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March 10, 2025

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Office of Environmental Policy and Compliance (OEPC)
US Department of Interior

Mr. Christopher Ioan
California Department of Toxic Substances Control
5796 Corporate Avenue
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Subject: February 2025 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California
(Document ID: TPK_Monthly_Progress_Rpt_February 2025_20250310)

Dear Ms. Dickerson and Mr. Ioan:

In compliance with the *1996 Corrective Action Consent Agreement* (Attachment 6, Part E, Section 9a and Attachment 7) and the *2013 Remedial Design/Remedial Action Consent Decree* (Paragraph 32 and Appendix C, Section 5), and pursuant to the *Construction/Remedial Action Work Plan (C/RAWP)* (Section 2.6.3.1), this monthly report describes activities taken at Pacific Gas and Electric Company's (PG&E's) Topock Compressor Station in February 2025, as well as activities planned for the next six weeks (March 2 to April 12, 2025), and presents available results from sampling and testing, if any, performed in the reporting period.

This report also discusses material deviations from the approved design documents and/or the C/RAWP, if any, that PG&E has proposed to the California Department of Toxic Substances Control (DTSC) and U.S. Department of the Interior (DOI), or that have been approved by DTSC and DOI. This report highlights key personnel changes, if any, and summarizes activities performed and activities planned in support of DOI's 2012 Community Involvement Plan and DTSC's 2019 Community Outreach Plan, as well as contacts with the local community, representatives of the press, and/or public interest groups, if any. This report also includes data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection, as required by the Condition of Approval # xi in DTSC's approval letter dated August 24, 2018.

Please note that since activities conducted to comply with the project's Applicable or Relevant and Appropriate Requirement and the Subsequent Environmental Impact Report mitigation measures are currently reported in separate compliance reports, this information is not repeated in the monthly reports. Monthly progress reports will be submitted to DTSC and DOI by the 10th day of the following month during construction and startup of the groundwater remedy at the Topock Compressor Station which officially began on October 2, 2018. This is the 77th monthly progress report. Please contact me at (628) 219-8380 if you have any questions or comments regarding this submittal.

Sincerely,

A handwritten signature in black ink that reads "Kristina Bonnett". The signature is written in a cursive, flowing style.

Kristina Bonnett
Topock Technical Project Manager

Topock Project Executive Abstract

<p>Document Title: <i>February 2025 Monthly Progress Report for the Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California</i></p> <p>Submitting Agency: DOI, DTSC</p> <p>Final Document? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Date of Document: 03/10/2025</p> <p>Who Created this Document? (i.e. PG&E, DTSC, DOI, Other) PG&E</p>
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<p>What does this information pertain to?</p> <p><input type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA)/Preliminary Assessment (PA)</p> <p><input type="checkbox"/> RCRA Facility Investigation (RFI)/Remedial Investigation (including Risk Assessment)</p> <p><input type="checkbox"/> Corrective Measures Study (CMS)/Feasibility Study (FS)</p> <p><input checked="" type="checkbox"/> Corrective Measures Implementation/Remedial Action (RA)</p> <p><input type="checkbox"/> California Environmental Quality Act/ Environmental Impact Report (EIR)</p> <p><input type="checkbox"/> Interim Measures</p> <p><input type="checkbox"/> Other / Explain:</p>	<p>Is this a Regulatory Requirement?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, why is the document needed?</p>
<p>What is the consequence of NOT doing this item? What is the consequence of DOING this item?</p> <p>The consequence for not doing this item is PG&E will be out of compliance with the 1996 Corrective Action Consent Agreement (CACA) and the 2013 Remedial Design/ Remedial Action Consent Decree (CD), as well as the Construction/Remedial Action Work Plan (C/RAWP).</p>	<p>Other Justification/s:</p> <p><input type="checkbox"/> Permit <input type="checkbox"/> Other / Explain:</p>
<p>Brief Summary of attached document:</p> <p>This monthly report describes activities taken in February 2025 as well as activities planned for the next six weeks (March 2 to April 12, 2025) and presents available results from sampling and testing in the reporting period. In addition, this report discusses material deviations from the approved design documents and/or the <i>Construction/ Remedial Action Work Plan (C/RAWP)</i>, if any, that PG&E has proposed to the California Department of Toxic Substances Control (DTSC) and the U.S. Department of the Interior (DOI) or that have been approved by DTSC and DOI. This report also highlights key personnel changes, if any, and summarizes activities performed and activities planned at the Topock Compressor Station in support of DOI's 2012 Community Involvement Plan and DTSC's 2019 Community Outreach Plan, as well as contacts with local community, representatives of the press, and/or public interest groups, if any.</p> <p>Written by: Pacific Gas and Electric Company</p>	
<p>Recommendations:</p> <p>Provide input to PG&E.</p>	
<p>How is this information related to the Final Remedy or Regulatory Requirements:</p> <p>This submittal is required in compliance with the CACA, CD, and pursuant to the C/RAWP.</p>	
<p>Other requirements of this information?</p> <p>None.</p>	



February 2025
Monthly Progress Report for the
Final Groundwater Remedy Construction and Startup

PG&E Topock Compressor Station
Needles, California

Document ID: TPK_Monthly_Progress_Rpt_February_20250310

March 2025

Prepared for
U.S. Department of the Interior and California Department of Toxic Substances Control

On Behalf of
Pacific Gas and Electric Company



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¹ Sections/Tables/Attachments denoted with * have no changes since last reporting period. They will not appear in the body of the report. This abbreviated reporting format has been implemented since the March 2024 Monthly Progress Report.

Acronyms and Abbreviations

Acronym	Definition
AOC	area of concern
BOD	Basis of Design
CACA	Corrective Action Consent Agreement
C/RAWP	Construction/Remedial Action Work Plan
CD	Consent Decree
DOI	United States Department of the Interior
DTSC	California Department of Toxic Substances Control
ERTC	Environmental Release to Construct
ERTO	Environmental Release to Operate
IM-3	Interim Measure No. 3
IRZ	in-situ reactive zone
O&M	operations and maintenance
PG&E	Pacific Gas and Electric Company
RCRA	Resource Conservation and Recovery Act
SEIR	Subsequent Environmental Impact Report
TCS	Topock Compressor Station

1. Introduction

Pacific Gas and Electric Company (PG&E) is implementing the final groundwater remedy to address chromium in groundwater near the PG&E Topock Compressor Station (TCS), located in eastern San Bernardino County 15 miles southeast of the city of Needles, California. The U.S. Department of the Interior (DOI) is the lead federal agency overseeing remedial actions at the TCS. PG&E and the United States executed a Remedial Design/Remedial Action Consent Decree (CD), on behalf of the DOI, under the Comprehensive Environmental Response, Compensation, and Liability Act in 2012, which was approved by the U.S. District Court for the Central District of California in November 2013 (DOI, 2013). Paragraph 32 and Appendix C (Section 5) of the CD requires PG&E to submit to DOI monthly electronic progress reports during construction of the remedial action, and to submit progress reports on a quarterly basis after the selected remedy has been implemented and demonstrated to be operating as intended.

The California Department of Toxic Substances Control (DTSC) is the lead state agency overseeing corrective actions at the TCS. Remedial activities are being performed in conformance with the requirements of the Resource Conservation and Recovery Act Corrective Action pursuant to a Corrective Action Consent Agreement (CACA) entered into by PG&E and the DTSC in February 1996 (DTSC, 1996). Attachment 6, Part E, Section 9a and Attachment 7 of the CACA require PG&E to provide certain information in monthly progress reports during construction of the corrective action.

In compliance with the CACA and CD requirements, PG&E proposed a template for the monthly progress reports in Exhibit 2.6-2 of the Construction/Remedial Action Work Plan (C/RAWP) (CH2M, 2015b). The C/RAWP was approved by DOI on April 3, 2018 (DOI, 2018) and DTSC on April 24, 2018 (DTSC, 2018a).

