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November 22, 2015

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

Subject: *Request for third extension to obtain access agreements for the completion of work under the Soil RFI/RI Workplan for the Topock Remediation Project, Needles, California.*

Dear Mr. Yue:

PG&E is submitting this notification to DTSC per the second extension approval letter dated November 2, 2015, Request For Second Extension To Obtain Access Agreements For Work Specified In The Soil RFI/RI Work Plan For The Pacific Gas And Electric Company (PG&E), Topock Compressor Station, Needles, California (EPA ID No. Cat080011729). Prior to the second extension approval, PG&E received concurrence from Caltrans on October 28, 2015. Therefore, two access approvals remain pending for the Soil Investigation, from the ADOT and BNSF. PG&E initially submitted materials to the ADOT on September 29, 2015 requesting for lane closure and also submitted an application for private crossing to BNSF on October 12, 2015. Since these submittals, PG&E has followed up regularly with the ADOT and BNSF. We do believe we are close to obtaining both access approvals. Ronnie Garcia of BNSF visited the crossing location with PG&E's Curt Russell and Eli Ludwig on November 19, 2015. Mr. Garcia indicated he would recommend for BNSF approval for the crossing agreement. The ADOT recently requested an additional submittal of a traffic control plan as the only other item needed prior to their concurrence.

According to DTSC's second extension approval, DTSC requests an analysis of alternatives for completing the investigation should either ADOT or BNSF deny access. The analysis is described below and includes "the sample locations that would be impacted, the critical dates by which access must be received to maintain current project schedule and any alternative(s) that PG&E can take, in the unlikely event that such access is denied."

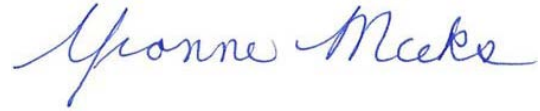
Within the BNSF right-of-way, no sampling is currently anticipated to be required, as PG&E only needs a private crossing agreement to access sampling location AOC1-T6d within San Bernardino County's jurisdiction. However, PG&E would have to cross through the BNSF ROW with a drill rig to access the sampling location. Only a drill rig can be used here due to the depth of the location at AOC1-T6d. This location is currently scheduled to be sampled in late January/early February of 2016. If we cannot gain access through BNSF property, then the contingency would be to compromise on the total depth at this location, and only sample as deep as practicable with hand tools. Alternative access to the sampling location would be from the south through the Caltrans culverts.

Without the ADOT approval for the lane closure, the sampling locations impacted would be AOC14-14, -15, -16, and -17, and any boreholes that are added as a result of XRF survey of AOC 14. Similarly, if we cannot gain access through ADOT by late January 2016, the contingency is to compromise depth of the sample locations and sample as deep as practicable using hand tools with access from the west out of BCW via a foot path.

PG&E anticipates concurrence will be received by both ADOT and BNSF and we will continue to provide updates to the DTSC within five days when concurrence is received.

If you have any questions regarding this notification, please contact me at (805) 234-2257.

Sincerely,

A handwritten signature in blue ink that reads "Yvonne Meeks". The signature is written in a cursive, flowing style.

Yvonne Meeks  
Topock Remediation Project Manager