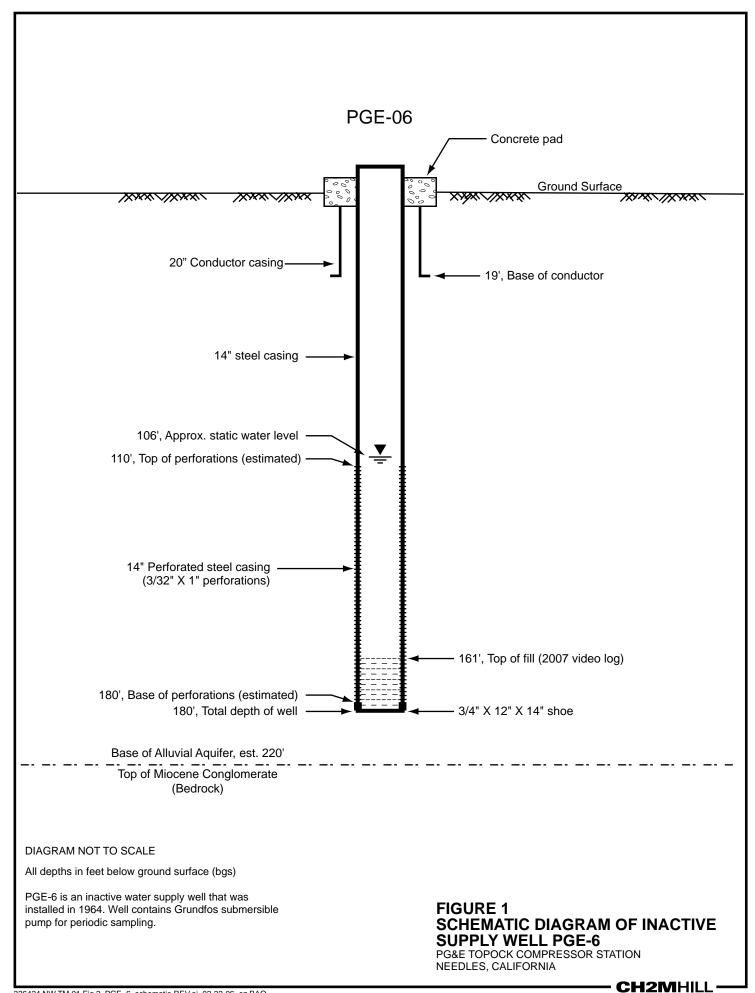
California Department of Toxic Substances Control (DTSC). 2007. Letter to PG&E. "Conditional Approval of Well PGE-6 Decommissioning Workplan, Pacific Gas and Electric Company, Topock Compressor Station, Needles, California." March 28.

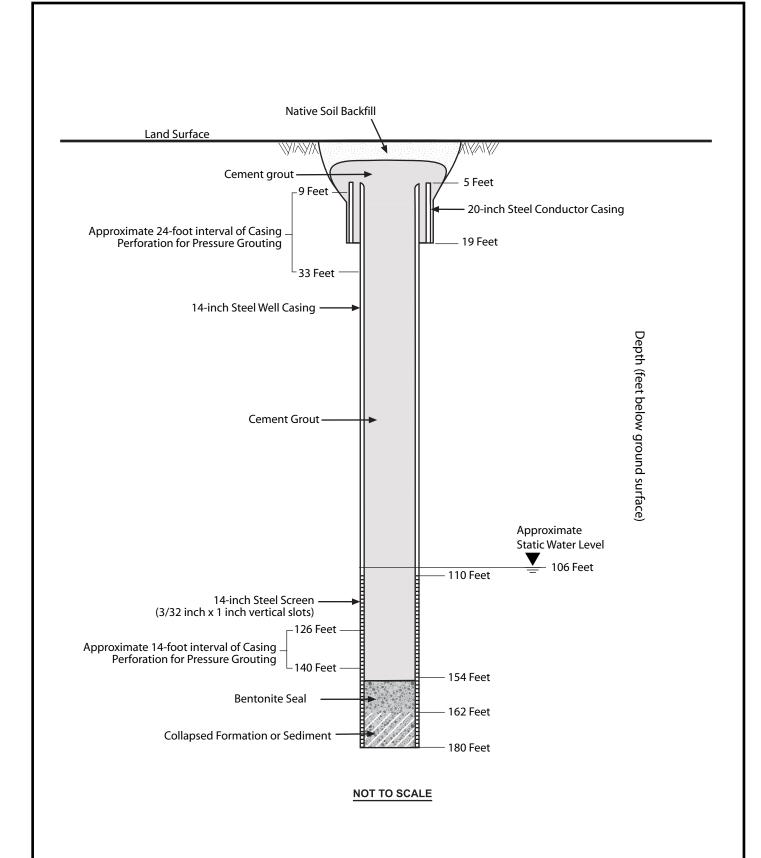
CH2M HILL. 2006. Revised Well PGE-6 Decommissioning Work Plan, PG&E Topock Compressor Station. November 10.