This is the 77th of the monthly progress reports that will be submitted to DOI and DTSC for the duration of the remedy construction and startup. This monthly progress report documents activities during February 2025, and follows the content and format described in Exhibit 2.6-2 of the approved C/RAWP. The report is organized as follows:

- Sections 2.1 through 2.7 describe completed construction activities; data collected, generated or received; nature and volume of waste generated; waste handling/disposal; issues encountered; actions taken to rectify problems/issues; personnel changes; and Work Variance Requests (i.e., material deviations from the design documents, the C/RAWP, or other approved work plans), if any, as well as agencies' actions on those requests, and potential schedule impacts.
- Sections 2.8 through 2.9 summarize key project personnel changes, if any, contacts with representatives of the press, local community, or public interest groups during the reporting period, other activities provided to assist DTSC and/or DOI in support of the Community Outreach Plan (DTSC, 2019) and/or Community Involvement Plan (DOI, 2012), respectively, and anticipated near-term (approximately next six weeks) activities in support of the Community Outreach and Community Involvement Plans.
- Section 2.10 provides information relating to the construction schedule progress, sequencing of activities, information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule, and a description of efforts made to mitigate those delays or anticipated delays, if any.
- Section 2.11 presents validated data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection, as required by the Condition of Approval # xi in DTSC's approval letter dated August 24, 2018 (DTSC, 2018a).
- Section 3 lists the references cited in this report.

Note that Sections/Tables/Attachments that have no changes since last reporting period, will not appear in the body of the report. This abbreviated reporting format has been implemented since with the March 2024 Monthly Progress Report.

Please note that since activities conducted to comply with the project’s Applicable or Relevant and Appropriate Requirement and the Subsequent Environmental Impact Report (SEIR) (DTSC, 2018b) mitigation measures are currently reported in separate compliance reports, the same information is not repeated in the monthly reports.

2. Monthly Update

2.1 Work Completed

Phase 1 remedy construction, which began on October 2, 2018, includes the National Trail Highway In-situ Reactive Zone (IRZ) with 22 remediation wells (for injection and/or extraction) and a robust network of 75 monitoring wells (for measuring water levels and quality), as well as a network of over 74,000 linear feet of water conveyance piping and 41,000 feet of electrical conduits that connect the remediation wells to the power supply system, the carbon amendment building, and the Remedy-Produced Water Conditioning system. Figures 2-1 and 2-2 show the locations of key areas and wells.

Phase 1 systems and components were integrated and tested to make sure they function properly. On December 22, 2021, PG&E initiated injection of ethanol into the groundwater at select National Trail Highway IRZ wells using temporary power (i.e., portable generator). On March 24, 2022, the permanent power system (from TCS) was put in service. The Remedy-Produced Water Conditioning system inside TCS was fully operational on June 24, 2022. Between March and August 2022, the groundwater remedy experienced intermittent power outages of various durations (the contributing factors, include but are not limited to, TCS operations load shedding [i.e., power to remedy was shut off by TCS due to gas operational reasons] and/or functionality of electrical components). Portable generators were used to supply power from end of August to end of October 2022. The permanent power supply issue was resolved at the end of October 2022. The portable generators were kept onsite temporarily as contingencies and removed from site at the end of January 2023.

Concurrently, after receipt of DTSC’s and DOI’s approvals, PG&E turned off the Interim Measure No. 3 (IM-3) extraction wells (TW-2D and TW-3D) on December 21, 2021, and started to prepare IM-3 for lay-up. The preparation for lay-up was completed on March 21, 2022. PG&E notified the agencies that IM-3 is in lay-up mode on March 22, 2022. When the IM-3 system is in a lay-up condition, the system will be left in a safe, secure, and preserved state and will not operate again until agency approval is received for decommissioning and removal of the system.

Phase 2 remedy construction commenced on March 2, 2022, and includes additional wells (located in Bat Cave Wash [BCW]/TCS, on the Transwestern Bench [TWB], and along historic route 66), and pipelines connecting some of the additional wells as well as a pipeline connecting the previously installed Riverbank (RB) wells. Due to a supply chain issue for vault panels which delays the delivery of those components, a temporary pause of Phase 2A heavy construction activities was planned for mid-June to September 2023. The vault panels were received in August 2023 and installed by October 2023. On August 15, 2023, PG&E informed DTSC and DOI that PG&E intends to extend the pause as PG&E awaited further direction on the Phase 2b design modification proposal submitted to the agencies December 2022.

On October 31, 2024, DTSC and DOI issued a decision to not approve and officially reject the Phase 2b design modification proposal, leaving the design submitted on November 18, 2015 (CH2M, 2015a) (also called 2015 Basis of Design [BOD]) as the only approved groundwater remedy for the Topock site. On November 8, 2024, PG&E requested DTSC’s decision on the Phase 2b design modification proposal be reconsidered. On December 20, 2024, PG&E informed DTSC/DOI of the following plan to restart construction of the approved groundwater remedy:

- Q4 2024-Q3 2025 – Bring 2015 BOD designs up to current code, bid work for construction contracting.
- Mid Q1 2025 – Hold first look/stakeholder site walk.
- Late Q1 2025 – Prepare site for remobilization and prepare well pads.

- Early Q2 2025 – Resume drilling activities.
- Early Q4 2025 – Resume pipeline construction activities.

On February 13, 2025, DTSC replied to PG&E's November 8, 2024 request to reconsider its October 31, 2024 decision. After a review of the request and conferring with DOI, DTSC declined to change its October 31, 2024 decision.

The following is a summary of activities and work completed in February 2025:

- On July 13, 2018, PG&E sent via email the first weekly six-week look-ahead schedule for the remedy construction field work. The weekly emails provide highlights of field activities in the previous week, field activities scheduled for the next week, and planned activities for the next six weeks. Recipients of the weekly emails are DOI, DTSC, the U.S. Fish and Wildlife Service, the California Regional Water Quality Control Board, Colorado River Basin Region, the Metropolitan Water District of Southern California, Tribes, and the Technical Review Committee. PG&E continues to send these weekly emails to date. As of February 28, 2025, a total of 341 six-week look-ahead schedule emails have been sent. Of those, four six-week look-ahead schedule emails were sent in February 2025 (on February 3, 10, 17 [corrected on February 18], and 24).
- On August 10, 2018, PG&E issued the first Environmental Release to Construct (ERTC) to contractors. As of February 28, 2025, a total of 115 ERTCs (including addenda) and 10 Environmental Release to Operate (ERTOs, including addenda) were issued for construction and operation activities. The ERTCs are listed in Tables 2-1a and 2-1b. The ERTOs are listed in Table 2-1c. No new ERTCs/ERTOs or addenda were issued in February 2025.
- Starting on October 4, 2018, PG&E has published a daily construction activities list and discussed the list at the morning tailboards with Tribes and agency representatives. This daily list is intended to inform and facilitate observation by Tribes and agency representatives on site on that day. PG&E continues to publish these daily lists and discuss the list at the daily morning tailboards to date. Two daily activity lists were issued in February 2025.
- In February 2025, PG&E performed the following remedy construction and O&M activities:
 - **February 2 to 8 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. Example O&M activities include:
 - Process monitoring -- Inspect wells and system areas, adjust operational parameters including extraction and injection well flowrates and ethanol dosing concentrations;
 - Well and system maintenance – Backwash injection wells, chemical and physical rehabilitation of IRZ wells, operate water conditioning system, perform routine preventative maintenance; and
 - General system/site inspection – inspection of access roads and monthly inspection of industrial SWPPP best management practices.
 - O&M of revegetation areas.
 - Completed monthly groundwater sampling at various locations.
 - **February 9 to 15 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. See example O&M activities in the first bullet above.
 - Continue sampling at TCS evaporation ponds, river sampling, and sampling of non-project water supply wells in Arizona (aka, Hydro-6 wells).
 - **February 16 to 22 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. See example O&M activities in the first bullet above.

