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June 10, 2026

Ms. Veronica Dickerson, RSO
Environmental Compliance and Cleanup Division
Office of Environmental Policy and Compliance (OEPC)
US Department of Interior

Mr. Christopher Ioan
California Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

Subject: **May 2026 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California**
(Document ID: TPK_Monthly_Progress_Rpt_May_2026_20260610)

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 May 2026, as well as activities planned for the next six weeks (May 31 to July 11, 2026), 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 92nd monthly progress report. Please contact me at (442) 214-5911 if you have any questions or comments regarding this submittal.

Sincerely,

Scott Graunke

Scott Graunke
Topock Site Project Manager

Topock Project Executive Abstract

Document Title: *May 2026 Monthly Progress Report for the Groundwater Remedy Construction and Startup, PG&E Topock Compressor Station, Needles, California* Submitting Agency: DOI, DTSC Final Document? X Yes __ No	Date of Document: 06/10/2026 Who Created this Document? (i.e. PG&E, DTSC, DOI, Other) PG&E
Priority Status: __ HIGH __ MED X LOW	Is this time critical? __ Yes X No
Type of Document: __ Draft X Report __ Letter __ Memo __ Other / Explain:	Action Required: X Information Only __Review and Input __ Other / Explain:
What does this information pertain to? __ Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA)/Preliminary Assessment (PA) __ RCRA Facility Investigation (RFI)/Remedial Investigation (including Risk Assessment) __ Corrective Measures Study (CMS)/Feasibility Study (FS) X Corrective Measures Implementation/Remedial Action (RA) __ California Environmental Quality Act/ Environmental Impact Report (EIR) __ Interim Measures __ Other / Explain:	Is this a Regulatory Requirement? X Yes __ No If no, why is the document needed?
What is the consequence of NOT doing this item? What is the consequence of DOING this item? 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).	Other Justification/s: __ Permit __ Other / Explain:

Brief Summary of attached document:

This monthly report describes activities taken in May 2026 as well as activities planned for the next six weeks (May 31 to July 11, 2026) 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 *Construction/ Remedial Action Work Plan* (C/RAWP), 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.

Written by: Pacific Gas and Electric Company

Recommendations:

Provide input to PG&E.

How is this information related to the Final Remedy or Regulatory Requirements:

This submittal is required in compliance with the CACA, CD, and pursuant to the C/RAWP.

Other requirements of this information?

None.

JACOBS

May 2026
Monthly Progress Report for the Final Groundwater Remedy Construction and Startup

PG&E Topock Compressor Station
Needles, California

Document ID: TPK_Monthly_Progress_Rpt_May_20260610

June 2026

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

On Behalf of
Pacific Gas and Electric Company

Contents[1]

Tables

Figures

Attachments

[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
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
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
RPWCP	Remedy-Produced Water Conditioning Plant
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 require 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 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 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 92nd 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 May 2026 and follows the content and format described in Exhibit 2.6-2 of the approved C/RAWP. The report is 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 had no changes since last reporting period will not appear in the body of the report. This abbreviated reporting format has been implemented since 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

In May 2026, PG&E performed the following construction activities (note that Figures 2-1 and 2-2 show the construction access routes/staging areas and Phase 2b wells, respectively, and Table 2-2 presents the changes in well nomenclature):

- **Attachment A** includes selected photos of activities during this reporting period. **Attachment B** includes available vertical aquifer sample results during well drilling.
- 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 May 31, 2026, a total of 407 six-week look-ahead schedule emails have been sent. Of those, five six-week look-ahead schedule emails were sent in May 2026 (on May 3, 10, 17, 24, and 31).
- On August 10, 2018, PG&E issued the first Environmental Release to Construct (ERTC) to contractors. As of May 31, 2026, a total of 129 ERTCs (including addenda) and 12 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.
    - Although no new ERTC was issued in May 2026, the ERTC #31 figure was revised and re-issued on May 20, 2026, to reflect a small change to the work area boundary, specifically at the southwest corner of the bench.
- 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. Eighteen daily activity lists were issued in May 2026.
- In May 2026, the following remedy construction and O&M activities were scheduled:
    - April 22 to May 2 activities**:**
        - Continued IRZ circulation and ethanol injection O&M activities, including reveg and O&M support activities (e.g., irrigation, plant watering, etc.). 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.
        - Began sitewide PFAS monthly sampling.
        - Continued IRL-04 well drilling.
        - Continued IRL-01 development.

  - Continued Pipeline B I-40 jack and bore construction.
  - Continued FW-01 section A pipeline installation.

- May 3 to 9 activities:
  - Continued IRZ circulation and ethanol injection O&M activities, including reveg and O&M support activities (e.g., irrigation, plant watering, etc.). See example O&M activities in the first bullet above.
  - Began IRL-03 development, mobilization, and site setup.
  - Continued IRL-04 well drilling.
  - Continued IRL-01 development.
  - Continued Pipeline B I-40 jack and bore construction.
  - Continued FW-01 section A pipeline installation.
  - Completed Transwestern Bench RPWCP pre-work field review.
- May 10 to 16 activities:
  - Continued IRZ circulation and ethanol injection O&M activities, including reveg and O&M support activities (e.g., irrigation, plant watering, etc.). See example O&M activities in the first bullet above.
  - Began monthly groundwater sampling activities sitewide.
  - Continued IRL-04 well drilling.
  - Continued IRL-03 development.
  - Completed I-40 jack and bore construction.
  - Completed FW-01 section A pipeline installation.
  - Began Transwestern Bench site preparation and concrete pad removal.
  - Began MW-20 bench electrical.
- May 17 to 23 activities:
  - Continued IRZ circulation and ethanol injection O&M activities, , including reveg and O&M support activities (e.g., irrigation, plant watering, etc.). See example O&M activities in the first bullet above.
  - Continued groundwater monitoring including ponds, hydro6, and river sampling.
  - Continued IRL-04 well drilling.
  - Continued IRL-03 development.
  - Continued Transwestern Bench site preparation and concrete pad removal.
  - Completed MW-20 bench electrical.
- May 24 to May 30 activities:
  - Continued IRZ circulation and ethanol injection O&M activities, , including reveg and O&M support activities (e.g., irrigation, plant watering, etc.). See example O&M activities in the first bullet above.
  - Completed monthly grounwater monitoring including quarterly and MW-15 sampling.
  - Continued IRL-04 well drilling.
  - Continued IRL-03 development.
  - Continued Transwestern Bench site preparation and concrete pad removal.

- May 31 to June 6 activities**:**

  - Continued IRZ circulation and ethanol injection O&M activities, , including reveg and O&M support activities (e.g., irrigation, plant watering, etc.). See example O&M activities in the first bullet above.
  - Continued IRL-04 well drilling.
  - Continued IRL-03 development.
  - Continued Transwestern Bench site preparation and concrete pad removal.
  - Began Pipeline E installation.

- Remedy Baseline/Opportunistic Soil Sampling:

  No baseline or opportunistic soil sampling was conducted in May 2026. **Attachment C** contains information about soil sampling locations and soil analytical results that are available at this time

– Fugitive Dust Monitoring (the following are highlights; details are in **Attachment D**):

  - Daily observations for fugitive dust were made during periodic inspection of construction activities. No visible dust was observed outside of the upland work areas in May 2026.
  - Two Aeroquals continuous dust monitors are located at the SPY. Temporary exceedance of the 100 micrograms per cubic meter ($\mu g/m^3$) threshold occurred on 5/7, 5/9, 5/27, 5/28 at the northern Aeroqual. These exceedances occurred during working hours, and are caused by construction traffic through the SPY. Compliance personnel requested additional water applications within the SPY to control fugitive dust.
  - Starting May 18, 2026, three Aeroquals continuous dust monitors are located at the Transwestern Bench (TWB). Temporary exceedances of the 100 micrograms per cubic meter ($\mu g/m^3$) threshold occurred on 5/18, 5/19, and 5/20 during the removal of the eco blocks and the office trailer. One temporary exceedance of the threshold occurred on 5/29 during the removal of the concrete decon pad. Additional water was applied to minimize fugitive dust.

    In addition, one air sampling event was conducted on May 28, 2026 (for Cr6) during the removal of the TWB decon pad and one air sampling event was conducted on May 30, 2026 (for Cr6 and Dioxins/Furans) during the removal of the concrete pad on the northwest corner of the TWB.
  - For brevity, starting with the May 2026 Monthly Progress Report, Tables D-1a and D-1b of **Attachment D** present all analytical results from air sampling events conducted during Phase 2b remedy construction available at this time. Analytical results from air sampling events conducted during Phase 1 and 2a remedy construction are available in the February 2022 and February 2024 Monthly Progress Reports, respectively.

– Noise Monitoring (the following are highlights; details are in **Attachment E**):

  In May 2026, the following monitoring events were conducted:

  - Seven events at the pre-approved location west of the mobile home park at Moabi Regional Park. Construction activities closest to this monitoring location include soil management activities at the SPY and Construction Headquarters (CHQ), as well as traffic on NTH. The sound level typically varied between 38 and 60 dBA, with an average and median of 45-47 dBA.
  - Five events at the pre-approved location near and at the same elevation as Maze C. Construction activities closest to this monitoring location are associated with well drilling/ development in the upland and well support activities at Staging Area 6, as well as drilling at IRL-04 and development at IRL-03. The sound level typically varied between 42 and 54 dBA, with an average and median of 48 dBA.

2.2 Freshwater Usage, Waste Generation, and Management

In May 2026, freshwater usage, waste generation, and management as provided by contractors are as follows:

2.2.1 Freshwater and Wastewater

- In May 2026, an approximate total of 2,050 gallons of freshwater were used for IRZ well rehabilitation, 1,674 gallons were used for O&M activities in the revegetation areas, 491,800 gallons for well drilling and drilling support, and 40,000 gallons for remedy construction.
- Freshwater usage from remedy construction for April 2026 was 86,000 gallons.
- For the reporting period, an estimated 111,900 gallons of remedy-produced water (after conditioning) were 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.
- In May 2026, an approximate 42,600 gallons of drilling wastewater was disposed at PG&E TCS evaporation ponds.
- To date, there has been no offsite disposal of remedy-produced water generated from O&M activities.

