



November 15, 2006

Mr. John Earle  
Refuge Manager  
Havasu National Wildlife Refuge  
P.O. Box 3009  
317 Mesquite Ave.  
Needles, CA 92363

Subject: **PG&E Topock Remediation Site  
Request for Approval to Implement the Upland In Situ Pilot Study and  
Supporting Activities, Supplemental Information**

Dear Mr. Earle:

This letter supplements my letter dated October 9, 2006 requesting approval to implement the *In Situ Hexavalent Chromium Reduction Pilot Test Work Plan – Upland Plume Treatment* on the United States Fish and Wildlife Service (USFWS) Havasu National Wildlife Refuge (HNWR) near the Pacific Gas and Electric Company (PG&E) Topock Compressor Station (TCS). That letter laid out the proposed activities, schedule, and authorizations and approvals required to implement the Upland In Situ Pilot Study Work Plan, and other activities proposed to be performed concurrently with the pilot study. The additional activities at existing wells include the decommissioning of PGE-6, retrofitting of PGE-7, and aquifer testing at MW-48, PGE-7, and PGE-8.

Our understanding is that the U. S. Bureau of Land Management (BLM) will take the lead in coordinating the any necessary consultation pursuant to the National Historic Preservation Act (NHPA). Communications with Department of Interior and BLM staff have indicated that additional information is needed to initiate the NHPA-required consultations.

Therefore, to supplement the information in my October 9, 2006 letter, enclosed are the following two work plans:

- Work Plan for Hydraulic Testing in Bedrock Wells
- Well PGE-6 Revised Decommissioning Work Plan

DTSC has reviewed these two work plans and has determined that the workplans are adequate and have sufficient detail for PG&E to pursue the necessary permits and approvals.

The majority of the activities proposed in these work plans are located on the HNWR in close proximity to the proposed Upland In Situ Pilot Study location, particularly the decommissioning of PGE-6, and the proposed retrofitting and aquifer testing at PGE-7. These activities are proposed to be performed concurrently with the construction of the Upland In Situ Pilot Study wells. PG&E also proposes to perform aquifer testing at PGE-8. Although this well

is not located on the HNWR, a number of observation wells for PGE-8 testing are located on the HNWR, and the PGE-8 testing is proposed to be performed concurrently with construction of the Upland In Situ Pilot Study wells. Lastly, PG&E proposes to perform an aquifer test at MW-48. The schedule for this test is independent of the Upland In Situ Pilot Study, but because MW-48 is located on the HNWR, your approval is requested.

Along with a copy of this letter, PG&E is providing BLM with 21 hard copies of each of these work plans to facilitate any NHPA consultation that may be required. In addition, PG&E is separately sending a cultural resource evaluation to support the NHPA process. We understand that you will coordinate with BLM to initiate any NHPA consultations.

It is our understanding that no additional information or consultation is needed for the compliance with the Endangered Species Act, and that it is your agency's position that, similar to the Upland In Situ Pilot Study, these additional activities would have no effect on listed species.

Based on discussions with you and BLM personnel, we understand that the following approval schedule is anticipated:

**NHPA**

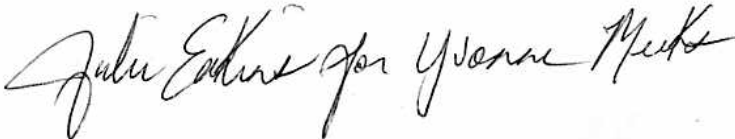
Tribal Consultation	11/17/06 – 12/17/06
State Historic Preservation Office Consultation	12/21/06 – 1/20/07

**HNWR letter of authorization**

**At the completion of NHPA consultation.  
Anticipated 1/31/07**

PG&E appreciates your consideration of our request to approve the Upland In Situ Pilot Study and supplemental activities. Please contact me at (805) 234-2257 with any questions or concerns concerning this request.

Sincerely,



Yvonne Meeks  
Topock Remediation Project Manager

Enclosures

Cc: Aaron Yue/DTSC  
Casey Padgett/DOI  
Cathy Wolff-White/BLM