- Completed sampling at TCS evaporation ponds, river sampling, and sampling of non-project water supply wells in Arizona (aka, Hydro-6 wells).
- **February 23 to March 1 activities:**
 - Continued IRZ circulation and ethanol injection O&M activities, including O&M support activities. See example O&M activities in the first bullet above.
 - Conducted quarterly groundwater sampling at various locations.

2.2 Freshwater Usage, Waste Generation, and Management

In February 2025, freshwater usage, waste generation, and management are as follows:

2.2.1 Freshwater and Wastewater

- In February 2025, an approximate total of 6,150 gallons of freshwater was used for IRZ wells rehabilitation and 72,813 gallons was used for O&M activities in the revegetation areas.
- For the reporting period, an estimated 56,550 gallons of remedy-produce water (after conditioning) was re-injected into the aquifer. Prior to reinjection, the conditioned water is sampled in accordance with the approved sampling plan in the O&M Plan. Analytical data for remedy-produced water is included in Attachment G. To date, there has been no offsite disposal, or disposal to the PG&E TCS evaporation ponds, of remedy-produced water generated from O&M activities.

2.2.2 Displaced Materials/Soils/Clay

- No displaced materials or excess soils were generated in February 2025.

2.2.3 General Construction/O&M Waste, Sanitary Waste, and Recyclables

- In February 2025, approximately one cubic yard of general waste was generated and hauled to local landfills. In addition, spent filters were generated from the bag filter at well PTI-1D.
- Sanitary waste from construction trailers/portable toilets is hauled offsite as needed.

2.3 Worker Training and Education

- Two safety training sessions occurred in February 2025, with a total of two personnel trained.
- A total of eight personnel was trained or retrained in February 2025.
- No Field Contact Representative (FCR) training session was conducted in February 2025.

2.4 Status of Work Variance Requests*

No changes to report this month.

2.5 Use of Future Activity Allowance*

No changes to report this month.

2.6 Issues Encountered and Actions Taken to Rectify Issues/Problems*

No changes to report this month.

2.7 Key Personnel Changes*

No changes to report this month.

2.8 Communication with the Public*

No changes to report this month.

2.9 Planned Activities for Next Six Weeks

The planned activities for next six weeks (March 2 to April 15, 2025) include the following:

- Continue IRZ O&M including revegetation and maintenance of revegetation area.
- Continue groundwater sampling.
- Hold a Project Initiation Meeting for Phase 2b construction on March 4, 2025.
- Hold a Pre-Work Field Review for work at IRL-2, IRL-3, and MW-I on March 6, 2025.
- Commence site preparation for drilling at IRL-2, IRL-3, and MW-I.
- Continue to conduct inspection of Stormwater Pollution Prevention Plan best management practices, as needed.
- Continue to manage displaced soil per the approved Soil Management Plan, as needed.

Attachment G contains the six-week look-ahead schedule available at this time. Any adjustments to the schedule will occur as needed via the weekly emails (sent at the start of each week) and/or the daily list of construction activities (published daily and discussed with agency and Tribal representatives on site on that day).

2.10 Construction Schedule Review*

No changes to report this month.

2.11 Available Sitewide Groundwater Monitoring Data (DTSC Condition of Approval xi)

Pursuant to Condition of Approval # xi in DTSC's approval letter dated August 24, 2018 (DTSC, 2018a), PG&E is required to report data from samples collected as part of the sitewide groundwater monitoring program within 60 days of sample collection. In compliance with this requirement, PG&E submitted validated data to DTSC via monthly emails. For ease of recordkeeping and to minimize the number of ad-hoc compliance reports/emails, PG&E has included data in each monthly progress report starting with the November 2018 monthly report. The data are included in Attachment G of this report.

2.12 IM-3 Shutdown and Preparation for Layup*

No changes to report this month.

2.13 Summary of Releases Occurred During Groundwater Remedy Construction and Startup

At the request of DTSC, a summary of releases (or spills) that occurred outside of containment and onto ground is provided in Table 2-5. The summary provides information about each release include date, location of release, type of material released, amount of material released (if known), and associated cleanup activities.

On February 12, 2025, approximately 0.1 gallon of oil was released to ground from a rental telehandler at the MW-20 Bench. See Table 2-5 for details.

3. References

California Department of Toxic Substances Control (DTSC). 1996. *Corrective Action Consent Agreement (Revised), Pacific Gas and Electric Company's Topock Compressor Station, Needles, California*. EPA ID No. CAT080011729. February 2.

California Department of Toxic Substances Control (DTSC). 2018a. *Acceptance and Conditional Approval of Groundwater Remedy Design and Corrective Measures Implementation Workplan at Pacific Gas and Electric Company, Topock Compressor Station, Needles, California*. April 24.

California Department of Toxic Substances Control (DTSC). 2018b. *Final Subsequent Environmental Impact Report for the Pacific Gas and Electric Company Topock Compressor Station Final Groundwater Remediation Project*. April 24.

California Department of Toxic Substances Control (DTSC). 2019. [Community Outreach Plan, Pacific Gas and Electric Company's Topock Compressor Station, Needles, California](#). May.

CH2M HILL, Inc. (CH2M). 2014. *Final Programmatic Biological Assessment for Pacific Gas and Electric Topock Compressor Station Final Groundwater Remedy*. April 28.

CH2M HILL, Inc. (CH2M). 2015a. *Basis of Design Report/Final (100%) Design Submittal for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California*. November 18.

CH2M HILL, Inc. (CH2M). 2015b. *Construction/Remedial Action Work Plan for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California*. November 18.

United States Department of the Interior (DOI). 2012. [Community Involvement Plan, Pacific Gas and Electric Topock Compressor Station, Needles, California](#). September.

United States Department of the Interior (DOI). 2013. *Remedial Action/Remedial Design Consent Decree (CD) between the United States of America and Pacific Gas & Electric Company*. Case 5:13-cv-00074-BRO-OP, Document 23. Entered November 21.

United States Department of the Interior (DOI). 2018. *Approval of PG&E Topock Compressor Station Remediation Site – Basis of Design Report/Final (100%) Design Submittal and Construction/Remedial Action Work Plan for the Final Groundwater Remedy and the Supplemental and Errata Information for the Final (100%) Design for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California*. Letter from Pamela Innis/DOI to Curt Russell/PG&E. April 3.

Tables

The following tables did not have any updates, and are not included in this monthly report:

Table 2-1a. Summary of Non-Well Environmental Release-To-Constructions

Table 2-1b. Summary of Well Environmental Release-To-Constructions

Table 2-1c. Summary of Environmental Release-To-Operate

Table 2-2. Monitoring Wells Nomenclature Changes

Table 2-3. Summary of Work Variance Requests

Table 2-4. Summary of Cumulative Percent Completeness of Key Phase 2 Construction Activities