United States Fish and Wildlife Service, Havasu National Wildlife Refuge (USFWS). 2007. Letter to PG&E authorizing, with special conditions, PG&E's request as outlined in the In Situ Hexavalent Chromium Reduction Pilot Test Work Plan – Upland Plume Treatment. March 14.

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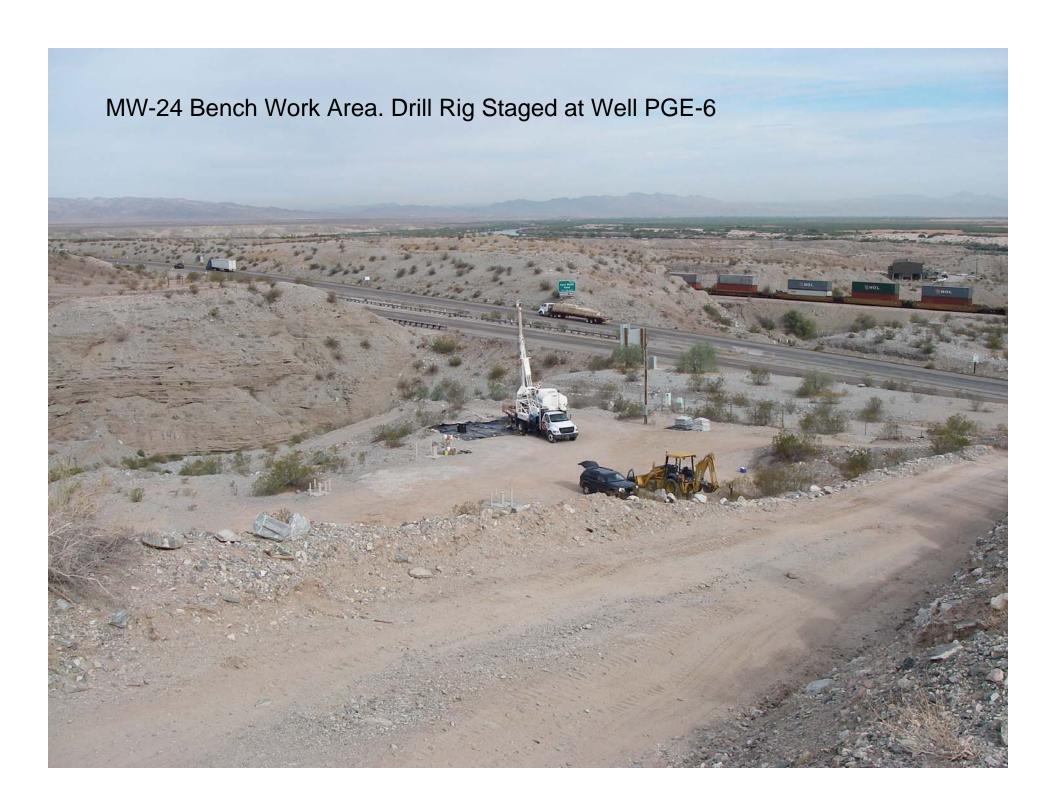
Revised 6/19/07