2.2.2 Displaced Materials/Soils/Clay/Sludge

- Since the start of Phase 2b remedy construction in late March 2025, an approximate 6,202 cubic yards of excess soils/materials (excluding spills/releases) were generated from construction activities. Of those, in May 2026, about 26 cubic yards were generated from well drilling and 495 cubic yards were generated from I-40 jack and bore.
- Excess soils/materials data from remedy construction for April 2026 was 360 cubic yards.

2.2.3 General Construction Waste, Sanitary Waste, and Recyclables

- In May 2026, approximately 21.5 cubic yards of general waste was generated and hauled to local landfills.
- General waste data from remedy construction for April 2026 was 20 cubic yards.
- Sanitary waste from construction trailers/portable toilets is hauled offsite as needed.

2.3 Worker Training and Education

- In May 2026, 7 safety training sessions were held and a total of 12 personnel trained. In addition, a total of 14 personnel took the WEAT.

2.4 Status of Work Variance Requests (WVRs)/Determination of Future Activity Allowance (FAA) Associated with WVRs

Table 2-3 includes information regarding activities related to approved and proposed WVRs (i.e., material deviations from the design documents, the C/RAWP, or other approved work plans), and agencies' actions on those requests, including DTSC's determination of Future Activity Allowance (FAA) associated with the WVRs.

- On May 6, 2026, PG&E submitted WVR #18 that incorporates FW-02B as a freshwater injection well in the groundwater remedy as directed by the Agencies on March 17, 2026. DTSC and DOI are reviewing WVR.

2.5 Status of Proposed Work Plans/Determination of Future Activity Allowance (FAA) Associated with Work Plans*

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 (May 31 to July 11, 2026) include the following:

- IRZ circulation and ethanol injection O&M activities, including revegetation and O&M support activities.
- Continuing IRL-04 well drilling.
- Continuing IRL-03 development.
- Continuing TWB site preparation and concrete pad removal.
- Continuing Pipeline E installation.
- Begin MW-38D development, mobilization, and site setup.
- Continuing HNWR-1A concrete pad.
- Begin IRL-02 drilling, mobilization, and site setup.
- Begin MW-35-39 and MW-T air knife.
- Conducted Pipeline A and H pre-work field review.
- Begin Pipeline A installation.
- Begin Flood Plain IRZ wells air knife.
- Begin FW-02 Alt. mobilization, site setup, and casing removal.
- MW-35-39 drilling, mobilization, and site setup.

Attachment F 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

Table 2-5 summarizes the percent completeness for key Phase 2b construction activities, as of May 31, 2026. In addition, the latest project schedule including remedy construction can be downloaded Monthly Progress Reports | Topock Remediation | PG&E on the project website.

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

At the request of DTSC, a summary of releases (or spills) that occurred outside of containment and onto ground is provided in Table 2-6. The summary provides information about each release including date, location of release, type of material released, amount of material released (if known), and associated cleanup activities.

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:

2-1b. Summary of Well Environmental Release-To-Constructions
2-1c. Summary of Environmental Release-To-Operates
2-2. Monitoring Wells Nomenclature Changes
2-4. Status of Work Variance Requests/Determination of FAA Associated with Work Plans

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

May 2026 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

ERTC Number[a]	Brief Description of Covered Areas and Scope of Authorized Activities	Original Issue Date
Amendment 1 to ERTC 17 [b,c]	Scope included fence installation and planting in the revegetation areas in the floodplain.	March 18, 2022
Amendment 2 to ERTC 17 [b,c]	Scope included fence installation and planting in the UHR-1 revegetation area, located right off National Trails Highway.	April 4, 2022
ERTC 18	Scope included remedy pipeline installation within TCS.	April 15, 2022
Addendum 1 to ERTC 18	Scope included remedy electrical work inside TCS.	December 7, 2022
Addendum 2 to ERTC 18	Scope included additional remedy electrical work inside TCS.	March 2, 2023
Addendum 3 to ERTC 18	Scope included asphalt repair/placement and retaining wall rebuild inside TCS and asphalt placement on access road just outside TCS.	April 7, 2023
ERTC 19	Scope included remedy pipeline I2 installation in Bat Cave Wash.	Renewed March 2, 2023 for storm damage repair work *(originally issued on July 15, 2022)*
Addendum 1 to ERTC 19	Scope included the rebuild of the pipeline I2 access road damaged by the August 2022 storm events	February 16, 2023
Addendum 2 to ERTC 19	Scope included the re-installation of a V-ditch on east side of pipeline I2 access road.	May 11, 2023
Addendum 3 to ERTC 19	Scope included the installation of a concrete pad at HNWR-1A well and trenching to connect piping from the last HDD bore pit. Excludes yard fence and mechanical/ electrical scope.	December 10, 2025
Addendum 8 to ERTC 1[d]	Scope included the expansion of the Soil Processing Yard during the Soil Non-Time Critical Removal Action.	July 18, 2022
ERTC 20	Scope included site preparation for remedy pipeline G installation in the floodplain.	August 8, 2022
Addendum 1 to ERTC 20	Scope included remedy pipeline G, riverbank well vaults, and aggregate-based access road on top of pipeline G.	August 18, 2022
Addendum 2 to ERTC 20	Scope included remedy electrical work between Electrical Node 2 and well RB-5.	December 16, 2022
ERTC 21[e]	Scope included remedy pipeline E installation at and in the vicinity of the Transwestern Bench.	Renewed April 27, 2023 for asphalt repair/placement on portion of Pipeline E along NTH *(originally issued on October 17, 2022)*
Addendum 1 to ERTC 21	Scope included remedy electrical work along Pipeline E.	January 31, 2023
Addendum 2 to ERTC 21	Scoped included the installation of the sunshade at Node 1 and associated electrical work	November 7, 2024
ERTC 22[e]	Scope included remedy pipeline C11 installation.	Renewed April 27, 2023 for asphalt placement on portion of Pipeline C11 crosses NTH *(originally issued on January 9, 2023)*

ERTC Number[a]	Brief Description of Covered Areas and Scope of Authorized Activities	Original Issue Date
Miscellaneous erosion control ERTC	Scope included localized repair of the installed Pipeline F erosion control measures.	Renewed January 30, 2023 *(originally issued in February 2021)*
Addendum 1 to ERTC 11b	Scope included installation of stormwater erosion control measures along Pipeline B access road.	Renewed March 14, 2023 for storm damage repair work *(originally issued in February 2022)*
Addendum 2 to ERTC 11b	Scope included repair of stormwater erosion control measures along Pipeline B access road.	May 22, 2023
ERTC 23	Scope included the installation of infrastructure for PTI-1D floodplain extraction test.	September 26, 2023
ERTC 24 (rescinded due to a delay of the start date by more than 30 days)	Scope included the installation of Pipeline C Segment 18 from Station 0+00 to 3+00 in the East Ravine	May 16, 2025
ERTC 24	Scope included the installation of Pipeline C Segment 18 and an AB access road in East Ravine. This ERTC replaces the ERTC #24 issued in May for a partial segment of C18 (Station 0+00 to 3+00).	July 2, 2025
Addendum 1 to ERTC 24	Scope included expansion of the allowed work area in a specific tight area.	July 28, 2025
ERTC 25	Scope included the installation of Pipeline B in California.	September 15, 2025
ERTC 26	Scope included the installation of Pipeline B in Arizona using Horizontal Directional Drilling (HDD) technology.	October 15, 2025
ERTC 27	Scope included trench excavation to connect HDD piping to pad, as well as the installation of a concrete pad, and new HDPE pipeline.	November 25, 2025
ERTC 28	Scope included construction of the HNWR-1A well yard including security fence and dates	February 9, 2026
ERTC 29	Scope included installation of Pipeline B I-40 Undercrossing	February 9, 2026
ERTC 30	Scope included installation of Pipeline A from IM3 road to FW-1 including well/meter vaults and electrical handholds	March 17, 2026
ERTC 31	Scope included site preparation for installation of the Remedy-Produced Water Conditioning System at the Transwestern Bench.	April 29, 2026 Revised ERTC figure on May 20, 2026, to correct the work area

[a] For brevity and readability, the Non-Well ERTCs issued for Phase 1 construction, revegetation effort, and miscellaneous stormwater erosion control projects (October 2018 thru February 2022) are not listed in this report. For a complete list of those ERTCs, please Table 2-1a of the February 2022 Monthly Progress Report. The monthly progress reports can be accessed via the Project website.

[b] ERTC 17 was issued on December 15, 2021, for site preparation for mitigation planting, which involves the removal of tamarisk debris and root balls, offsite disposal of debris, installation of irrigation system, and leaching of soluble salts from the soil.

[c] Addendum 1 and 2 to ERTC 17 were renewed to allow for mitigation planting in Fall 2022.

[d] ERTC 1 was issued on August 10, 2018, for the setup at the Soil Processing Yard, Construction Headquarters, and various staging areas.

[e] Renewed for asphalt repair/placement along and cross NTH.