Table 2-5. Summary of Releases Occurred During Groundwater Remedy Construction and Startup
February 2025 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
2/12/25	MW-20 Bench	A release of hydraulic oil from a rental telehandler to ground.	Hydraulic oil	About 0.1 gallon	The rental telehandler was inspected upon delivery and used for two days prior to the release. A mechanic inspected the equipment on 2/13/25 and determined that repair was needed. The equipment was removed from the site on 2/18/25. Approximately 1.5 gallons of impacted soil and rock was removed and placed into a bucket. The bucket is stored at the MW-20 Bench.	If equipment is to be driven for a longer period of time at a higher RPM than the normal running speed (i.e. if it is being driven down the road to another work site), a secondary inspection will be conducted upon arrival to the work area in addition to the morning inspection. The Heavy Equipment Operation JSA has been marked up to document this change.
1/11/25	IRZ-37	A release of approximately 0.5 gallon of well rehabilitation acid solution was released from a transfer hose to ground.	Well rehabilitation solution (a mixture of well rehab acids [Nuwell 210 and Nuwell 310], and freshwater	About 0.5 gallon	Approximately 3 gallons of impacted soil were removed and placed into a bucket. The bucket was brought to the MW-20 Bench. A sample of the impacted soil was collected by Compliance personnel on 1/14/25 for analysis. Analytical results indicated that the impacted soil is non-hazardous.	SOP was updated to clarify process disconnecting any hose sections and ensuring the plastic liner on the ground is long enough to fully walk out the lengths of hoses used to perform work.
8/24/23	NTCRA AOC10-1 Ramp (NTCRA related)	A release occurred when a super ten dump truck departed the NTCRA AOC10-1 ramp. The forward movement caused the diesel tank to slosh and release diesel from the cap and onto the dirt ramp. The release location is on PG&E property.	Diesel	4 ounces	The dump truck was inspected before leaving the decon pad. No leaks were observed. Approximately 5 gallons of impacted soil were removed and placed into a bucket along with 6 sorbent pads used to clean off the tank. The bucket was brought to the TCS hazardous material building for pick up in the next milk run.	Truck drivers were reminded to not fill the fuel tank above the target level.
8/7/23	IRZ-18 (North end of MW-20 Bench)	A broken check valve fitting in the IRZ-18 well vault caused backwash water to accumulate and overflow the well vault and onto the ground. The water release did not leave the site.	IRZ backwash water	200 gallons	The O&M contractor roped off the release area and evacuated the water inside the vault and transferred to the MW-20 Bench frac tank. Based on a discussion with the land owner (BOR), land manager (BLM),	An incident report was provided to the agencies on August 10, 2023. The programming and installation of the automated valves required for automated backwashing was completed the week of August 14, 2023. If a similar failure occurs,

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
					<p>DTSC, and DOI on 8/15/23, four soil samples were collected on 8/22/23 within the release area. The soil samples were collected at approximately 1 foot below ground surface and analyzed for Title 22 metals and hexavalent chromium.</p> <p>A summary of the soil sampling results and a comparison to background and baseline soil data were provided in an email to the landowner (BOR), land manager (BLM), and the regulatory agencies on 9/7/23. Based on data and the comparative analysis, PG&E recommended that no further action is necessary for the release. The BOR acknowledged receipt of the update on the same day.</p>	<p>with the automated features all pumping will stop immediately upon alarm.</p>
7/25/23	Pipeline B Access Road (NTCRA related)	<p>A third-party mechanic (Komatsu) was onsite to conduct maintenance on an excavator located on Pipeline B Access Road. The maintenance work itself was conducted on plastic sheeting, however, oil dripped from the nearby mechanic's truck onto the dirt. The source of the oil was a bottle jack that had tipped over in the bed of his truck and leaked oil, which dripped onto the dirt.</p> <p>The truck was inspected prior to starting work by the contractor and found the truck satisfactory to conduct work.</p>	Hydraulic Oil	2 ounces	<p>Notification was made to onsite compliance personnel. Impacted soil (about 2 gallons) was removed and containerized in a 5-gallon bucket with lid. The bucket was labeled (accumulation) and transported to the MW-20 Bench facility. The waste was picked up in the next standard milk run and disposed offsite.</p>	<p>The root cause was determined to be inadequate tool/equipment. The service truck driver should have properly secured his bottle jack that was in the bed of his truck.</p> <p>The corrective action is the service truck properly secured the jack to his truck.</p>
4/3/2023	ER-4	<p>Upon returning from deconning drilling equipment, the drill crew discovered the freshwater hose filling the drill rig tank was left-on and overflowing onto the drill pad. Freshwater was released onto plastic and subsequently spilled-</p>	Freshwater	100 gallons	<p>Notifications were made to PG&E and onsite compliance personnel. There was no standing water when compliance personnel arrived on scene. After drilling is complete at ER-4, the drill pad soil was removed and transported to the Soil</p>	<p>A summary email describing the incident, root cause, and corrective action was provided to the agencies on 4/11/2023.</p> <p>The root case was determined to be an external distraction that</p>

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
		<p>out into the larger drill pad area via a previously unobserved tear in the plastic. The extent of the release is limited to the drill pad (built to support the rig) and did not breach the line of BMPs (i.e., straw wattles).</p>			<p>Processing Yard for management per the SMP.</p>	<p>caused a failure to properly communicate that the water hose was actively filling the freshwater tank.</p> <p>The drill crew and the geologist discussed greater effort on communication and division of tasks at hand to ensure that all project elements are accounted for. Furthermore, In the event that a tank is being filled, one member of the team will be identified to have the sole responsibility to monitor that tank until it is full.</p>
<p>2/18/2023</p>	<p>MW-20 Bench, north of the frac tanks secondary containment structure</p>	<p>An automated valve had closed, dead-heading an operating submersible pump in IRZ-15 which led to a gasket on a flange connection discharging spray.</p>	<p>Backwash water from IRZ-15</p>	<p>500 gallons (100 gallons sprayed outside of the containment structure, 400 gallons were inside the structure)</p>	<p>The released water inside the secondary containment structure was pumped into the frac tanks for processing through the Remedy-produced Water Conditioning Tank Farm.</p> <p>No standing water was observed by O&M personnel arrived on-scene on 2/18/23.</p> <p>A sample of the backwash water was immediately collected to determine next steps for soil cleanup. Results of the released water discussed with regulatory agencies on 2/28/23, showed concentrations of Cr at 73 ug/L or ppb, Cr6 at 68 ppb, Arsenic below reporting limit of 0.1 ppb, and low levels of COPCs (Selenium, Molybdenum).</p> <p>Due to the low levels of contaminants in the released water, the ongoing IRZ O&M activities at the MW-20 Bench, and the MW-20 Bench designation as an Area of Concern (AOC) in the RFI/RI, PG&E recommended no soil cleanup action for this release at this time.</p>	<p>An incident report was submitted to the agencies on 3/1/2023. The report outlined the following corrective actions taken to prevent reoccurrence:</p> <p>Several changes to the logic of the system operations were completed or confirmed for all IRZ wells, including:</p> <ul style="list-style-type: none"> • Prevent operation of all injection well backwash pumps when FCV-IRZ00-628Q is closed. • Prevent operation of all injection well backwash pumps if PLC communications are disabled. • Prevent operation of all injection well backwash pumps if the T-IRZ00-0621 tank level is high, or if the LE/LT-IRZ00-0658 level transmitter is faulted.

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
11/23/2022	IRZ-23 Well Vault	A pipe flange broke in the IRZ-23 well vault causing extracted groundwater from IRZ-9 and IRZ-13 to accumulate in the vault. The system alarm programming shut down the IRZ system, as water reached a high level mark in the vault. The Operator bypassed the alarms, which re-started the system, causing the extracted groundwater to overflow from the IRZ-23 well vault and onto ground.	Untreated groundwater from IRZ-9 and IRZ-13	1,400 gallons	Proposed surface soil sample locations were submitted to the agencies on 11/29/22 to assist in decision making regarding cleanup. After receipt of the Bureau of Reclamation (BOR)'s concurrence on 11/30/22, soil samples were collected on 12/2/22 and submitted to the laboratory. BOR is the landowner where the release occurred. A summary of the soil sampling results and a comparison to background and baseline soil data were provided and discussed with regulatory agencies on 1/10/23. Based on data and the comparative analysis, PG&E recommended that no further action is necessary for the release. BOR provided concurrence on 1/10/23. DTSC provided a conditional concurrence on 1/13/23. DOI provided concurrence on 1/17/23.	An incident report was provided to the agencies on 12/22/2022. The existing SOP was updated to include additional details on communication protocols and operational procedures for post-alarm startup and operation of the IRZ system. Operators was trained on the updated SOP on 12/13/22.
9/2/2022	FW-02B	While backfilling at FW-02B, the seal on the mud tub broke releasing drilling and purge water onto secondary containment (plastic) and the ground (mostly on the drilling pad and a minor amount onto the ground about 2 feet south of the drilling pad).	Drilling wastewater	About 2 gallons	About 2 gallons of wet soil outside of the drill pad was removed and put into the FW-02 drilling soil bin. The wet soil on the pad was not removed since this pad was built up for the dual rotary rig	During morning rig inspections of the mud tub, the mud tub seal around the conductor casing will similarly be inspected. In the event that the seal is seen as compromised (cracks, material is beginning to look dry), a stop work will be utilized, the lead driller will be alerted and additional bentonite chips will be used to reinforce the mud tub seal.
7/22/2022	TCS-2	While lifting a soil bin onto a transport truck, some water inside the bin spilled onto the plastic containment below and splashed onto nearby equipment.	Drilling wastewater	Minimal	The contractor removed all wet areas visible on the ground and cleaned up the affected equipment. The affected soil was put into the soil bin.	Soil bins will be inspected prior to lifting onto truck. If water is present and has a potential to spill outside of the bin, the water will be removed prior to lifting the bin.