FIGURE 2 SCHEMATIC DIAGRAM OF PGE-6 DECOMMISSIONING

PG&E TOPOCK COMPRESSOR STATION NEEDLES, CALIFORNIA

CH2MHILL

Attachment 1 Photos



# Well PGE-6 Well Screen and Casing Perforating Phase One



# Mixing Grout Phase One

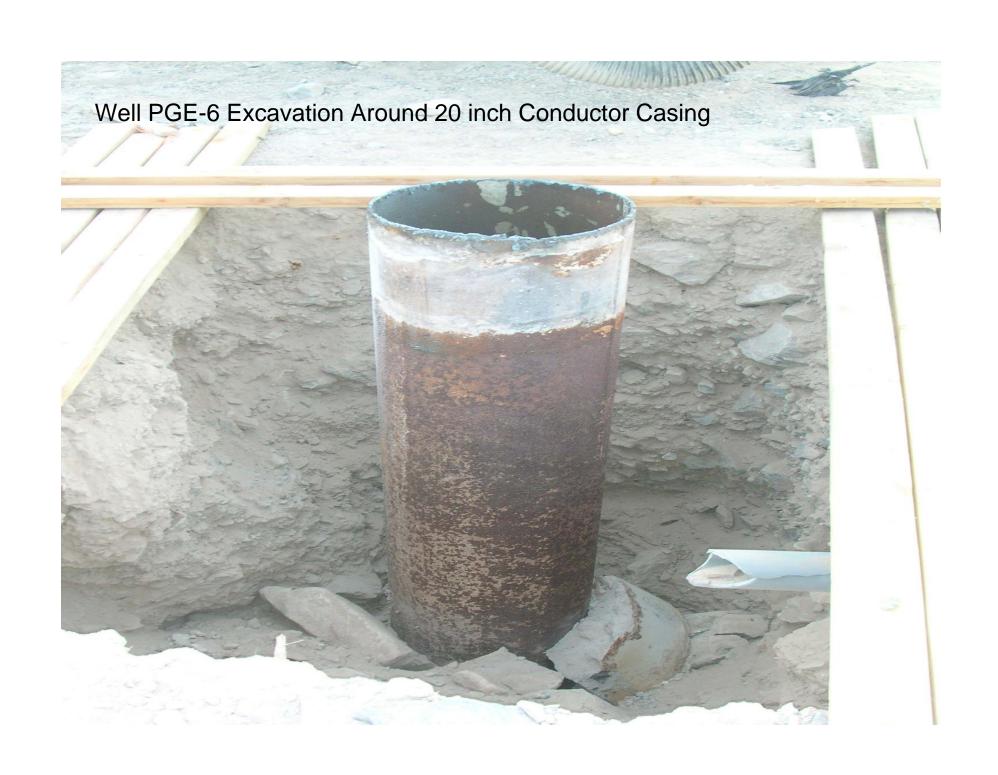


# Mixing Grout Phase One



# Air Knifing Around Conductor Casing





Cutting and Removing 20" Conductor Casing



Adding the "mushroom cap"