ERTC = Environmental Release-To-Construction

TCS = Topock Compressor Station

Table 2-3. Status of Work Variance Requests/Determination of FAA Associated with Work Variance Requests

May 2026 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup

PG&E Topock Compressor Station, Needles, California

WVR Number	Brief Description of Work Variance Request	Approval Dates	DTSC's Future Activity Allowance (FAA) Determination
18	On May 6, 2026, PG&E submitted the proposed Work Variance Request (WVR) #18 to incorporate FW-02B as a freshwater injection well in the groundwater remedy as directed by the Agencies on March 17, 2026.	DTSC and DOI are reviewing the WVR.	To Be Determined
17	On November 19, 2025, PG&E submitted the proposed WVR #17 to install the infrastructure for the Phase 2 RPWC (Remedy Produced Water Conditioning) system at the Transwestern Bench (TWB) facility instead of inside the Topock Compressor Station (TCS).	DTSC and DOI approved the WVR on February 5, 2026.	DTSC determined that WVR #17 is not a FAA.
Amendment 1 to WVR #12	TWB-2 was included in the 2015 Basis of Design (BOD) as an extraction well and was planned to connect to the rest of the groundwater remedy via pipelines and conduits. However, the water table was found to be absent at this location while drilling the pilot borehole. It was for this reason that PG&E proposed to decommission TWB-2. TWB-3 and its associated pipeline/conduit were approved for installation in place of TWB-2 in WVR #12.	DTSC and DOI approved the WVR on December 8, 2025	N/A
16	On September 3, 2025, PG&E submitted the proposed WVR #16 to move well MW-DD to IM3 access road as directed in DTSC's direction letter on August 4, 2025, and to update the response actions associated with this well (presented in the 2015 BOD) at the new location.	DTSC and DOI partially approved the WVR on October 16, 2025	DTSC determined that WVR #16 is not a FAA.
15	On May 22, 2025, PG&E submitted the proposed WVR #15 to a) modify the IRL-4 access road design for dual rotary rig access and incorporation of a pre-cast concrete retaining wall for better protection against stormwater erosion, and b) propose to use concrete stain for the pre-cast concrete retaining wall, if color is desired, instead of integrated concrete color which is not commercially available.	PG&E withdrew the WVR on September 12, 2025.	N/A
14	On April 14, 2025, PG&E submitted the proposed Work Variance Request (WVR) #14 to a) install Pipeline C18 in the East Ravine at the existing post-Non-Time Critical Removal Action (NTCRA) elevation instead of the higher elevation in the 2015 Final Design and b) install an aggregate-based access road in the East Ravine for remedy operations and maintenance instead of continued use and maintenance of the existing dirt road.	DTSC and DOI approved WVR #14 on May 9 and 16, respectively.	DTSC determined that WVR #14 is not a FAA.

WVR Number	Brief Description of Work Variance Request	Approval Dates	DTSC's Future Activity Allowance (FAA) Determination
13	On October 14, 2024, PG&E submitted the proposed Work Variance Request (WVR) #13 to relocate in-vault power and controls equipment at well IRZ-39 to aboveground panels on a new stanchion with a sunshade. This relocation is necessary to restore the operation of well IRZ-39, and to ensure its long-term operability.	DTSC and DOI approved WVR #13 on October 30, 2024.	On October 15, 2024, DTSC determined that the relocation of the in-vault power and controls equipment at well IRZ-39 to aboveground panels is considered a FAA. The following infrastructures are associated with the relocation: • New conduits (2-inch in diameter) containing electrical and communication/fiber optic wires will be installed aboveground from the new panels to belowground trenches (approximately 2 feet wide) that connect to the existing IRZ-39 well vault and the existing electrical pull box. Approximate total length of new conduits is 50 feet and new trench is 15 feet. The estimated volume of soil to be displaced from trenching is up to 5 cubic yards.
12	The extraction well TWB-3 was a provisional well in the remedy design, therefore a pipeline associated with this well was not specified in the design. On September 23, 2022, PG&E submitted a WVR to add a pipeline (and conduits) to connect TWB-3 to the groundwater remedy. In addition, the WVR proposes the deferral of construction of the Operations Building on the TWB.	DTSC and DOI approved WVR #12 on October 19 and 20, 2022, respectively.	On September 23, 2022, DTSC determined that the pipeline (and conduits) associated with well TWB-3 is an FAA. The following infrastructures are associated with installation of the pipeline: • A trench of approximate dimension of 2 feet wide by 3 to 4 feet deep by 470 feet long will be installed from well TWB-3 to well TWB-1. • Within the trench, there will be two High-Density Polyethylene (HDPE) pipes (2 or 3 inches in diameter by 470 feet long) and three conduits (2 inches in diameter by 470 feet long). Where the trench crosses over PG&E gas pipeline, one pipe sleeve (approximately 4 inches in diameter by 20 feet long, actual dimension may vary depending on field conditions) will be used to contain the HDPE pipes. Therefore, the total pipe length is 2 by 470 and 1 by 20, equaling 960 feet; and total conduit length is 3 by 470, equaling 1,410 feet. • The estimated volume of soil to be displaced from pipeline trenching and excavation to install pull boxes and a well vault is approximately 124 cubic yards.
11	On January 11, 2022, PG&E proposed a WVR for new mitigation planting areas in the floodplain. The purpose of the WVR is to propose new mitigation planting areas that are better suited for the mitigation plantings than some earlier identified areas.	DOI and DTSC approved WVR #11 on January 14 and 19, 2022, respectively.	DTSC determined that WVR #11 is not a FAA.

WVR Number	Brief Description of Work Variance Request	Approval Dates	DTSC's Future Activity Allowance (FAA) Determination
10	On December 1, 2021, PG&E proposed a WVR to revise the following pipeline alignments for constructability and safety during Phase 2A construction, as well as future operations and maintenance: 1. Outside the Compressor Station i. Realign Pipeline C18 in East Ravine. ii. Realign Pipeline I1 in Bat Cave Wash. 2. Inside the Compressor Station i. Consolidate piping/conduits (L1/L2/D1/D2) in the southern area of TCS into a common utility corridor ii. Realign Pipeline L3 to connect to Pipeline K.	DTSC and DOI approved WVR #10 on January 6 and 7, 2022, respectively.	DTSC determined that WVR #10 is not a FAA.
9	On March 20, 2020, and at DTSC's direction, PG&E submitted a WVR to relocate MW-A and convert IRZ-11 to a monitoring well.	DTSC and DOI approved WVR #9 on April 24, 2020.	DTSC determined that WVR #9 is not a FAA.
8	On September 12, 2019, PG&E proposed a WVR to change the alignment of pipeline segment C6 on the eastern slope of the MW-20 Bench. The purpose of the WVR is to reduce the amount of soil disturbance, reduce the number of plants to be removed, reduce the safety risks associated with construction atop the MW-20 bench, and reduce the hazards associated with operation at the MW-20 bench during construction.	DTSC and DOI approved WVR #8 on October 4 and 8, 2019, respectively.	DTSC determined that WVR #8 is not a FAA.
7	This WVR proposed the following changes to remedy infrastructure at the CHQ and SPY. a) Locate all temporary office and break trailers at the SPY. PG&E proposed to keep the three existing office trailers at their current locations in the SPY and add two additional office trailers and one break trailer for workers. The additional trailers will be equipped with aboveground sewage tanks, similar to the existing trailers. They will also be powered by Needles Electric. This will require the original SPY fence line to be extended south/southwest to encompass these trailers and the original truck entrance from National Trails Highway to the access road east of SPY. Neither changes reduce the overall area available for soil storage. b) Eliminate the workshop/sample processing building at the CHQ. The function planned for this building will be moved to the Carbon Amendment building at the MW-20 Bench. Removal of this building reduces the amount of soil disturbance by approximately 334 cubic yards. c) Eliminate the sunshade at the CHQ. The function for the sunshade will be replaced by the break trailer for the workers. Removal of the sunshade reduces the amount of soil distance (i.e., installation of the footings) by approximately 14 cubic yards. d) Convert the utility pad at the CHQ to a smaller transformer/electrical panel pad. With the relocation of the six trailers to SPY and elimination of the workshop/sample processing building, PG&E proposed to convert the utility pad to smaller pad for a smaller transformer/electrical panel to serve the remaining trailers at the CHQ. This reduces the amount of soil disturbance by approximately 61 cubic yards.	DOI and DTSC approved WVR #7 on June 14, 2019.	DTSC determined that WVR #7 is not a FAA.

WVR Number	Brief Description of Work Variance Request	Approval Dates	DTSC's Future Activity Allowance (FAA) Determination
6	In early October 2018, PG&E conducted a geotechnical investigation along the Pipeline F alignment on the entrance road to the TCS and the adjacent hill side. Based on the geotechnical results, the construction contractor (PIVOX) indicated that soldier piles and lagging would be required for temporary shoring. Over 40 soldier piles would be installed by drilling using a 330-sized excavator or larger. A 330-sized excavator has a general width of 11 feet, and counterweight clearance of approximately 4 feet. During operation, this rig would occupy a minimum 15 to 16 feet width of the TCS entrance road for about 12 days. The paved width of the road is between 22 to 24 feet in the area of shoring (per review of the location via Google Earth). Assuming a minimum clearance of 1 foot (which is still less than the recommended clearance) from any operating equipment, there will be approximately 5 to 8 feet of available lane width for access by TCS traffic. Large vehicles (tractor-trailers, delivery trucks, construction equipment) will likely not be able to pass by the active operation, and passenger vehicles may also not be able to pass the active operation in locations where the road narrows. Also, the excavator cannot be repositioned while soldier piles are being drilled. In sum, access to TCS will be severely restricted for about 12 days. This is not acceptable for Compressor Station operations. Therefore, PG&E proposed to realign Pipeline F (starting from segment F3) along the approved alignment of Pipelines B and J. Construction of Pipelines F, B, and J would occur in the same alignment and at the same time.	DOI and DTSC approved WVR #6 on May 21 and May 22, 2019, respectively.	DTSC determined that WVR #6 is not a FAA.
5	PG&E proposed to phase the remedy-produced water conditioning system within the approved footprint inside TCS.	DOI and DTSC approved WVR #5 on July 19 and July 22, 2019, respectively.	DTSC determined that WVR #5 is not a FAA.
4	PG&E proposed to revise a segment of Pipeline C near the I-40 bridge, to meet the permit requirement in Caltrans Encroachment Permit No. 08-18-6-MW-0533. The revision involves relocating a small segment of Pipeline C to within National Trails Highway to meet a minimum distance of 10 feet from current and future I-40 bridge footings. The treatment measure specified for Segment X of National Trails Highway in the Cultural and Historic Property Management Plan will be implemented during installation of this pipeline segment.	DOI/DTSC approved WVR #4 on May 14, 2019	DTSC determined that WVR #4 is not a FAA.