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
5/11/2022	Floodplain at C9 north, near 12-kV electrical vault	A dump truck hauling soil for the revegetation project made a U-turn near the C9 North area and bumped into the 12-kV electrical vault. The truck diesel tank leaked and spilled diesel fuel on the ground and into the electrical vault.	Diesel fuel	15 gallons	<p>About 8 cubic yards of impacted soil was excavated and contained in 39 55-gallon drums. The drums were picked up for offsite disposal. A confirmation soil sample was collected close to the southeast corner of the 12-kv electrical vault where most of the impacted soil was removed for TPH analysis. TPH results are below soil management screening levels. Based on lab results, the excavated area was backfilled with soil from the SPY.</p> <p>Once the impacted soil was removed, the inside of the electrical vault was inspected. A diesel sheen was observed on top of existing water inside the vault. An approximate 200 gallons of water/diesel was removed from the electrical vault and contained in four 55-gallon drums. The drums were picked up for offsite disposal.</p>	<p>An incident report was provided to the agencies on 5/17/2022.</p> <p>Traffic delineators and red rope were placed across the road to prevent traffic from trying to turn around at the end of the road. The project team's daily tailboard meetings will continue to include reminders and discussion on designated work areas and egress and regress areas and a description of delineation (wattles, tape, cones, ropes, etc.) for areas not to enter.</p>
5/4/2022	ER-2	A hydraulic line ruptured during drilling at the ER-2 location (on the Refuge) and due to high winds at the time, hydraulic fluid sprayed droplets on field crew, equipment, nearby creosote plants, wooden rails, temporary water line, and the ground	Hydraulic fluid	Unknown	Impacted area (nearby bluff, ground) and creosote plants were decontaminated/ sprayed with Simple Green. Oil spots on the temporary water line was wiped down.	The crew will add a better protective spiral or rubber wrap that fits tighter to the hose. This type of wrap is thicker than the current cloth wrap, will give better protection, and allow for easier visual inspection of normal wear and tear.
4/26/2022	Transwestern Bench	Drilling wastewater stored in frac tank leaked onto the tank's containment. Water in contained released onto ground through pin holes in the containment.	Drilling wastewater	Three gallons	Impacted soil was removed when the leaked tank and containment were removed.	Inspection of tanks and liners prior to putting them into service.
3/23/2022	TWB-2	A hydraulic line broke during the process of retrieving stuck drill casing from the borehole and hydraulic fluid leaked onto the soil	Hydraulic fluid	1/4 cup	Stained gravel removed and fluid in mud tub soaked up with absorbent pads and all placed into 5 gallon bucket. The bucket was taken to IM3 for pickup in next milk run.	

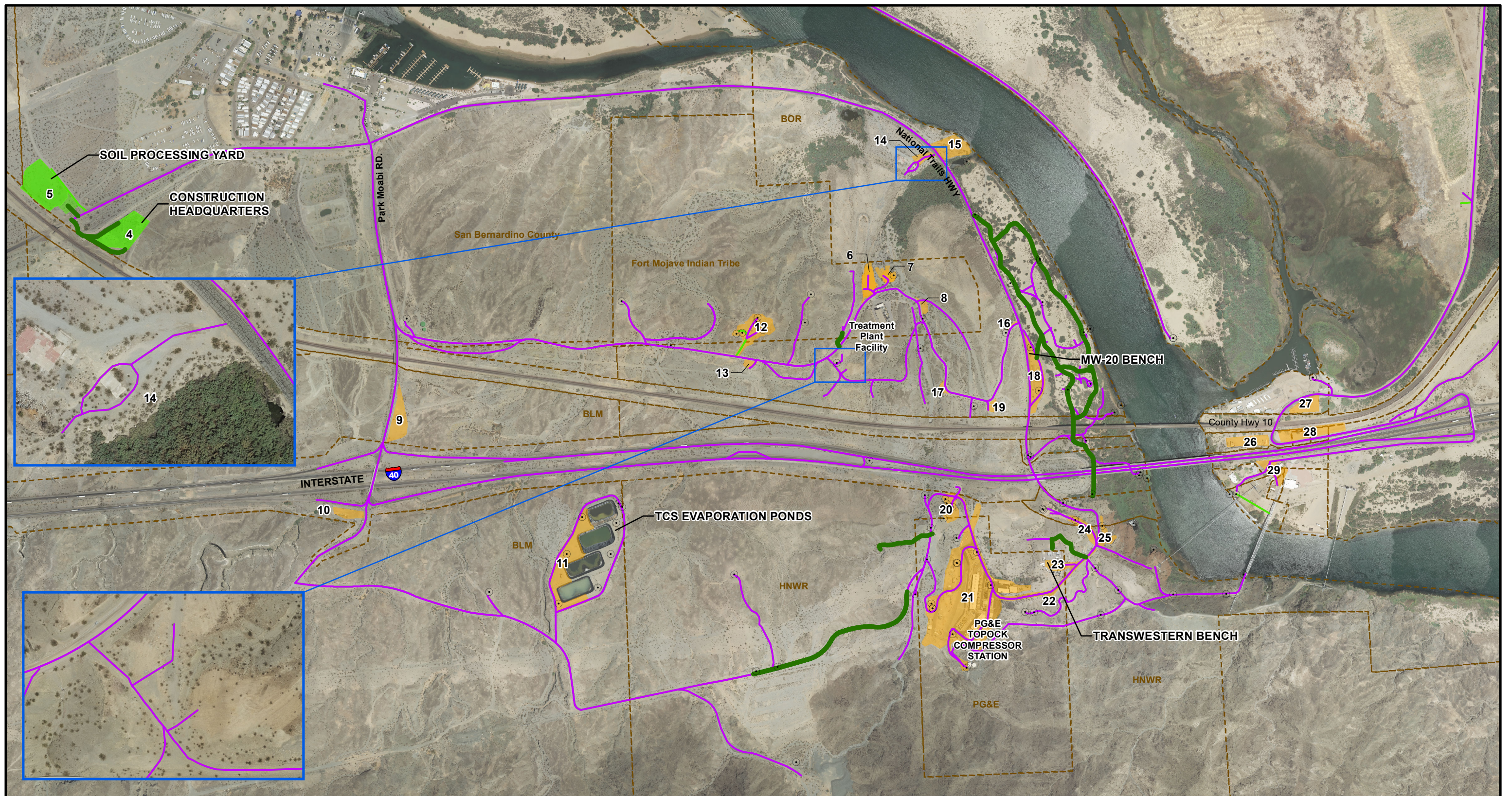
Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
		hopper, mud tub, and well casing, as well as surrounding ground.				
6/29/2021	NTH	Diesel fuel leaked from a fuel cap on a water truck while on NTH	Diesel	Not available	Approximately two 5-gallon buckets of impacted soil was removed and brought to SPY.	Reviewed fueling procedures with crew.
6/22/2021	MW-20 Bench	Antifreeze leak from skid steer	Antifreeze	Not available	Affected soil was removed and placed in buckets and brought to SPY.	
6/14/2021	IRZ-39 well vault	Extracted groundwater from TW-01 released onto ground during startup of the aquifer test.	TW-01	A few hundred gallons	TW-1 data showed 1400ppb of Cr6. Impacted soil was excavated and placed on plastic. Sample submitted for lab.	Test suspended and quality control review conducted.
7/11/2020 to 7/12/2020	C19 staging area	Grease melted from an arm knuckle of a backhoe and onto the ground	Grease	Not available	Less than 10 ounces of impacted soil was removed and taken to IM-3 for pickup in next milk run.	
7/1/2020	Pipeline J	Concrete washout water leaked from containment and released onto ground.	Concrete wash out water	Not available	About 1/2 cubic yard of impacted soil removed and transported to SPY for classification per SMP.	Use new plastic.
6/16/2020	MW-20 Bench	Fuel leaked from a fuel cap of a construction vehicle, that was not tightened correctly.	Fuel	Not available	Impacted soil was removed/placed in a 5-gallon bucket and taken to IM-3 for pickup in next milk run.	Proper fueling procedures discussed with subcontractor.
6/8/2020	MW-20 Bench	Cutting oil inside the electrician's conex box flowed out and dripped to the ground. No containment was present beneath the cutting machine.	Cutting oil	3 to 4 ounces	About 2 pounds of impacted soil was removed and taken to IM-3 for pickup in next milk run.	Cutting machine placed on containment.
5/15/2020	MW-20 Bench	Antifreeze released from a forklift onto ground.	Antifreeze	2 ounces	Impacted rocks were removed.	Heavy equipment inspection checklist emphasized and reviewed with team.
2/21/2020	Bat Cave Wash access road	Hydraulic oil leaked from vehicle on access road to Bat Cave Wash.	Hydraulic fluid	Several drops	Impacted soil removed and taken to IM-3 for pickup in next milk run.	Truck removed from site. PG&E brought on board 3rd party inspector following week to perform thorough inspections of each heavy duty vehicle on site.

