



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
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Cypress, California 90630



Edmund G. Brown Jr.
Governor

Via Electronic Mail

September 27, 2016

Ms. Yvonne Meeks
Portfolio Manager – Site Remediation
Pacific Gas and Electric Company
4325 South Higuera Street
San Luis Obispo, California 93401

GATHERING OF HISTORICAL WELL INFORMATION AT PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks,

On May 22, 2014, the Department of Toxic Substances Control (DTSC) requested additional information from PG&E on wells associated with historical operations at the Topock Compressor Station. PG&E provided responses to the DTSC request on July 18, 2014. Our evaluation of the July response was temporarily halted to focus on soil investigation and groundwater remedy activities for the PG&E Topock compressor station. DTSC is resuming the effort to ensure wells that are no longer useful to PG&E are properly decommissioned according to state regulatory standards. Furthermore, we note that PG&E's July 18, 2014 response was focused on water supply wells. DTSC would like to clarify that the regulatory requirements for proper well decommissioning apply to any groundwater well and are not limited to water supply wells.

PG&E should take account of all wells related to the PG&E site, including those documented in the July 18, 2014 letter, and ensure all wells are listed in the Topock Well Inventory. PG&E must develop a reasonable strategy to locate lost wells that are either not properly decommissioned or are not currently accounted for in the Topock Well Inventory. After locating wells that will no longer provide useful data, PG&E must also gather sufficient information to develop an adequate plan for well decommissioning. Comments associated with select wells identified in PG&E's July 18, 2014 response are included below.

PG&E needs to indicate if any wells other than TCS Well #4 and PGE-8 were used historically to dispose of wastes in the compressor station area. This is required to assign an appropriate priority to the well decommissioning investigations. Finally, since most of the references

contained in PG&E's July 18, 2014 letter have not been shared with DTSC, it is requested that they be posted electronically on a shared drive for easy distribution. DTSC understands that some of the documents may not necessarily be clear or legible.

1. **Well #1:** PG&E has indicated that this well, located in the Transwestern Bench area, was possibly an exploratory well drilled in 1950 prior to construction of the compressor station. As PG&E has no information on the current condition of the well, PG&E must make attempts to locate and properly decommission the well according to California Well Standards. PG&E should prepare a work plan that will attempt to locate the well and, at a minimum, include conducting a detailed geophysical survey of the area with an option to pothole at geophysical anomalies that are suggestive of a buried well. DTSC would like to also better understand the actual methods used in plotting this well on Figure 2 of the July 18, 2014 letter to understand the error associated with the plot to ensure that the geophysical survey targets a sufficiently large area that is appropriate for the investigation. DTSC notes that Well #1 occurs within or very near remedial structures and construction identified in the groundwater basis of design report. Therefore, attempts to locate this well should be implemented as soon as possible to ensure groundwater remedy construction is not hindered or delayed.
2. **Well #2:** Figures 1 and 3 of the July 18, 2014 letter illustrate the approximate location of this well that PG&E indicates was an exploratory well drilled in 1950 prior to construction of the compressor station. As with Well #1, a work plan will need to be prepared to conduct a geophysical survey that also includes potential potholing to investigate appropriate anomalies. DTSC requests that the method that was used to locate Well #2 be documented as it is not pictured on any documents that DTSC currently possess. DTSC notes that Well #2 occurs within or very near remedial structures and construction identified in the groundwater basis of design report. Therefore, attempts to locate this well should be implemented soon to ensure groundwater remedy construction is not hindered or delayed.
3. **Wells #3 and #5:** The location of these two wells is not identified in any figures or text provided by PG&E. PG&E should continue to search for and review files and attempt to ascertain the locations of these wells, even if only a general area is ultimately identified. Currently, PG&E should identify likely locations based on well casing elevations and flat areas from 1950 that might accommodate a drill rig (e.g., Well #3 elevation of 475 feet suggests it could be located near/in Bat Cave Wash).
4. **Well No. 1 and Well No.2:** DTSC concurs with PG&E's proposal to conduct a geophysical survey of the Well No.2 / PGE-02 area to attempt to locate the well. The work plan to be prepared for this survey should also include potential potholing to investigate geophysical anomalies identified by the survey that are suggestive of a buried well casing or horizontal supply line associated with the well that could assist in finding the well as was done at TCS Well #4.

5. **Topock Well No. 1:** PG&E's July 18, 2014 letter indicates that the property owner believes that the well was capped and covered with dirt. PG&E should ascertain if it is possible to locate the well to see if it might be monitored (e.g., water levels) as part of the remedy.

DTSC understands that PG&E is interested in coordinating some of these activities with the mobilization for the soil investigation data gap field work; therefore, DTSC request that PG&E provide a response to the items above by November 14, 2016. If you have any questions regarding this letter or information requested, please contact Chris Guerre at christopher.guerre@dtsc.ca.gov.

Sincerely,



Aaron Yue
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Geological Services Branch
Department of Toxic Substances Control

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cc: PG&E Topock Consultative Workgroup Members
PG&E Topock Geo/Hydro Technical Workgroup Members
Tribal Representatives in PG&E Project Contact List
Technical Review Committee