WVR Number	Brief Description of Work Variance Request	Approval Dates	DTSC's Future Activity Allowance (FAA) Determination
3	PG&E proposed changes within the CHQ fence line to avoid/minimize the overall amount of soil disturbance during construction, reduce the number of truck trips to haul wastewater, and allow for additional working space within the yard. There are no proposed changes to the CHQ footprint nor its fence line. The specifics are described as follows: • Relocate the decontamination pad from the western fence to the northern fence (near the western corner). Based on recent survey data collected during construction, the difference in ground elevation between northern and southern end of the pad is about 4 feet. Moving the pad to the northern fence would eliminate the difference in ground elevation and reduce the amount of soil disturbance by at least 80 cubic yards. • Bring the remedy-produced wastewater tank from belowground to aboveground, increase the tank volume from 1,000 to 2,500 gallons, and place the aboveground, double-walled tank adjacent to the decontamination pad. The change from belowground to aboveground reduces the amount of soil disturbance by at least 50 cubic yards. The change to a bigger tank will reduce the amount of truck trips needed to haul wastewater. The placement of the tank adjacent to the decontamination pad allows for the pad to function as a secondary containment for the haul truck during off-loading of the wastewater. • Defer construction of the underground sewage tanks. Deferral of the underground tanks reduces the overall amount of soil disturbance by at least 800 cubic yards. All sanitary wastes will be managed in aboveground sewage tanks (similar to the ones currently used for the SPY trailers) or portable toilets. • Swap the location of the construction trailers and the sunshade and change the configuration of the sunshade from a rectangle to a square. This change will allow for more working space within the CHQ. All functions that would occur in the Workshop/Sampling Processing building will be conducted in the construction trailers.	DOI/DTSC approved WVR #3 on January 4, 2019	DTSC determined that WVR #3 is not a FAA.

WVR Number	Brief Description of Work Variance Request	Approval Dates	DTSC's Future Activity Allowance (FAA) Determination
2	PG&E proposed to relocate the tie-in point for remedy construction water to an aboveground location inside TCS and below the TCS Water Storage Tanks. This is to eliminate the risk of damaging the existing pressurized 6-inch water line and to avoid any interference with PG&E Gas Operations control of the TCS's water supply. The WVR addressed this relocation, specifically: • Relocate the construction water tie-in point to an aboveground location below the TCS Water Storage Tanks, inside TCS – The final design calls for the temporary construction water line to hot-tap into the existing 6-inch steel water line just as the line turns southwest to continue to TCS. PG&E proposed to move the tie-in point to an aboveground valve manifold, located below the TCS Water Storage Tanks in the boneyard area. • Extend the temporary construction water line to the new tie-in point, along Pipeline 300A access road – The planned 4-inch HDPE temporary construction water line will be extended, following the route of the Pipeline 300A access road, to the new tie-in point inside TCS. This pipeline extension is approximately 1,950 feet and is also made of 4-inch HDPE. The pipe will be laid on ground surface and to the south of the 6-inch water line where possible. At the crossing with the Southern California Gas pipeline access road, the pipeline will be at grade with fill to allow for vehicle crossing.	DOI/DTSC approved WVR #2 on August 29, 2018	DTSC determined that WVR #2 is not a FAA.
1	This WVR addressed PG&E's proposed modification to the brine tanks containment for use by the remedy, specifically: • Upgrade the existing lined containment to concrete – The original synthetic liner material has degraded from exposure to ultraviolet light, heat, and abrasion and must be replaced. PG&E proposed to replace the synthetic-lined containment (including K-rails) with a concrete containment to support the groundwater remedy. The concrete color will be desert tan, and information on this proposed concrete color will be submitted to the agencies for review. The proposed concrete material will be similar to the material of the truck lane in the final remedy design (refer to Appendix E of the Final Basis of Design Report [CH2M, 2015a], Section 033 00, Cast-In-Place Concrete). • Shorten the length of the containment – This containment will have the same height as the existing containment, but with a slightly smaller footprint (the length is 5 feet shorter). This smaller footprint still meets the required volume for a secondary containment and allows for more space for remedy construction at the tight MW-20 bench.	DOI approved WVR #1 on June 22, 2018 DTSC approved WVR #1 on July 5, 2018	N/A

Source: 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.

CHQ = Construction Headquarters
DOI = Department of the Interior
DTSC = California Department of Toxic Substances Control
HDPE = high-density polyethylene
PG&E = Pacific Gas and Electric
SPY = Soil Processing Yard
TCS = Topock Compressor Station
WVRs = Work Variance Request

Table 2-5. Summary of Cumulative Percent Completeness of Key Phase 2b Construction Activities

May 2026 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

Key Activity	% Complete	Cumulative Status of Phase 2b Construction Activities (as of May 31, 2026)
Remediation Well* Installation	65%	• Pilot holes for FW-01, IRL-01, IRL-02, IRL-03, and IRL-04 have been drilled and temporarily backfilled. • FW-01 has been installed, developed, and tested. • IRL-01 remedy has been installed, developed, and tested. • IRL-03 has been installed, developed, and is undergoing testing. • IRL-04 has being drilled and is currently being installed.
Remediation Well Downhole Installation	0%	
Monitoring Well** Installation	94%	• MW-100 (former MW-I) wells (four total) have been installed and developed. • MW-101 (formerly MW-P) wells (four total) have been installed and developed. • MW-102 (former MW-AA) wells (three total) have been installed and developed. • MW-103 (formerly MW-BB) wells (three total) have been installed and developed. • MW-104 (formerly MW-CC) wells (three total) have been installed and developed. • MW-106 (formerly MW-J) wells (four total) have been installed and developed. • MW-107 (formerly MW-JJ) wells (two total) have been installed and developed. • MW-108 (formerly MW-Q) wells (four total) – four have been installed and developed. • MW-109 (formerly MW-GG) wells (two total) have been installed and developed. • MW-110 (formerly MW-FF) wells (two total) have been installed and developed.
C18 Pipeline Installation – California	100%	▪ Mobilization has been completed ▪ Site setup and utility location has been completed ▪ HDPE and conduit trench excavation has been completed ▪ HDPE and conduit trench subgrade preparation and compaction has been completed. ▪ HDPE force main has been completed. ▪ Conduit and pull box installation has been completed. ▪ HDPE and conduit trench backfill has been completed. ▪ ER-6 pre-cast concrete vault excavation, placement, and backfill has been completed. ▪ Final road construction has been completed. ▪ Pipeline contractor site cleanup and demobilization have been completed.
Pipeline A Installation – California	0%	
Pipeline A Section 10+00 to 11+80 Installation — California	95%	▪ Mobilization has been completed. ▪ Site setup and utility location has been completed. ▪ HDPE and conduit trench excavation has been completed. ▪ HDPE and conduit trench subgrade preparation and compaction have been completed. ▪ HDPE force main installation has been completed. ▪ Conduit and pull box installation has been completed. ▪ Well vault and meter vault installation has been completed. ▪ HDPE and conduit trench backfill has been completed. ▪ HDPE flushing and hydro static testing has been completed. ▪ Demobilization has started.
Transwestern Bench Site Preparation and Concrete Pad Removal	40%	▪ Mobilization has been completed. ▪ Site setup and utility location has been completed. ▪ Eco block removal has been completed, ▪ Concrete pad demolition has been started
Other Remedy Infrastructure Installation – California	0%	

Key Activity	% Complete	Cumulative Status of Phase 2b Construction Activities (as of May 31, 2026)
Pipeline I2 Station 15+00 to 12+00 Installation – California	100%	▪ Pipeline I2 mobilization has been completed ▪ Pipeline I2 site setup and utility location has been completed ▪ Pipeline I2 HDPE and conduit trench excavation has been completed ▪ Pipeline I2 HDPE and conduit trench subgrade preparation and compaction has been completed. ▪ Pipeline I2 HDPE force main installation has been completed. ▪ Pipeline I2 conduit and pull box installation has been completed. ▪ Pipeline I2 HDPE and conduit trench backfill has been completed. ▪ Pipeline I2 HDPE flushing and hydro static testing has been completed. ▪ Site restoration to pre-construction conditions, to the extent practicable, has been completed. ▪ Demobilization has been completed.
Pipeline B Installation – California	100%	• Mobilization has been completed. • Site setup and utility location has been completed. • Trench excavation has been completed. • HDPE pipeline fusion has been completed. • HDPE pipeline installation has been completed. • Trench backfill has been completed. • HDPE flushing and hydro static testing has been completed • Site restoration to pre-construction conditions, to the extent practicable, has been completed. • Demobilization has been completed.
Pipeline B Installation – Arizona (Horizontal Direction Drill)	100%	• Mobilization has been completed. • Site setup and utility location has been completed. • Horizontal Direction Drilling (HDD) entry and exit pit excavation has been completed. • HDD pipeline boring has been completed. • HDD HDPE pipeline fusion and installation have been completed. • HDD bore pit HDPE fusion and valve installation has been completed. • HDD bore pit backfill has been completed. • HDPE flushing and hydro static testing has been completed. • Site restoration to pre-construction conditions, to the extent practicable, has been completed. • Demobilization has been completed.
Pipeline B Installation – Arizona (Jack and Bore Drill)	100%	• Mobilization has been completed. • Site setup and utility location has been completed. • Jack and Bore Drilling (J&B) entry and exit pit excavation has been completed. • J&B casing installation has been completed. • J&B casing piping and grouting has been completed. • J&B entry and exit pit piping and vault installation has been completed. • J&B entry and exit pit excavation backfill has been completed. • HDPE flushing and hydro static testing has been completed. • Site restoration to pre-construction conditions, to the extent practicable, has been completed. • Demobilization has been completed.
Other Remedy Infrastructure Installation – Arizona	16%	• HNWR-1A well pad vegetation removal has been completed. • HNWR-1A well pad concrete pad excavation and preparation has been started. • HNWR-1A underground pipeline installation has been completed. • HNWR-1A sand vault excavation and placement has been completed. • HNWR-1A sand vault backfill has been completed.
Remedy Electrical Work	0%	

Notes:
* Phase 2b remediation wells include FW-01, IRL-1, IRL-2, IRL-3, and IRL-4.
** Phase 2b monitoring wells include MW-J, MW-P, MW-Q, MW-AA, MW-BB, MW-CC, MW-DD, MW-FF, MW-GG, and MW-JJ.