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
2/20/2020	SPY	Antifreeze/water released from a passenger vehicle parked at the SPY.	Antifreeze/water	Not available	Impacted rocks (5-gallon) removed and disposed offsite.	Vehicle removed from project site. PG&E ordered all vehicles to stop for physical inspections.
2/18/2020	Pipeline B access road	Hydraulic oil leak occurred from the engine bay of a pickup truck.	Hydraulic fluid	Not available	Impacted soil removed and taken to IM-3 for pickup in next milk run.	Discussion with team about proper inspection of site pickup trucks.
2/6/2020	MW-20 Bench	Freshwater released onto ground during a water transfer operation	Freshwater	5 gallons	Impacted soil left in place.	Discussion with team about opening overflow valve and monitor the spill bucket from the overflow valve on the water truck tank as a visual indicator that the tank is full.
1/9/2020	MW-20 Bench	Wastewater leaked from a valve during transfer operation, and onto ground.	Drilling wastewater	1/4 gallon	Impacted soil removed and placed into drilling spoil bin.	Containment and absorbent pads placed under leaky valve, main valve to tank closed, and the line was pumped off. Valve relocated to within containment and tightened.
1/9/2020	Pipeline B	Hydraulic oil leaked from hydraulic hammer onto ground.	Hydraulic fluid	3 drops	Cleanup of impacted rocks (6 rocks) performed under TCS direction and given to TCS for disposal.	Reminder of situation awareness that allowed team to catch leak early.
12/12/2019	Pipeline C7	Fuel leaked from a fuel cap of a front end loader that was not tightened correctly.	Fuel	Not available	Impacted soil removed and placed in three 55 gallon drums. Drums taken to IM-3 for disposal with milk run.	Retraining of personnel on post fueling equipment inspections.
11/2/2019	MW-Y	Hydraulic line ruptured during placement of stabilizing mats.	Hydraulic oil	Not available	Impacted sand was removed and taken to IM-3.	
9/27/2019	Pipeline B	Hydraulic oil leaked from pickup truck.	Hydraulic oil	2 ounces	Impacted soil was removed and taken to IM-3 for pickup in next milk run.	
9/20/2019	Floodplain access road from RB-5 to RB-2	Leak from construction truck	Hydraulic oil	3 to 4 ounces	Approximately 4 cubic feet of impacted sand and absorbent pads were placed in a bucket and taken to IM-3 for pickup in next milk run.	Inspect work area before leaving area.
9/11/2019	Northern fence line of CHQ	A loose seal on the hydraulic cylinder that raises/lowers the dump bed caused a hydraulic oil leak onto ground.	Hydraulic oil	3 to 5 ounces	One 5-gallon of impacted rocks were collected and took to IM3 for pickup by next milk run.	Reviewed BMP with crew in tailboard.

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
9/6/2019	Pipeline B	Hydraulic oil leaked from excavator.	Hydraulic oil	2 to 4 ounces	Impacted soil removed and taken to IM3 for pick up by next milk run.	
8/27/2019	RB-3	Wastewater leaked into containment during water transfer operation. Water released onto ground from a separation between two fiber rolls in the containment wall.	A mixture of freshwater and aquifer water	5 gallons	Impacted sand left in place.	Fiber rolls reinstalled without gap. Stand down with crew to emphasis BMPs and SWPPP refresher.
8/7/2019	RB-4	The metal band that secured the fitting inside a discharge hose leaked onto ground. The hose was part of the wastewater service line for the river bank wells.	A mixture of freshwater and aquifer water	0.5 gallons	Impacted sand left in place.	Installed catch/spill containment to encompass all hose connections and fittings at the connection points. Tee installed to discharge hose to connect at 90 degree angle instead of 180.
5/31/2019	Floodplain	Hydraulic hose on a backhoe ruptured resulting in oil on the ground.	Hydraulic fluid	12 ounces	Area cleaned with absorbent pads and approximately 0.4 gallon of impacted sand was removed/placed in bucket. The bucket was taken to IM3 for pick up by next milk run.	Equipment taken out of service and repaired
5/29/2019	MW-20 Bench	Wastewater from a storage frac tank leaked into the tank containment, and then onto the ground because part of the containment had collapsed.	Drilling wastewater	200 gallons	Cr6 test at IM3, result was 8.1 ppb. Impacted soil left in place.	An incident report was provided to the regulatory agencies on 6/4/2019. Notified subcontractors that no one is to adjust or remove piping and hose manifolds. Regular inspections to be conducted. A pipe rack will be used for better housekeeping of hoses.
4/11/2019	MW-20 Bench	Wastewater storage frac tank overtopped during water transfer operation.	Drilling wastewater	5 to 10 gallons	Cr6 tested at IM3, result was ND. Soil left in place.	Better coordination with well construction support team and water level will be measured using water level tube.
4/9/2019	IRZ-20	A "blowout" occurred where water in the borehole discharged out the annular space, and onto ground.	Mixture of freshwater and aquifer water	20 gallons	Cr6 tested at IM3, result was ND. Impacted soil left in place.	Drill methodology changed to avoid another "blowout".
2/27/2019	MW-N	Shifting ground weakened seal around mud tub, causing the seal	Mixture of freshwater and aquifer water	Not available	Approximately 10 gallons of impacted soil removed and placed into drilling spoil bin.	Site prep to include soil compaction before drilling. Seal

