

Shallow Wells (Upper Depth Interval)

Intermediate Wells (Middle Depth Interval)

Deep Wells (Lower Depth Interval)

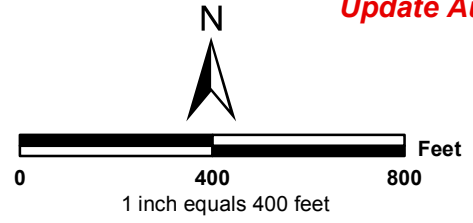
- LEGEND**
- Groundwater Monitoring Well
 - ⊠ Interim Measures (IM) Extraction Well
 - - - 50 - - - Inferred hexavalent chromium Cr(VI) concentration contour (ug/L or ppb) based on April-May 2006 sampling results

IM PERFORMANCE MONITORING CONTINGENCY PLAN - AUGUST 2006

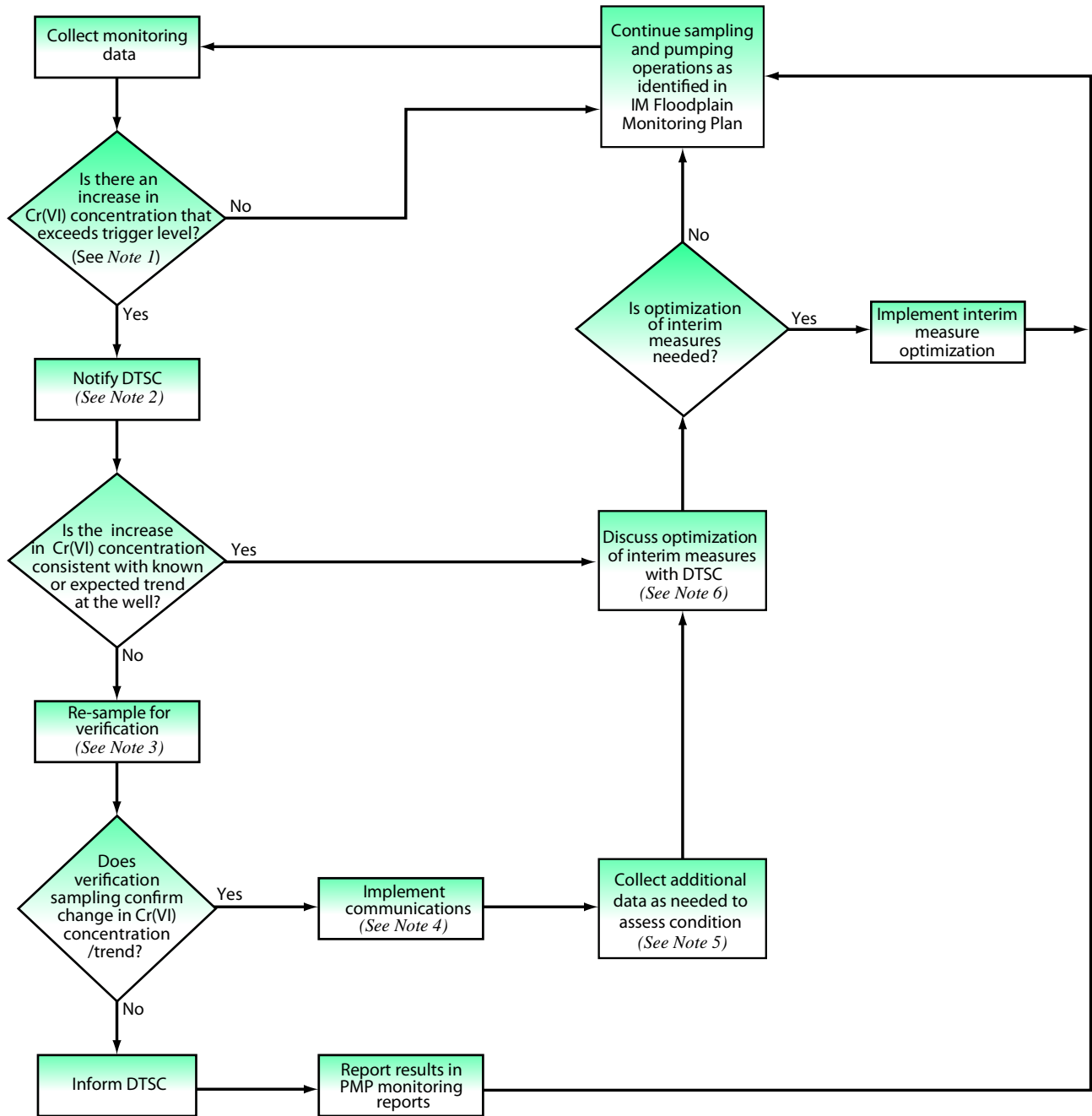
● MW-33-40 Selected Well for Contingency Plan Monitoring

Refer to Table 1 for Cr(VI) trigger concentrations for implementing Contingency Plan (Figure 2).