PGE-6 Site Upon Completion of Well Abandonment



Attachment 2 Driller Reports

File with DWR WELL COMPLETION REPORT						
WEEL COMITEDITOR REPORT	STATE	WELL NO /S	TATION NO.			
rage or	I 1 I 1					
Owner's Well No. PGE-6 No.  e056639    Date Work Began 5/3/07	Ven No.					
Local Permit Agency San Bernardino County Department of Public Health	Work Began 5/3/07 , Ended 5/4/07 , E					
Permit No Permit Date		APN/TRS/OT	HER			
GEOLOGIC LOC	WELL OWN	NER -				
ORIENTATION ( ) X VERTICAL HORIZONTAL ANGLE (SPECIFY) Name Pacific Gas & Electi	ric Co.					
PRILLING Air Perf Tool Fluid Mailing Address P.O. Box 3	337					
SURFACE DESCRIPTION Needles	CA					
P. b. Fl. Describe material, grain size, color, etc.	VELL LOCAT	rion	STATE ZIP			
0 3.5' Native soil Address						
3.5' 30' Portland City Topcock Well casing perffed from 5' to 30' in a 180 County San Bernardino						
degree rotation. Backfilled with portland cement  APN Book Page	D					
Township 7N Range	Parc	tion 8				
Township // Range		aon <u> </u>	, WEST			
DEG. MIN. SEC	<b>3</b> .	DE:	G MIN. SEC.			
LOCATION SK NORTH	EICH —		=ACTIVITY (∠)			
		_	ODIF-ATION/REPAIR			
		1	Deepen			
		1_	J , Other (Specify)			
		] ]	X DESTROY (Describe			
		ł	Procedures and Materials Under "GEOLOGIC LOG")			
1 1		P	LANNED USES (エ)			
		ΙĮ	Domestic Public			
5		٤ ا	. trrigation J , Industrial			
wees.		EAST	MONITORING			
		C	TEST WELL			
			HEAT EXCHANGE			
1			DIRECT PUSH 1.			
			VAPOR EXTRACTION			
			SPARGING			
SOUTH	ll form Royale Re	nildinas	REMEDIATION			
Illustrate or Describe Distance of Wel Fences, Ricers, etc. and attach a map. necessary, FLEASE BE ACCURATE	Use additional 1	paper if	OTHER (SPECIFY) J			
WATER LEVEL &			WD WELL			
DEPTH TO FIRST WATER			ED WELL			
DEPTH OF STATIC	(PL) DELLOW	SURFACE				
WATER LEVEL	Ft.) & DATE MEA	SURED				
TOTAL DEITH OF BORING 180' (Freet)	(GPM) & TEST	TYPE				
100'			(Ft.)			
TOTAL DEPTH OF COMPLETED WELL 180 (Feet) *May not be representative of a	well's long-ter	rm yield.				
DEPTH BORE CASING (S) DEPT	TH	ANNUL	AR MATERIAL			
FROM SURFACE HOLE TYPE (=) FROM SU	JRFACE		TYPE			
FI. to Pl. (Inches)	CE		ILL FILTER PACK			
FI. to Pt. 2 5 2 2 1 (Inches) THICKNESS (Inches) Ft. to	Ft. ( <u>~</u>	. 1 1	∠) (TYPE/SIZE)			
	$-\bot$	1-1-1				
<del></del>			_			
ATTACHMENTS (±) CERTIFICATION STAT	EMENT -					
I, the undersigned, certify that this report is complete and accurat	te to the best	of my know	rledge and belief.			
J Geologic Log		-				
Well Construction Diagram  Cascade Drilling, Inc.  (PERSON, FIRM, OR CORPORATION) (TYPED OR PRINTED)						
Geophysical Log(s)  Soll-Matter Chemical Analysis 555 South Harbor Blyd. \ La	a Habra,	C	A 90631			
J. Sol/Water Chemical Analyses   1 333 300 till 11 dttp of 1819 d. \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \						
Soll/Water Chemical Analyses    Soll-Water Chemical Analyses   555 South Harpor Blyd.   La	спу	ST	ATE ZIP			

**Print Form** 

Attachment 3 Well Permit

#### San Bernardino County Department of Public Health DIVISION OF ENVIRONMENTAL HEALTH SERVICES 385 North Arrowhead Avenue, San Bernardino, CA 92415-0160