Date Release Identified	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
		to leak and release water onto the ground.				will be inspected during each day and upon setup.
2/27/2019	Floodplain	Hydraulic hose on a skid steer ruptured, resulting in oil on floodplain sand.	Hydraulic fluid	6 to 7 ounces	An approximate 2 square shovels with 3/4 full of impacted sand was removed and placed into a 5 gallon bucket. The 5-gallon bucket was taken to IM3 for pick up by next milk run.	Continue to do inspection of equipment prior to use.
1/10/2019	Access dirt road east of SPY	Hydraulic hose ruptured at the rear of a roll off truck (during a lift), resulting in hydraulic fluid contacting surface soil.	Hydraulic fluid	1/2 pint	About 1.5 gallon of impacted soil was removed and taken to IM3 for pickup by next milk run.	
10/10/2018	MW-L	Pressure from the drilling activity caused aquifer/ freshwater water to push up, around the casing and the seal causing a release.	Mixture of freshwater and aquifer water	1 to 2 gallons	About .05 gallon of impacted soil was removed and placed into drilling spoil bin.	Moving forward bentonite will be used in the hole created by hand clearing for utilities and a 7-inch conductor casing will be drilled through the bentonite to create a tight seal.
10/8/2018	MW-L	Weight of drill mud tub and drilling activity caused the ground to cave in, which formed a void. Shifting ground made the seal weak causing the seal to leak, causing a release onto ground.	Mixture of freshwater and aquifer water	2 gallons	Three 5-gallon buckets of impacted soil was removed and placed into drilling spoil bin.	More thorough inspections of seal on mud tub

Figures



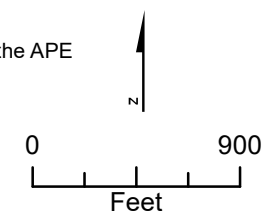
LEGEND

- Existing Access Route (will continue to be used for remedial activities)
- Existing Route (to be used as is for access to remedial activities)
- Roads to be improved or constructed for groundwater remedy
- Soil Processing (Area #5) and Construction Headquarters (Area #4) for Remediation Project
- Staging Areas for Remediation Project
- 5 Area # referenced in the Notes

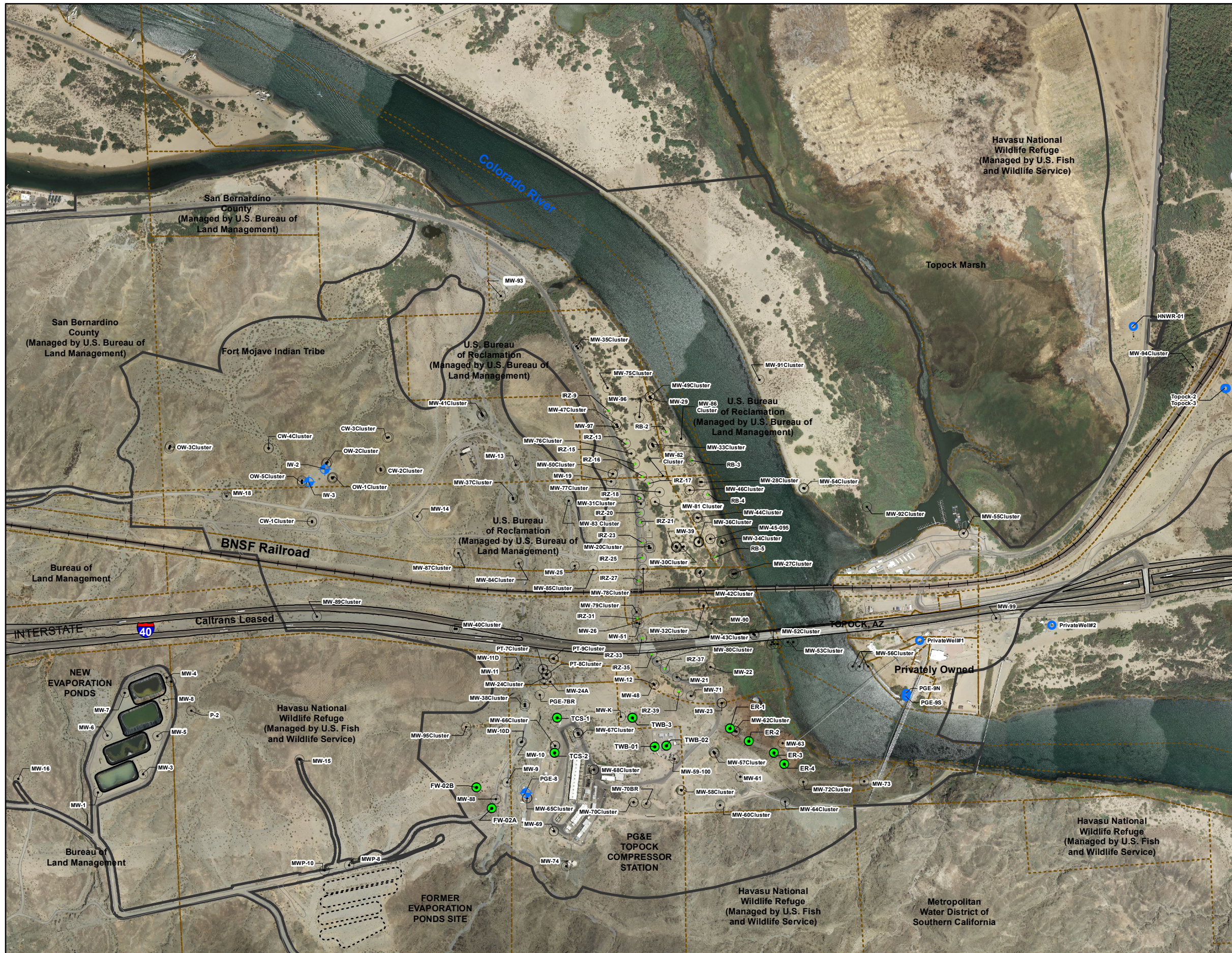
Notes:

1. Decontamination pads will be located in Area #21 (Topock Compressor Station), and Area #23 (Transwestern Bench).
2. Areas #15, 16, 17, 19, and 20 will not be used as staging areas. Areas #16, 17, and 19 may be part of the primary work zones for remedy infrastructure along the access road.
3. Area #20 may be part of the primary work zone for installation of future provisional well IRL-6 (if determined to be needed in the future) and associated piping/concrete/vault.

4. Public roadways outside of the EIR project area and the APE can also be used for remedy implementation.



**FIGURE 2-1
CONSTRUCTION SITE PLAN
AND ACCESS ROUTES**
GROUNDWATER REMEDY PHASE 1 CONSTRUCTION
PG&E TOPOCK COMPRESSOR STATION
NEEDLES, CALIFORNIA



- LEGEND
- Project Area
 - Phase 2A Well
 - + Injection Well
 - Groundwater Monitoring Well
 - Water Supply Well
 - Remediation Well

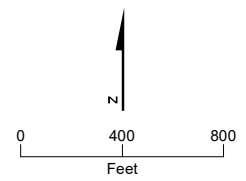


Figure 2-2
Well Locations
 Groundwater Remedy Construction
 PG&E Topock Compressor Station
 Needles, California

Attachments

The following attachments did not have any updates, and are not included in this monthly report:

- A. Photographs
- B. Available Boring and Well Construction Logs, Groundwater Sample Results from Well Drilling, and Well Testing Activities
- C. Soil Sampling Locations and Available Soil Analytical Results
- D. Perimeter Air Sampling Analytical Results
- E. Noise Monitoring Results (SEIR-2 and 3 Requirements)