**Revision - 1
Update August 2006**



**FIGURE 1
CONTINGENCY ASSESSMENT WELLS FOR
PERFORMANCE MONITORING**
INTERIM MEASURES PERFORMANCE MONITORING PROGRAM
PG&E TOPOCK COMPRESSOR STATION
NEEDLES, CALIFORNIA



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NOTES:

1. The wells subject to this contingency plan are defined in Table 1 and shown on Figure 1. Trigger concentrations for implementing Contingency Plan defined in Table 1 for each well.
2. Notification will be provided to DTSC within 48 hours following receipt of validated laboratory results.
3. For Lower Depth Interval wells, verification sampling to consist of re-sampling the well on a bi-weekly frequency for two events, with results reported to DTSC within 8 days of sample collection for each event. For wells in the Upper and Middle Intervals, verification sampling to consist of monthly sampling for two events, with results reported to DTSC within 20 days of sample collection for each event.
4. DTSC to notify Consultative Workgroup. For Lower Depth Interval Wells, PG&E to notify key stakeholders.
5. Data needed to assess trend or condition may include increased sampling frequency at triggered well, increased sampling at adjacent wells (i.e., lateral, vertical), or collection of additional data to assess change in geochemical conditions.
6. Assess the gradient direction and extent of capture zone near the triggered well and optimize Interim Measures accordingly. Optimization may include change to pumping rates or extraction well locations to ensure capture, or other measures such as enhanced reductive treatment in affected area.

FIGURE 2
CONTINGENCY PLAN
INTERIM MEASURES PERFORMANCE
MONITORING PROGRAM,
PG&E TOPOCK COMPRESSOR STATION
NEEDLES, CALIFORNIA
CH2MHILL

TABLE 1
 Assessment Monitoring Wells for IM Performance Monitoring
 Interim Measures Performance Monitoring Program
 PG&E Topock Compressor Station, Needles, California

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Assessment Monitoring Well ¹	Well Location Relative to Cr(VI) Plume	Cr(VI) Concentrations ² March-June 2006	Trigger Level ³ for Implementing IM Contingency Plan
Shallow Wells (Upper Interval)			
MW-21	outside plume	ND (2)	IM target concentration
MW-32-20	outside plume	ND (2)	IM target concentration
MW-32-35	outside plume	ND (2)	IM target concentration
MW-33-40	outside plume	ND (1)	IM target concentration
MW-39-40	outside (above) plume	ND (1)	IM target concentration
MW-47-55	plume margin, northern floodplain	10.9 - 24	Statistical control limit (update annually)
Intermediate Wells (Mid-Depth)			
MW-33-90	plume margin, northern floodplain	16.1 - 19.3	Statistical control limit (update annually)
MW-36-70	outside (above) plume	ND (1)	IM target concentration
MW-42-55	outside plume	ND (1)	IM target concentration
MW-42-65	outside plume	ND (1)	IM target concentration
MW-44-70	outside (above) plume	ND (1)	IM target concentration
Deep Wells (Lower Interval)			
MW-27-85	outside plume	ND (1)	IM target concentration
MW-28-90	outside plume	ND (1)	IM target concentration
MW-33-150	outside (below) plume	4.2 - 6.6	IM target concentration
MW-33-210	outside (below) plume	4.2 - 10.7	IM target concentration
MW-34-80	outside (above) plume	ND (1)	IM target concentration
MW-34-100	easternmost well in plume	800 - 976	Trend Analysis (evaluate quarterly; update if needed)
MW-43-75	outside plume	ND (1)	IM target concentration
MW-43-90	outside plume	ND (1)	IM target concentration
MW-44-115	inside plume	1,420 - 1,710	Statistical control limit (update semiannually)
MW-44-125	inside plume	362 - 634	Statistical control limit (update semiannually)
MW-46-175	within plume, central floodplain	111 - 287	Statistical control limit (update semiannually)
MW-46-205	outside (below) plume	ND (1)	IM target concentration
MW-47-115	outside (below) plume	ND (2) - 1.4	IM target concentration

Notes:

- See Figure 1 for location of monitoring wells in Contingency Plan for Interim Measures performance monitoring.
- Hexavalent chromium [Cr(VI)] results are range of concentrations, in micrograms per liter (µg/L), detected in 2nd quarter 2006 sampling. ND (1) = not detected at listed reporting limit.
- The Cr(VI) sampling trigger levels for implementing the IM Contingency Plan (provided as Figure 2):
 - ND wells and wells with Cr(VI) detections <20 µg/L: Use the Target Concentration for IM hydraulic containment (20 µg/L).
 - Wells with Cr(VI) detections >20 µg/L: Calculate Shewart Control Limit semiannually or annually from most recent 8 sampling events.
 - Wells with increasing Cr(VI) detections (MW-34-100): Evaluate by Trend Analysis using Sen's Estimation of Slope method. Calculate 95% upper confidence limit of median slope of Cr(VI) concentrations from past year of sampling data. Evaluate new results quarterly by comparing 3-month trend to Sen's median slope estimation. Contingency Plan triggered if quarterly trend exceeds upper confidence limit median slope.

Statistical procedures for control limits and trend analysis described in Monitoring Plan for IM Performance Monitoring Program, Revision-1.

Contingency Plan trigger levels or evaluation methods may be modified pending consultation with DTSC.