WP 3740

DO NOT FILL IN  Permit Number	WELL P (Please Boring/We	Print)	Date	13-29-0 733.	7 02/
Pacific Gas and Electric Attn: Glen Riddle  Mailing Address PO Box 337  City Needles, CA Zip PG&E Topock Compressor Site Address off I-40 @ Park Moabi exit  City Needles, CA Zip Telephone Number (760) 326-5516	92363 or Station 92363	Sealing Mate  TW  6. DEPTH OF WE  Proposed  DIAMETER OF  7. CASING INSTA	AL: Seal Owner 20 Iluctor Dia. incl erial ES CMT LL (feet): BORE (in.):	I Depth  ☐ Contract  hes in., Wa , Thickness  Existing 18  14 inches	ft (Gage)
2. WELL DRILLER: Prosonic Business N  4/2/2007 Start Date  3. WELL USE (check):  Community Horizontal Individual Monitoring Agricultural Public Water Supply	4/13/2007 Completion Date  Test Dairy	From (ft.) 0 Gravel Pack:	to k depth	Dia. (in.) 14	Wall (Gage) Steel ft.
4. TYPE OF WORK (check):  New Reconstruction  SECTION MAP - DO NOT FILL IN  MOAB!  REG-10-URL  PARKE	Scale 1 inch - 1/2 mile	10. LOCATION IN (a) TOWN:	S (if applicable): to	352	ft.
I-40 SEC	SE 1/2	(c) Latitude Lat: _ Long: (d) Solid or _ Yes Location  Seal Cap Check Valve	DO NOT FI	56 ', _ 14 ', _ I Site within Tv	26.040 "N/S 15.203 "E/W

**Building & Safety Notified** 

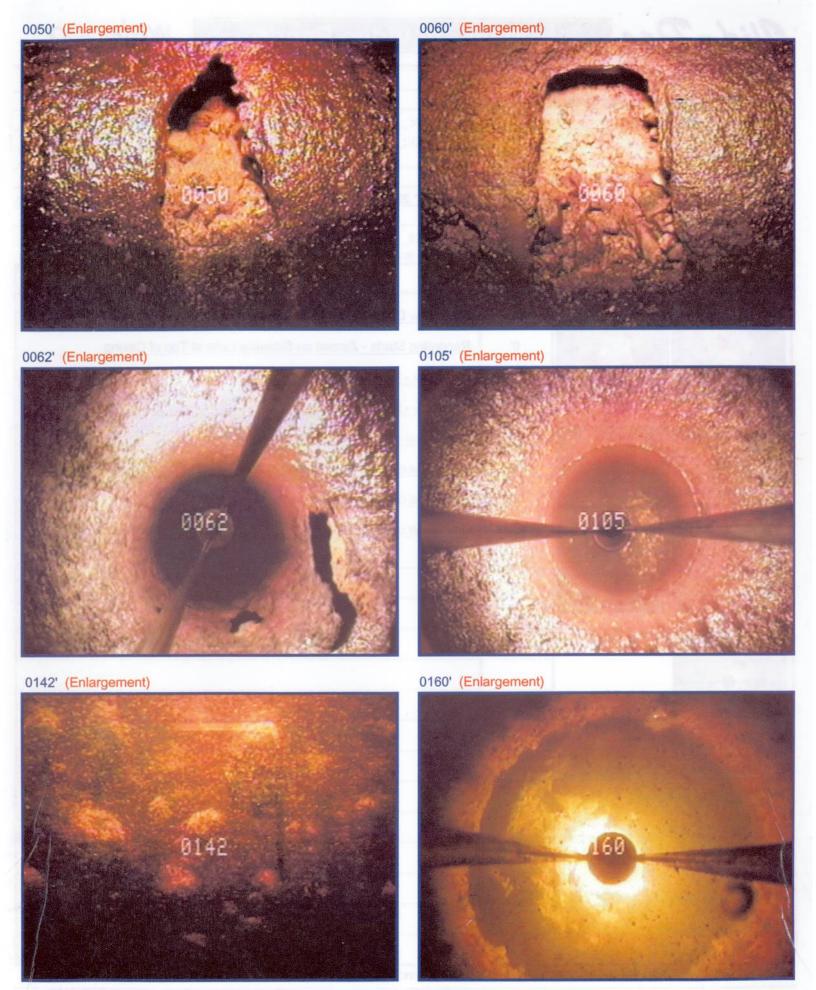
Well ° Site ° C	Indicate the distance, in feet, of any of the following which are within 500 ft. of the well site:  Other  Sewers  Septic tanks  Leaching fields  Seepage pits  Cesspools  E  Lakes and ponds  Watercourses  Animal or fowl kept  See Attached  Location Map
(c)	Sewers Septic tanks Leaching fields Seepage pits Cesspools E Lakes and ponds Watercourses 500 ft Animal or fowl kept  See Attached
(c)	Septic tanks  Leaching fields  Seepage pits  Cesspools  Lakes and ponds  Watercourses 500 ft  Animal or fowl kept
(c)	Septic tanks  Leaching fields  Seepage pits  Cesspools  Lakes and ponds  Watercourses 500 ft  Animal or fowl kept
(c)	Leaching fields  Seepage pits  Cesspools  E Lakes and ponds  Watercourses 500 ft  Animal or fowl kept  See Attached
(c)	Seepage pits  Cesspools  E Lakes and ponds  Watercourses 500 ft  Animal or fowl kept  See Attached
(c)	Cesspools  Lakes and ponds  Watercourses 500 ft  Animal or fowl kept  See Attached
(c)	E Lakes and ponds  Watercourses 500 ft  Animal or fowl kept  See Attached
(c)	Lakes and ponds  Watercourses 500 ft  Animal or fowl kept  See Attached
	Animal or fowl kept  See Attached
	See Attached
	See Attached
	Location Map
Scale: ½ inch = 100 feet	well site.
12. I have read this application and agree to comply with all laws regulating the type of v	ork being performed.
C-57 Contractor's Signature	Date 3-21-07
County Registration No. 161 California Licens	
	- TIT
DISPOSITON OF PERMIT	
Sent to Water Agency for review. (For Department Use Only)	
Water Agency conditions or recommendations attached.	
Denied	
Approved subject to the following:  A. Notify the Department,  Safe Drinking Water Program, (909) 387-4666	twenty four (24) hours in a
to make an inspection of the following operations:	, twenty-four (24) hours in advance
Prior to sealing of the annular space or filling of the conductor casing.	
□ After installation of the surface protective slab and pumping equipment	
During destruction of wells, prior to pouring the sealing material	
Market Mall Dalled B	
Dodiological Aug.   Co.	hemical Analysis
☐ Radiological Analysis ☐ General Mineral ☐ Organic Ch	emical analysis
Comments U.S. I salt and Whillie Region, the Havasu National Wildlife Region, and the destruction of PGE-6. All necessary fermits are in place	