Attachment F
Six-Week Look-Ahead Schedule

Six-Week Look-Ahead Schedule
 PG&E Topock Compressor Station Remedial Activities

Activity	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Primary Planned Activities	3/2/2025	3/3/2025	3/4/2025	3/5/2025	3/6/2025	3/7/2025	3/8/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3* , F3* , E4* , F4* , G4* , D5* , E5* , F5* , G5* , D6* , E6* , F6* , & G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Construction E4*	No Work	No Work	No Work	No Work	Pre-Work Field Review for IRL-2, IRL-3, and MW-I Site Preparation	No Work	No Work
Site Wide Revegetation F5* , F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	3/9/2025	3/10/2025	3/11/2025	3/12/2025	3/13/2025	3/14/2025	3/15/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3* , F3* , E4* , F4* , G4* , D5* , E5* , F5* , G5* , D6* , E6* , F6* , & G6*	No Work	Monthly sampling and transducer downloads	Monthly sampling and transducer downloads	Monthly sampling and transducer downloads	Monthly sampling and transducer downloads	Monthly sampling and transducer downloads	No Work
Site Wide Construction E4*	No Work	No Work	GeoVision - Utility Locates for IRL-2, -3, -4, MW-I	GeoVision - Utility Locates for IRL-2, -3, -4, MW-I	No Work	No Work	No Work
Site Wide Revegetation F5* , F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	3/16/2025	3/17/2025	3/18/2025	3/19/2025	3/20/2025	3/21/2025	3/22/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3* , F3* , E4* , F4* , G4* , D5* , E5* , F5* , G5* , D6* , E6* , F6* , & G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Construction E4*	No Work	IRL-2, IRL-3, and MW-I Mobilization and Site Preparation	IRL-2, IRL-3, and MW-I Mobilization and Site Preparation	IRL-2, IRL-3, and MW-I Mobilization and Site Preparation	IRL-2, IRL-3, and MW-I Mobilization and Site Preparation	IRL-2, IRL-3, and MW-I Mobilization and Site Preparation	No Work
Site Wide Revegetation F5* , F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	3/23/2025	3/24/2025	3/25/2025	3/26/2025	3/27/2025	3/28/2025	3/29/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3* , F3* , E4* , F4* , G4* , D5* , E5* , F5* , G5* , D6* , E6* , F6* , & G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Construction E4*	No Work	No Work	^IRL-3 and IRL-2 Drilling Site and Road Preparation	^IRL-3 and IRL-2 Drilling Site and Road Preparation	^IRL-3 and IRL-2 Drilling Site and Road Preparation	^IRL-3 and IRL-2 Drilling Site and Road Preparation	^IRL-3 and IRL-2 Drilling Site and Road Preparation
Site Wide Revegetation F5* , F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	3/30/2025	3/31/2025	4/1/2025	4/2/2025	4/3/2025	4/4/2025	4/5/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3* , F3* , E4* , F4* , G4* , D5* , E5* , F5* , G5* , D6* , E6* , F6* , & G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Construction E4*	^IRL-3 and IRL-2 Drilling Site and Road Preparation	^IRL-3 and IRL-2 Drilling Site and Road Preparation, Air Knifing IRL-2 and MW-I	^IRL-3 and IRL-2 Drilling Site and Road Preparation, Air Knifing IRL-3	^IRL-3 and IRL-2 Drilling Site and Road Preparation	^IRL-3 and IRL-2 Drilling Site and Road Preparation	No Work	No Work
Site Wide Revegetation F5* , F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work
Primary Planned Activities	4/6/2025	4/7/2025	4/8/2025	4/9/2025	4/10/2025	4/11/2025	4/12/2025
Start Time (PST)	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM	6:00 AM
Site Wide Groundwater Sampling G3* , F3* , E4* , F4* , G4* , D5* , E5* , F5* , G5* , D6* , E6* , F6* , & G6*	No Work	No Work	No Work	No Work	No Work	No Work	No Work
Site Wide Construction E4*	No Work	No Work	^IRL-2 and MW-I Drilling Site and Road Preparation, Sonic Rig Inspections, IRL-3 Site Setup	^IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Site Setup and Drilling	^IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Drilling	^IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Drilling	^IRL-2 and MW-I Drilling Site and Road Preparation, IRL-3 Drilling
Site Wide Revegetation F5* , F6*	No Work	No Work	No Work	No Work	Irrigation O&M	No Work	No Work

Note: The Pre-Work Field Review was formerly known as the Last Look

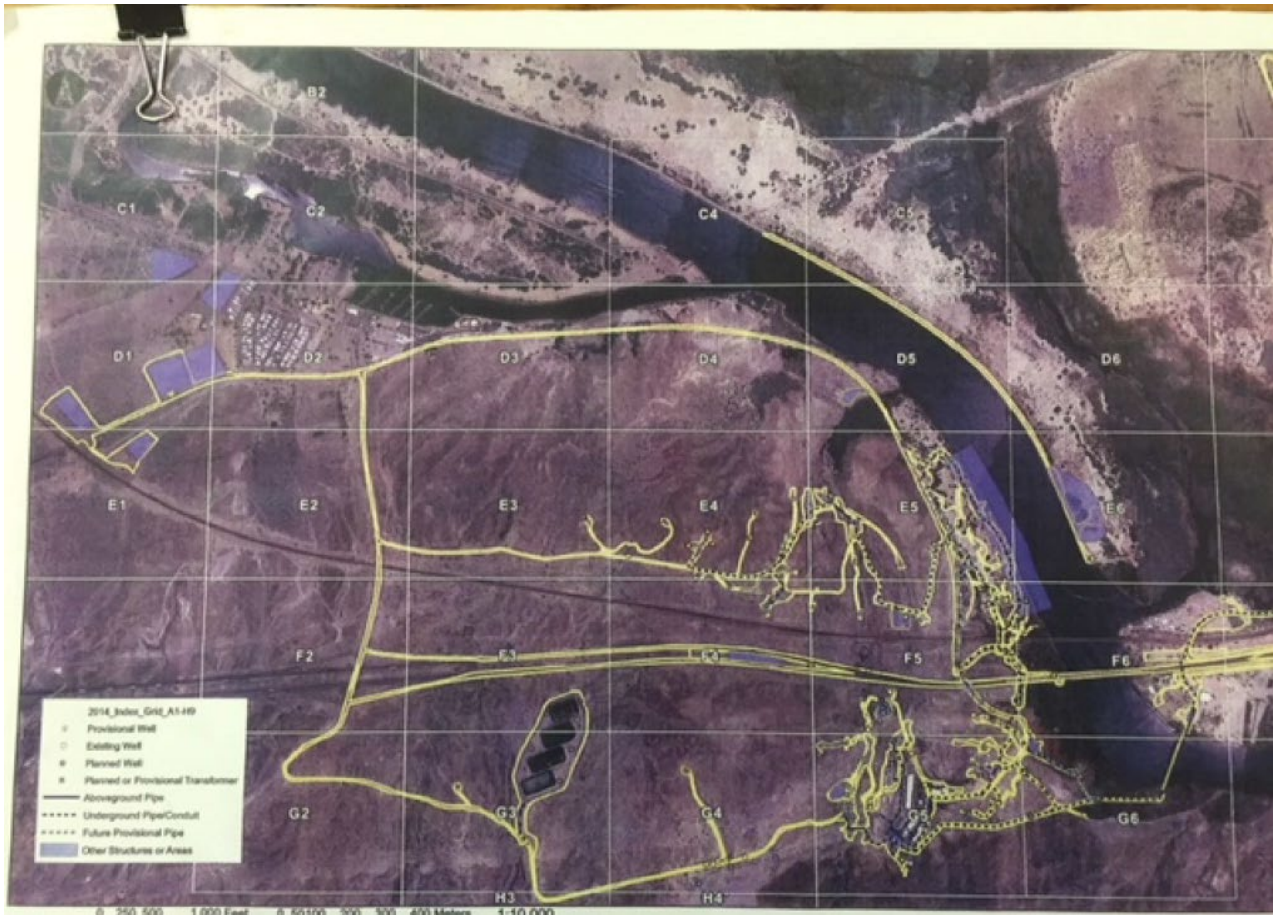


Figure showing a grid superimposed on the Topock site map. Each grid position is denoted by an letter followed by a number.

Attachment G
Groundwater Monitoring Data (DTSC
Condition of Approval xi)

(Groundwater Data Presented in Separate PDF)