Table 2-6. Summary of Releases Occurred During Groundwater Remedy Construction and Startup

May 2026 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup

PG&E Topock Compressor Station, Needles, California

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
4/21/2026	Staging Area 6, on FMIT land	A release occurred during a hole specific capacity test. When the drill crew turned the pump on, water started leaking out of the camlock fitting between the drop pipe and the manifold. The testing water was released onto the aggregate base (AB) material.	IRL-01 testing water	Approximately ¼ to ½ gallons of the IRL-01 testing water	The impacted aggregate base (AB) material (about 1 gallon in volume) was removed and placed in a DOT 5-gallon bucket. The bucket was transported to the waste bucket accumulation area at the MW-20 bench.	The opposite end of the well-head manifold will always be placed on a flat surface, and the crew will ensure it is level to make a good seal in the cam-lock fitting
4/15/2026	BOR Land, managed by BLM	A released was observed during a morning inspection. A separated cardboard concrete clean out container at IRL-03 with its staple appeared to have torn the interior plastic liner. The tear released water containing grout onto the aggregate base (AB) material used to construct the drill pad.	Water containing grout	Unknown	The impacted aggregate base (AB) was removed and placed in a 5-gallon bucket. It was then transported to the waste accumulation area at the MW-20 bench.	A plastic lined “kiddie pool” placed on a pallet will be used for future grout clean outs. The pallet and “kiddie pool” will be placed in a plastic and wattle secondary containment. Once the Portland cement has cured, the “kiddie pool” will be disposed of in the CHQ dumpster.
3/20/2026	Staging Area 6 (across from IM3 plant), on FMIT land	A leak occurred from a frac tank containing IRL-03 drilling wastewater. The wastewater was released into the secondary containment. Since a corner of the secondary containment collapsed, the wastewater was released onto the ground.	Drilling wastewater	Approximately 100 gallons	On 3/20/2026, drilling water was removed from the leaking frac tank and placed into an empty tank. On 3/22/2026, a sample of the released wastewater was collected by the well team and sent to lab for rush turn around. Flags were used to delineate the extent of release observed on 3/20/2026. On 3/29/2026, the impacted AB were removed and placed in 55-gallon drums. The underlying soil was visually impacted. Compliance personnel collected three in-situ soil samples at the bottom of the excavation, and one composite sample from each drum. Lab results will be compared to nearby baseline soil data, and to inform whether additional removal is warranted.	Sandbags will be used to support the corners of the secondary containment to prevent them from collapsing.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
3/20/2026 (Continued)					On 3/29/2026, the impacted aggregate base (AB) was removed and placed into 3 55-gallon drums. AE archaeologists were onsite to monitor the removal. Based on visual observation, the release has also impacted the underlying soil. Three in-situ soil samples were collected by compliance personnel at the bottom of excavation of the impacted AB and sent to lab for analysis. A composite sample was also collected from each drum and sent to the lab. On 4/22/2026, lab results showed no detectable levels of Cr or Cr6 and low levels of Title 22 metals and TPH in the released wastewater. Post-cleanup in-situ soil sample results were compared to the baseline soil data collected at three locations. The comparison shows that concentrations of Title 22 metals in post-cleanup in-situ soil are generally comparable to the baseline soil data. Based on this comparison, no additional soil removal is warranted. The excavation was backfilled with the excavated AB.	
3/9/2026	IRL-03 drill site on BOR land, managed by BLM	The driller was advancing the last 20-foot section of 18-inch diameter drill casing. While advancing the drill bit, a blowout occurred between the annulus space between the 20-inch diameter conductor casing and the 18-inch diameter drill casing. The blowout released formation/drilling water from between the two casings. The water impacted members of the crew, the secondary containment and soils to the north of the borehole.	Drilling wastewater/ Hydraulic fluid	Approximately 10 gallons of drilling wastewater and 1 to 2 gallons of hydraulic fluid	Impacted AB on IM3 road was removed and contained in a 5-gallon bucket. Absorbents were used to soak up free oil in secondary containment. Impacted creosote was lightly sprayed with diluted Simple Green under supervision of the onsite biologist. The onsite AE archaeologist confirmed that there was no evidence of visually impacted material on the plateau. PG&E provided a verbal notification of DTSC on 3/11/2026 that PG&E will continue drilling the remaining 20 feet and complete well installation at IRL-03.	Modify the diverter.by removing the diverter pipe and install a pressure relief valve that allows the valve to swivel inside the derrick of the rig. This will reduce the potential for the valve to catch a hydraulic line again.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
3/9/2026 (Continued)		Some released water ran off the secondary containment and impacted the aggregate base (AB) material used to construct the well pad. As the drill crew worked to get the drill bit back inside the drill casing to prevent another blowout and began cleanup activities, the crew did not notice that the pressure relief valve on the diverter pipe had caught a hydraulic line on the side of the derrick. As the diverter pipe rotated with the drill casing, the caught hydraulic line ruptured, releasing hydraulic fluid approximately 20 feet above the ground surface. The hydraulic fluid sprayed onto crew members, the secondary containment, drill rig, 18-inch drill casing, a shade structure, AB on the IM3 road, and soil/one creosote on the slope outside the work area. The hydraulic fluid that impacted the 18-inch diameter drill casing started to flow down casing in between the annulus space of the 20-inch casing potentially impacting additional 18-inch drill casings below. It was confirmed on 3/10/2026 that at least 12 feet of the 18-inch diameter drill casing below the one that was being drilled had hydraulic fluid impacts. The impacted area outside of the work was about 20 feet long by 4 feet wide.			On 3/20/2026, a BOR representative surveyed the release area on the nearby slope and informed PG&E and Tribal monitors that based on field observations, no further action or disturbance to the impacted soil on the slope is required. In addition, the BLM archaeologist was also consulted and agreed that no further action is required w.r.t impacted soil on the nearby slope. On 4/21/2026, the impacted aggregate base (AB) on the IRL-03 drill pad (about 6 inches deep) was removed. Impacted AB was placed in a roll-bin and sampled for reuse. Based on lab results, the impacted AB cannot be reused onsite due to exceedances in levels for nickel and molybdenum. The material will be disposed of offsite. In-situ confirmation soil samples were collected at the bottom of the excavation. Care was taken not to over-excavate the AB and to not disturb the native soil. The confirmation sample results were compared with the baseline soil data collected from IRL-03. The comparison showed that the confirmation sample results are comparable to the IRL-03 baseline results. Therefore, no additional AB removal was warranted. The excavation was backfilled with regular AB.	
3/8/2026	IM3 Road	A release occurred during the removal of drill cuttings from a soil bin using a HydroX vacuum truck. The release occurred due to the float gauge on the vacuum truck that normally shuts off the valve was sand locked, preventing a proper valve closure.	Drill cuttings	Approximately 1 gallon	Impacted AB material was removed and placed in the soil bin. Soils inside this bin was characterized and managed in accordance with the Remedy Management Plan.	To avoid potential overfill moving forward, the HydroX vac truck will remove cuttings after every 20-foot stick of casing and unload at the SPY. If the HydroX is unable to remove cuttings after each 20-foot casing, drill cuttings will be left in the soil bin.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
2/6/26	SPY	Hydraulic fluid was observed on the access road east of the SPY after soil bins were picked up.	Hydraulic fluid	Unknown	Impacted material was picked up and containerized in 5-gallon buckets.	Well team reminded vendors to notify onsite personnel when coming onsite to pickup or delivery of bins.
1/15/26	Well IRL-01	Aquifer water was released when a driller turned on the air at IRL-01 to begin removing formation water and drill cuttings from the 18-inch diameter drill casing. The aquifer water was released between the connection of the diverter and the 18-inch drill casing. Most of the aquifer water was released onto the secondary containment in the work area, however some released onto the AB material used to construct the drill pad.	Aquifer water	Unknown	Aquifer water released onto the secondary containment was cleaned up. PG&E and Jacobs Compliance lead were notified. Results from the vertical aquifer profile (VAP) sampled at the nearby well, MW-101D, showed low levels of Cr at 18 µg/L, Cr6 µg/L, and Arsenic at 1.2 µg/L. Based on this information, the Jacobs Compliance lead requested for the extent of the release to be marked, as well as cleanup actions for the impacted AB be deferred until after drilling is complete at this location. Impacted AB was removed after completion of drilling in April 2026.	The crew added additional secondary containment in the work area.
1/8/26	Well MW-109 (Former MW-GG)	A release occurred while a vacuum truck was pumping off water from the mud tub. This was done to flush the drill casing with non-potable water at MW-109. However, during pumping, the hose from the vacuum truck got too close to the mud tub bentonite seal, causing the seal to break. Water from the mud tub flowed out from under the mud tub and secondary containment onto the drill pad that contains imported AB material.	Drilling wastewater	Unknown	PG&E and Jacobs Compliance lead were notified immediately. However, they were notified by field geologists of the results from the vertical aquifer profile (VAP), that indicated there were non-detectable levels of total Cr, Cr6, and Arsenic. Also, the impacted area is not currently accessible as it is located under the rig. Due to these conditions, the Jacobs Compliance lead requested to defer cleanup of the impacted material until after the rig is moved from this location. Impacted AB was removed after completion of drilling in March 2026.	The crew stopped work to fix the mud tub bentonite seal, effectively stopping the leak.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