Attachment 4 Video Report





Company: CH2MHILL	-	2 2 2	Job Ticket:	7251	Run No.: 1	
Address: 2285 Corporate Circle	#200		Well Number:			
City: Henderson		te: NV Zip: 89074				
Requested By:		P.O.:	Well Owner:			
Сору То:			Camera: CCV	Color Flip Camera	a - Long L.H.	
Reason For Survey: General Inspect				Top of Casing		
Operator: John Burbano Lat.:		Long.1 <u>14° 29' 35.6"</u>				
Location: Topock Compressor Statio				_Well Depth:	Van:_TO-5	
Casing I.D. At Surface: 14" I.D. R  (NOTE: Latitude and Longitude values determined using a re			AND THE RESIDENCE OF THE PARTY			
SELECTED WELLBORE SNAPSHOTS	TRUE DEPTHS (SideScan - Feet)	ate to 17-40. The SEC, TWF, NGE &	WELLBORE / CASING		, accuracy not guaranteed.	
0050' (See Other Side) 0060' (See Other Side)		Downview Depths ar	e 13" deeper than S	ideScan Depths		
	0'	Recording Starts - Z	eroed on Sideview Le	ens at Top of Casir	ng	
	50'	Sideview - Hole in (	Casing			
0062' (See Other Side) 0105' (See Other Side)	60'	Sideview - Hole in (	Casing			
	62-90'	Downview of Holes in Casing				
epE2 siles	105'	Downview of Static V	Vater Level at 106'			
/+)	135'	Downview of Heavy	Build-up			
0135' 0142' (See Other Side)	160'	Downview of Fill at 1	61', Appears Like Sc	aling and Gravel, E	End of Survey	
0160' (See Other Side)						
	(Insmega	in total		Junta	ecreto S. (Enterpe	
	100					
14						
	7.4					



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