Hualapai Department of Cultural Resources
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September 15, 2014 **HDCR File 2014-742**

VIA ELECTRONIC MAIL
U.S. Department of the Interior, Bureau of Land Management
Ms. Kimberly Liebhauser
Field Manager, Lake Havasu City
2610 Sweetwater Avenue
Lake Havasu City, Arizona 86406-9071

Ms. Pamela S. Innis
Topock Remedial Project Manager
Office of Environmental Policy and Compliance
U.S. DEPARTMENT OF THE INTERIOR
P.O. Box 25007 (D-108)
Denver, Colorado 80225-007

Re: Invitation to Review and Comment on Pacific Gas & Electric Topock Compressor Station Decommissioning Plan for Topock Compressor Station Well 4 (TCS-4) July 11, 2014. Document ID: PGE20140711A

Dear Ms. Liebhauser:
On behalf of the Hualapai Tribe, we appreciate being able to respond to the *Topock Compressor Station Decommissioning Plan for TCS-4.* As we requested in a past comment letter addressed to DTSC (HDCR2014-670, May 2, 2014), Hualapai prefer to be informed of each well to be decommissioned as it occurs, on a case-by-case basis. As this is the first well to be decommissioned, we appreciate being consulted and have read the document and have several concerns which we've outlined below. As we understand, TCS-4 is an older well, constructed in the 1950's and is located in the bottom of Bat Cave Wash. According to the decommissioning plan (July 11, 2014 CH2M Hill), the well was "buried in sediment deposited in the wash bottom," and has been recently re-located and potholed. As a matter of record, Hualapai prefer that the well casing be left-in-place.

Our concerns are as follows:
1. This particular well is outside the normal decommissioning protocol, (September of 2014) due to the age and purpose of the well. In evaluating the well, the plan states that a search for

well documentation information was not successful (Section 2.1, page 3), and that additional field work "would need to be conducted to evaluate the construction and current condition of the well." For instance is TCS-4 considered a Class IV Well by CAL EPA standards? If so, is the permitting process different than what is proposed? Hualapai asked a representative of DTSC if TCS-4 was a Class IV well, and they responded, "I don't know as we don't have a lot of real data/information regarding its operation. Also, due to its age in the 60's don't know how the current classification system applies legally to these types of wells" (personal communication September 15, 2014). In view of the lack of sold information, Hualapai feel that it is pre-mature to implement the work plan without having the well documentation review complete.

2. Backfill: (Section 2.1, page 4). Soil from the potholing and initial investigations that took place in April 2013 was used as back-fill. Data within the decommissioning plan states that (page 4) CrT, CrVI, molybdenum and zinc "were detected in both samples above background concentrations." Further, (page 5) dioxins and furans (both not naturally occurring) were "detected above toxicity equivalent quotients for Humans, Avians, and Mammals…" Additionally, samples taken from inside TCS-4 (March 2014) included above background levels for CrT, CrVI, copper, lead, selenium, arsenic, cobalt, nickel and zinc. Why is contaminated soil being used as backfill?

3. The pipe wrap sample (page 5), has asbestos containing materials. Does the soil have asbestos fibers?

4. Per the plan, (page 5) water quality data indicates that TCS-4 is "within the area of the hexavalent chromium plume," and that "TCS-4 is an old, damaged production well, not a properly constructed monitoring well," indicating that data may be compromised. Again, Hualapai feel that it is pre-mature to implement the work plan without having the well documentation review complete, with supporting data available to the tribes for review.

5. Filler material: (page 6). This is confusing; is the filler going to be neat cement or? The plan states that "Displaced site material will be used to backfill the portion of the borehole/excavation above sealed interval." Where *is displaced site material* coming from? AOC-4 material was completed removed due to hazardous material. TCS-4 is within the area of the chromium plume. Will *displaced site material* become contaminated from existing contaminated soil conditions at TCS-4? Section 2.3.2, (page 7) states, that "The excavation will then be backfilled using the same material that was excavated…" The soil is contaminated as stated above, so it seems to Hualapai that this is contradictory and does not make any sense. Same applies to Section 2.3.4, *Decommissioning the well head,* why use contaminated soil as backfill?

In summary, there appears to be inconsistencies regarding treatment of excavated soils, lack of data, and contaminated soil conditions, not to mention contaminations within the well casings. In our opinion, Hualapai feels that the decommissioning plan is inadequate and pre-mature. As this well is the first well to implement the decommissioning standard operating procedure, it is very important that all data be available and not compromise safety protocols. It is our recommendation that further discussions are required prior to decommissioning TCS-4.

We appreciate our on-going consultations and collaborations with the Topock Remediation Project and look forward to meaningful dialogue through-out the up-coming years. If you have any concerns please feel free to contact myself, or Dawn Hubbs, Program Manager and we will be happy to assist you.

Sincerely,

Loretta Jackson-Kelly, Director and Tribal Historic Preservation Officer
Hualapai Department of Cultural Resources

Cc:
Ms. Sherry J. Counts, Chairperson, Hualapai Tribal Council
Mr. Rudy Clark, Sr., Councilman, Hualapai Tribal Council
Ms. Carrie Imus, Councilwoman, Hualapai Tribal Council