12/22/25	Road shoulder of Oatman Highway in Arizona – Pipeline B at approximately Station 66 + 70	A release occurred when a portable toilet tipped over while a contractor was moving it onto a backhoe bucket in preparation for transporting the toilet to Staging Area 26 for the end of year holiday break. The released fluid did not go outside of the work area.	Sanitary fluid	About 3 quarts	Soil impacted from the release was removed and placed in three 5-gallon buckets. The buckets were taken to the waste accumulation area located at the MW-20 Bench.	The contractor staff has been advised to notify the site supervisor of any future relocation of portable toilets at the work area. This process will ensure proper coordination and equipment can be arranged for safe and secure relocation.
12/6/25	Oatman Highway (asphalt)	A release occurred during refueling of the Horizontal Directional Drill rig using a truck-mounted fuel cell. A contractor employee failed to open the fuel cell's pressure relief valve during refueling. Another employee stopped refueling, opened the valve, and a small amount of diesel spilled onto the side of the fuel cell and subsequently onto the asphalt pavement.	Diesel	About 8 ounces	Absorbents were used to soak up diesel on the asphalt road.	The Job Hazard Analysis (JHA) for refueling will be updated to require two mitigations to prevent spills: (1) Relieving the pressure relief valve prior to refueling, and (2) Only filling the tank to the 3/4 mark to prevent splashing that could result in a spill. The revised JHA will be reviewed with the field team during the safety meeting. Signage will also be placed on the fuel tank to serve as a visual reminder to open the pressure relief valve before beginning the refueling process.
12/5/25	HNWR in California – Pipeline B at approximately Station 25 + 40	A release occurred while the contractor was excavating for Pipeline B in California. Coolant from the CAT 325 excavator leaked onto its carriage, and then onto the ground.	Excavator coolant	About 1 quart	Soil impacted from the leak was removed and placed in two 5-gallon buckets. The buckets were taken to the waste accumulation area located at the MW-20 Bench.	A CAT technician performed a major mechanical repair to the engine the previous day (12/4/2025). The technician failed to complete the repair properly and/or the parts the technician installed failed, including a seal in the engine compartment which allowed coolant to escape.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
11/17/25	Elevated Construction Water Tank (Route 66 Sign)	A release occurred when a water truck driver pulled on a chain close to the valve on the elevated water tank. This prevented the valve from closing, releasing freshwater onto the ground. The driver stopped further spillage by closing the shutoff valve on the water line that feeds the elevated water tank. The freshwater was mostly released onto the shallow soil berm in the area. Some water did seep through the north end of the soil berm, however, the released water did not reach the Colorado River below.	Freshwater	About 5,700 gallons	The released water was mostly contained in the shallow soil berm in the area. It was disposed of in the TCS evaporation pond. Sandbags were used to contain some water that began to seep through the north end of the soil berm.	Preventative actions to avoid the bolt becoming disconnected from the clevis include replacing the bolt that broke with a double clevis link. The bolts of the clevis that will be attached to the control arm and chain will use cotter pins will be used to secure the bolt to the clevis instead of treads. A telescoping pole with a hook long enough to reach the valve on the elevated tank will be available at the tank so that the valve can be reached and closed from the ground level in the case that it does break again.
10/30/25	FW-01	A release occurred when naturally occurring confined aquifer conditions along with air pressure from the drilling process caused the formation to become pressurized. The pressure was relieved through the path of least resistance between the 20-inch and 18-inch diameter casing annulus space resulting in the release at ground surface.	A mixture of drilling and aquifer water	About 75 gallons	The release only impacted the drill pad. Any free liquid on the pad was removed using absorbent pads. The impacted AB material was sampled on 4/21/26 after the pad is removed. Sample results are below soil management levels, therefore, the AB was available for reuse onsite.	A blowout preventer (BOP) will be installed over the 20-inch diameter casing and around the 18-inch diameter drill casing sealing off the annular space. The BOP will have a pressure gauge to monitor pressure increases between the two casings and a pressure relief valve to relieve the pressure. The pressure relief valve will be connected to a 300-gallon poly tote via a 2-inch diameter hose with whip checks to contain water that is released with the pressure.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
10/29/25	FW-01	The first release occurred when the drill bit got too far ahead of the 18-inch diameter cutting shoe causing air and water to be forced out and up the sides of the 18-inch diameter casing instead of the inside of the drill pipe and out the discharge hose. The second release occurred when the interchange in the drill rod assembly downhole became clogged with drill cuttings due to the heaving sands and pressure began to build up. The pressure buildup freed the clog sending cuttings and water through the discharge hose and to the cyclone. Water was released through the top value on the cyclone and was carried outside of the work area in a mist impacting the ground surface.	A mixture of drilling and aquifer water	About 75 gallons	Any free liquid on the drill pad was removed using absorbent pads. The impacted drill pad or AB material was sampled on 4/21/26 after the pad is removed. Sample results are below soil management levels; therefore, the AB was available for reuse onsite. A sample of the drilling/aquifer water was collected and sent to lab. Results were provided to the landowner (FMIT) and the agencies on November 18, 2025 for discussion of next steps. On December 17, 2025, PG&E reached out to the landowner (FMIT), via email, for thoughts on next steps including any needed cleanup of the affected area on FMIT land. No response to PG&E's outreach was received to date.	For the first release, the task hazards will be reviewed and updated with information on what can happen when the drill bit is allowed to get ahead of the drill casing in heaving sands which can allow air and drilling/formation water to travel up the annuls space between the 20-inch and 18-inch casings and discharge to the surface. For the second release, a 130-micron filter over the cyclone's top valve was installed to allow air pressure to escape and contain the water over the soil bin and secondary containment if the interchange becomes clogged again.
10/7/25	Soil Processing Yard (SPY)	A release occurred during staging of a IDW soil bin inside the depression area of the SPY. As the bin truck was tilting and lowering the soil bin to the ground, drilling mud released to the ground through a door seal that failed	FW-01 drilling water/mud	10 to 15 gallons	The drill mud was removed to about 6 inches below ground surface.	Secondary containment is placed under bins to prevent material from contacting ground.
9/10/25	MW-JJ access road in the floodplain	A release occurred from a dump truck released on the newly constructed MW-JJ access road, creating a trail of approximately 15 feet long. The release occurred due to a defective brake system sensor on the underbelly of the dump truck.	Hydraulic brake fluid	About 16 ounces (2 cups)	The release was limited to the newly placed imported AB surfacing. No brake fluid was observed on floodplain sand. An approximate 7.5 gallons of impacted AB material were removed and transported to the waste accumulation area at the MW-20 Bench.	Operators and drivers continue to follow inspection protocols and remain vigilant of their surroundings to identify any leaks or other issues as soon as possible.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
9/10/25	National Trails Highway (NTH)	A release occurred from a water truck fuel tank, as the truck exited the Soil Processing Yard and turned onto NTH. The truck had just been fueled in the SPY, and upon turning onto NTH, diesel "sloshed" out of the cap and onto the roadway, leaving a sheen on the pavement for about 50 feet.	Diesel fuel	About 2 quarts	Granular oil absorbent material was used to clean up the release. Approximately four 5-gallon buckets of spent oil absorbent material, with minimal AB/soil from the road shoulder, were generated from the cleanup effort. The buckets were transported to the waste accumulation area at the MW-20 Bench.	Operators were remined to triple-check their fuel caps after fueling and prior to equipment and vehicle operation.
9/9/25	MW-101 (former MW-P)	A release of drilling mud occurred the soil hopper was removed from under the drill deck. As the hopper was being removed, it caught and ripped the plastic secondary containment and dragged it along the ground. The release occurred as the secondary containment was dragged on the ground.	Drilling mud	About 0.25 to 0.5 gallon	The impacted AB and some soil underlying the AB were removed. After inspection by the onsite AE Archaeological monitor, the impacted material was placed into the soil hopper.	The hopper was replaced with a smaller hopper that the forks could support. New plastic secondary containment was installed and a mud mat placed on top of the secondary containment to prevent the plastic from being damaged when the hopper is removed.
8/20/25	MW-101 (former MW-P)	A release of hydraulic oil occurred when gasket on the rig hydraulic actuator failed.	Hydraulic fluid	About 2 gallons	Although most of the released fluid landed on the secondary containment under the rig, droplets of oil were observed sparingly on the AB material at the drill pad, and nearby tank/equipment. No impacts to the ground below the AB were observed. After the impacted AB was removed and inspected by the onsite Archaeologist, it was transported to the waste accumulation area at the MW-20 Bench.	In the morning tailgates, crews will continue to discuss conducting 360 walkarounds to identify hydraulic releases that may occur during drilling operations.
8/19/25; 9/3/25	NTH/CHQ	A release of hydraulic oil occurred on 8/19/25 from a sonic drill rig during its transport on NTH. An additional leak location associated with the 8/19/25 released was identified on 9/3/25 at the CHQ.	Hydraulic fluid	About 2 gallons	Absorbent pads were used to absorb any oil sheens. Impacted AB at the CHQ was removed and containerized at the waste accumulation area at the MW-20 Bench	Crews in rear escort vehicles will be reminded to identify issues early.

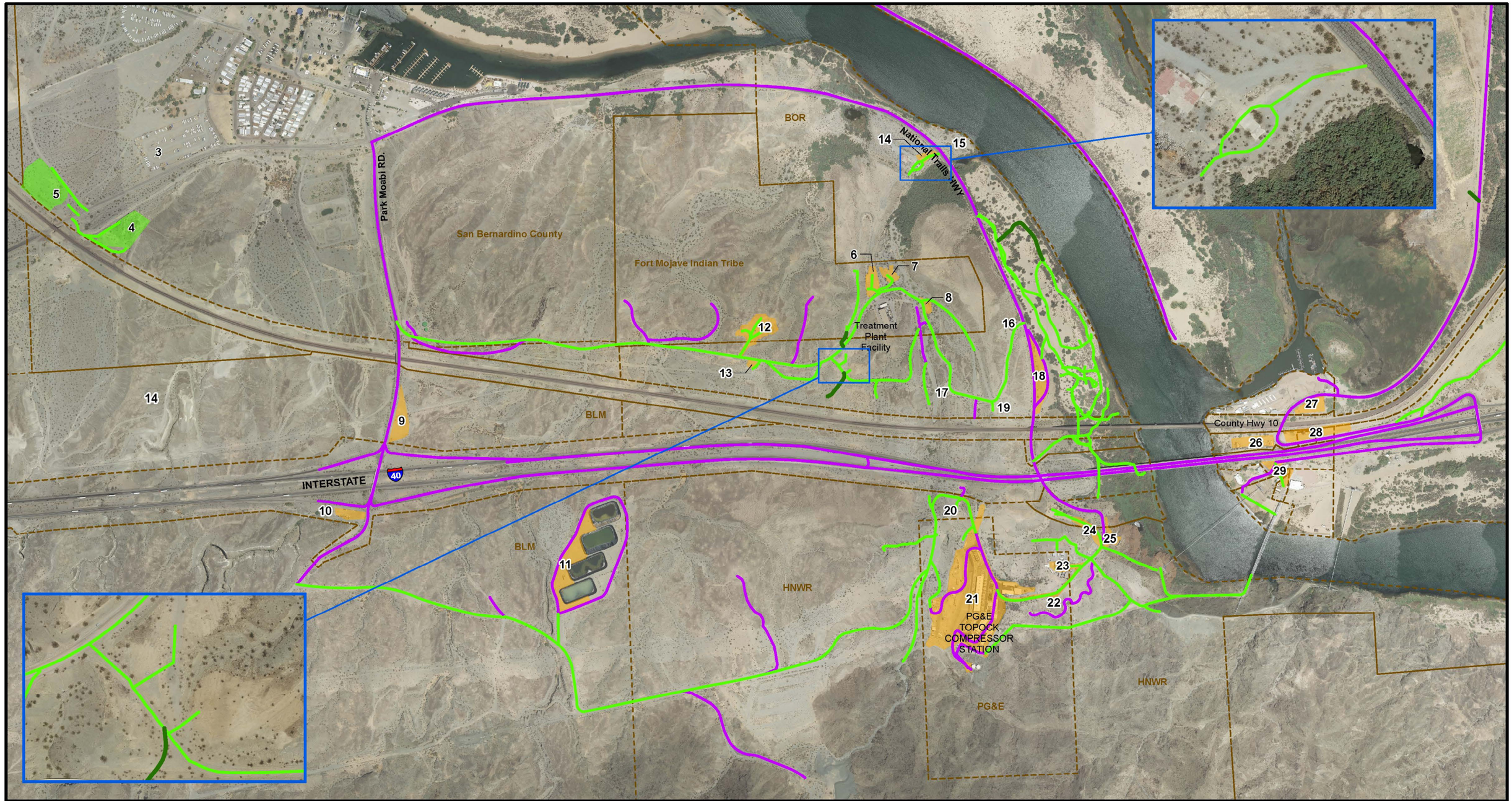
Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
7/27/25	CHQ	A release of hydraulic fluid from a loose/unsecured hydraulic hose during transportation of a street sweeper on a skip loader across the CHQ.	Hydraulic fluid	Unknown – about 70 feet of impacted rocks was visible.	Impacted rocks and soils were removed and containerized in 5-gallon buckets. A sample of the impacted soil was collected and sent to lab.	Crews will discuss in the daily tailgate meetings reminders to conduct 360 walkarounds, as well as the responsibility of each team member to confirm that equipment must be properly secured before moving it.
7/10/25	Transwestern Bench	The porta potty tipped over due to a severe wind gust and released blue-colored wastewater onto ground. The wastewater did not reach the nearby stormwater outfall	Blue-colored wastewater	Unknown	An approximate 3 gallons of impacted soil were removed.	The porta potty was tied down with ropes tie to concrete buckets to prevent it from tipping over in the future.
6/27/25	MW-100D	A release of hydraulic fluid occurred during drilling. As the hydraulic fluid line was pressurized at the time of release, the fluid impacted the drill rig, support tinder, secondary containment, soils in the hopper, drilling mud in the mud tub, and soils on the drill pad.	Hydraulic fluid	About 1 gallon	Impacted soil was removed and containerized at the drill pad. After the drill rig is moved off the location, an inspection was conducted and determined that no additional cleanup is needed. The drill rig and equipment were decontaminated at the Transwestern Bech. Wastewater generated was sampled to determine disposal options.	Additional inspections will be conducted on the hydraulic lines of the breakout table jaws during rough drilling condition. Ensure spare lines and parts are available for replacement.
6/15/25	MW-100D	A release of drilling water and mud from mud tub occurred as the drill crew pumped out water from the mud tub with a trash pump. While the trash pump was inside a containment, the hose connections were not, resulting in release to ground.	Drilling water and mud	About ½ gallon	About 1.5 gallons of the impacted soil was removed and containerized in a 5-gallon bucket. The trash pump was placed on secondary containment big enough for hose connections to be located within secondary containment.	Reminders communicated to staff during the daily tailboard safety meetings to make necessary changes to secondary containments when non-routine tasks are being performed.
5/31/25	IM-3 Access Road/Entrance to IRL-4 Work Area	A release of diesel from dump truck(s)	Diesel fuel	About 2 quarts	Impacted soil/rock was removed and placed into a 55-gallon drum at the MW-20 Bench. Release is due to thermal expansion of diesel in the fuel tank of dump truck(s) hauling excavated soil from IRL-4 to the soil processing yard.	Fuel construction equipment including dump truck(s) to about 75% capacity to allow for thermal expansion.

Date Release Identified[a]	Release Location	Description of Release	Material Released Outside of Containment	Approximate Volume of Material Released	Cleanup Action	Corrective Action To Prevent Re-Occurrence
5/9/25	IRL-1 (within Staging Area 6)	A release of freshwater	Freshwater	5-10 gallons	Impacted soil/rock was removed and placed into 5-gallon buckets. The release was due to a mud tub seal break while conducting cleanout runs after the 10-inch temporary conductor casing was advanced. Soil built up inside the 10-inch casing caused the vibration that broke the mud tub seal.	Remove soil build up inside casing. Procure a new mud tub to replace the older one to help create a better mud tub seal.
4/16/25	IRL-3	A release of hydraulic oil from the drill rig to ground	Hydraulic oil mixed with lube oil	About 0.25 gallons (most fell into secondary containment)	Impacted soil and rock were removed and placed into a bucket at the MW-20 Bench. Release was due to a seal failing. The drill rig was removed from site for repair.	Increase routine inspections in areas of hard drilling as this increases vibrations on drilling equipment.
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 were 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.

Note:

[a] For brevity and readability, releases prior to 2025 are not listed in this report. For a complete list of those releases, please Table 2-5 of the February 2025 Monthly Progress Report. The monthly progress reports can be accessed via the Project website.

Figures



LEGEND

- Existing Access Route continue to be used for remedial activities
- Existing Route to be used and maintained for access to remedial activities
- Roads to be improved or constructed for groundwater remedy
- Staging Areas for Remediation Project
- Soil Processing Yard (Area #5) and Construction Headquarter (Area #4) for Remediation Project

Notes:

1. Area #3 was not be used as the Construction Headquarter (CHQ). The CHQ was moved to Area #4.
2. Area #9 is the primary truck inspection area. Areas #4, 5, 18, and 25 might also be used depending on the specific construction activity.
3. Decontamination pads will be located in Area #4 (Construction Headquarters), Area #21 (Topock Compressor Station), and Area #23 (Transwestern Bench).
4. 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.
5. 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.
6. Public roadways outside of the EIR project area and the APE can also be used for remedy implementation.

N

0 900

Feet

UPDATED 03/10/2025

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

CH2MHILL

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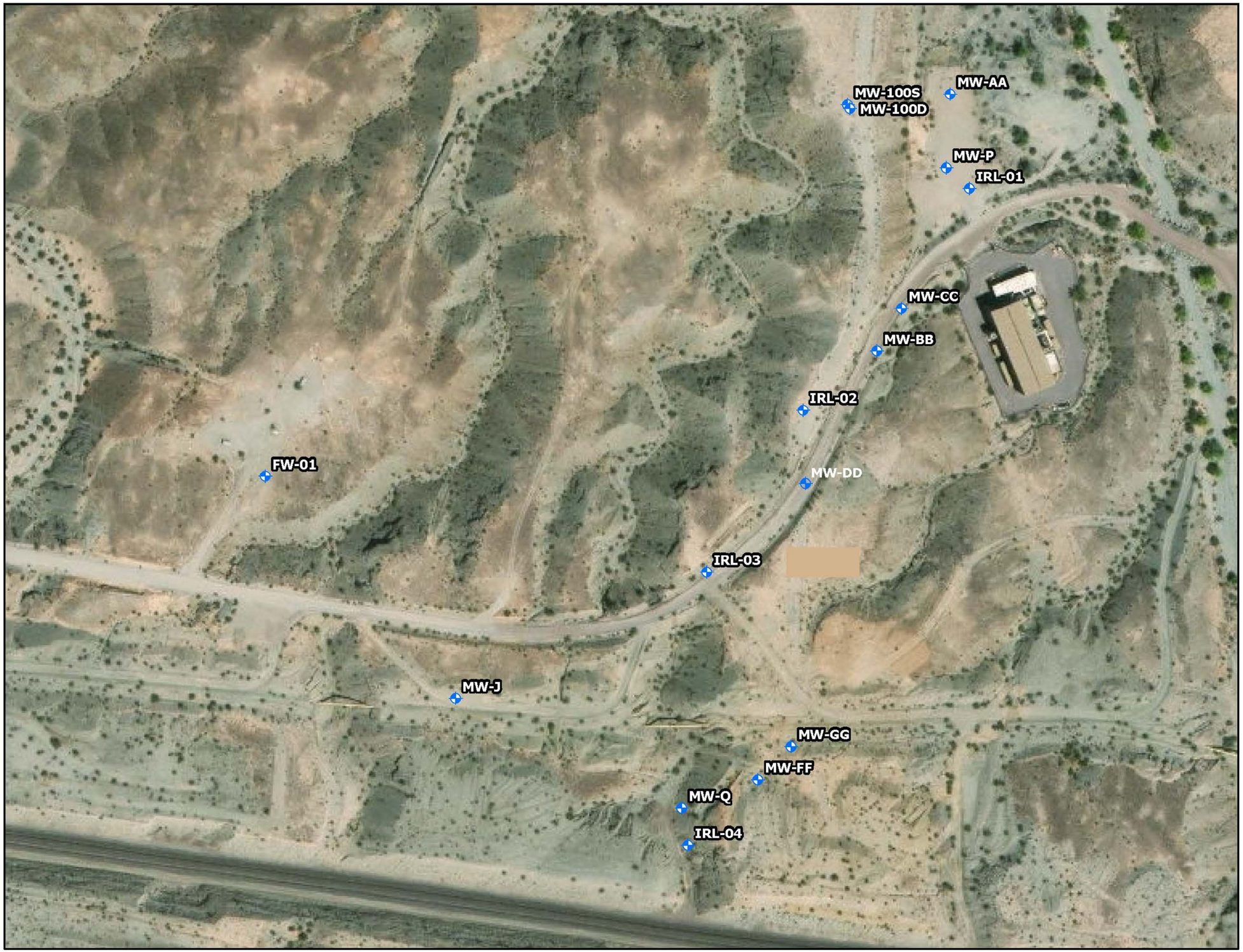

Legend

- Phase 2b Well

0 75 150 ft.

Figure 2-2
Phase 2b Well Locations
PG&E Topock Compressor Station, Needles, California

Jacobs

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Attachments

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

B. Available Vertical Aquifer Profile Sample Results from Well Drilling and Testing Activities
C. Soil Sampling Locations and Available Soil Analytical Results

Attachment A
Photographs

Photo showing the removal of the decon pad at the Transwestern Bench.

Photo showing an air sampling station at the Transwestern Bench

Photo showing the Soil Processing Yard.

Photo showing Staging Area 26 in Arizona after restoration.

Photo showing drill rig refueling at IRL-04.

Attachment D
Perimeter Air Sampling Analytical Results

Attachment D. Perimeter Air Sampling Analytical Results

In conformance with the approved *Construction/Remedial Action Work Plan for the Final Groundwater Remedy, PG&E Topock Compressor Station, Needles, California* (CH2M, 2015), air monitoring has been conducted during construction to evaluate the ongoing effectiveness of the dust control program, to guide modifications to field activities and engineering control measures, if necessary, and to document that construction activities do not result in the migration of soil contaminants beyond the work area boundaries.

Perimeter air monitoring has been performed if construction activities have the potential to generate visible dust. The air monitoring program consists of both real-time fugitive dust monitoring and perimeter air sampling for select soil contaminants. During Phase 2b, locations monitored and sampled are as follows:

- Real-time fugitive dust monitoring is performed at the perimeter of the Soil Processing Yard (SPY) and work areas.
- Real-time fugitive dust monitoring is performed at the perimeter of the East Ravine during installation of Pipeline C18.
- Real-time fugitive dust monitoring and air sampling for hexavalent chromium and dioxins/furans is performed at the perimeter of the Transwestern Bench (TWB) where hexavalent chromium and dioxins/furans (D/F) concentrations in soil have been reported (Jacobs, 2023).
- Air sampling for asbestos will be limited to work areas where asbestos-containing material (ACM) has been observed in prior field investigations. Perimeter air monitoring may also be performed at other work areas at the site if ACM is discovered during construction activities.

Project-specific levels of concern (LOCs) and action levels were developed as an indicator to determine whether additional dust control measures, as presented in the project's Dust Control Plan required by the Mojave Desert Air Quality Management District (MDAQMD), are necessary.

- The LOCs, which represent conservative concentrations of compounds that receptors outside the work area could be safely exposed to during construction, have been evaluated for all compounds that have been detected in soil samples collected at the site in the prior investigations. The LOCs were developed using standard U.S. Environmental Protection Agency (USEPA) and California Environmental Protection Agency risk assessment methodology, toxicology data, and exposure assumptions (USEPA, 2009, 224; DTSC, 2025). Both cancer and noncancer health effects were considered. For each type of health effect, the LOC was back-calculated from an established target or from acceptable cancer risk or noncancer hazard where USEPA or DTSC toxicity values are available. The LOCs for cancer effects are based on a target excess cancer risk of one in a million (1×10^{-6}). The LOCs for noncancer effects are based on a target hazard quotient of 1. The LOCs were developed using these assumptions:
  - Receptors are present outside the perimeter of the work areas
  - Exposure via inhalation is 10 hours per day for a 10 days on/4 days off schedule
  - Duration of Phase 2 of the final groundwater remedy construction is 20 months, and the construction at TWB is 2 months.
- The action level for fugitive dust monitoring is 100 micrograms per cubic meter ($\mu g/m^3$) for a net (downwind minus upwind) dust concentration. This action level is based on MDAQMD Rule 403, Part C. A 10-hour time-weighted average of readings collected throughout the workday will be used to document compliance with MDAQMD Rule 403.
- For analytes detected in soil, the following equation was used to calculate maximum allowable airborne particulate concentrations for receptor exposure outside the work area (based on the approach presented by Marlowe [1999]):

$$AL = \frac{LOC\ x\ 1{,}000{,}000\ mg/kg}{CS}$$

Where:

AL = action level for airborne particulates ($\mu g/m^3$)
LOC = Project-specific risk-based level of concern ($\mu g/m^3$)

CS = maximum detected concentration of compound in site soil (milligrams per kilogram [mg/kg])

Action levels were determined as follows:

- Soil data from prior investigations were gathered for the entire site. For the work at the TWB, historical soil data from AOC11 and AOC12 along with Phase 2 data collected in October 2022 were gathered and evaluated.
- Sample locations within the maximum construction footprint were evaluated. Some sample locations were removed from evaluation as they were within the compressor station in locations where no construction activities will actually occur.
- The maximum reported soil concentration for each compound was determined and then used to calculate an airborne particulate action level. For work at the TWB, only hexavalent chromium and D/F were evaluated.
- All compounds had allowable airborne particulate action levels greater than 100 µg/m^3 except for hexavalent chromium at a few locations.
- Therefore, keeping fugitive dust below the action level 100 µg/m^3 will result in airborne particulate concentrations of contaminants (other than hexavalent chromium) remaining below their respective LOCs.
- Fugitive dust monitoring will be used to evaluate airborne contaminants in dust for all compounds except for hexavalent chromium.

In May 2026, two Aeroquals continuous dust monitors remain in operation at the SPY. Temporary exceedance of the 100 micrograms per cubic meter (µg/m^3) threshold occurred on 5/7, 5/9, 5/27, 5/28 at the northern Aeroqual. These exceedances occurred during working hours and were caused by construction traffic through the SPY. Compliance personnel requested additional water applications within the SPY to control fugitive dust.

Starting May 18, 2026, three Aeroquals continuous dust monitors were installed and began operation at the Transwestern Bench (TWB). Temporary exceedances of the 100 micrograms per cubic meter (µg/m^3) threshold occurred on 5/18, 5/19, and 5/20 during the removal of the eco blocks and the office trailer. One temporary exceedance of the threshold occurred on 5/29 during the removal of the concrete decon pad. Additional water was applied to minimize fugitive dust.

In addition, one air sampling event was conducted on May 28, 2026 (for Cr6) during the removal of the TWB decon pad and one air sampling event was conducted on May 30, 2026 (for Cr6 and D/F) during the removal of the concrete pad on the northwest corner of the TWB.

Tables D-1a and D-1b of **Attachment D** present all analytical results from air sampling events conducted during Transwestern Bench work available at this time.

D.1 References Cited

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U.S. Environmental Protection Agency (USEPA). 2009. *Risk Assessment Guidance for Superfund Volume I: Human Health Evaluation Manual (Part F, Supplemental Guidance for Inhalation Risk Assessment)*. Final. OSWER 9285.7-82. January.

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Table D-1a. Perimeter Air Sampling Results – Hexavalent Chromium

May 2026 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

Sample ID[a]	Location	Sampling Date	Hexavalent Chromium Concentration in micrograms per cubic meter
TWB-Cr6-U1-20260528	TWB-Upwind 1 Southeast	5/28/2026	Analytical result is pending
TWB-Cr6-D1-20260528	TWB-Downwind 1 Northwest	5/28/2026	Analytical result is pending
TWB-Cr6-D2-20260528	TWB-Downwind 2 Northeast	5/28/2026	Analytical result is pending
TWB-Cr6-U1-20260530	TWB-Upwind 1 Southeast	5/30/2026	Analytical result is pending
TWB-Cr6-D1-20260530	TWB-Downwind 1 Northwest	5/30/2026	Analytical result is pending
TWB-Cr6-D2-20260530	TWB-Downwind 2 Northeast	5/30/2026	Analytical result is pending

[a] For brevity and readability, perimeter air sampling results for hexavalent chromium collected during prior Phase 1 and 2a construction are not included in this report. For those results, please see Table D-1a of the February 2022 and February 2024 Monthly Progress Reports, respectively. The monthly progress reports can be accessed via the Project website.

Table D-1b. Perimeter Air Sampling Results – Dioxins/Furans

May 2026 Monthly Progress Report for the Final Groundwater Remedy Construction and Startup
PG&E Topock Compressor Station, Needles, California

Sample ID[a]	Location	Sampling Date	Hexavalent Chromium Concentration in micrograms per cubic meter
TWB-Cr6-U1-20260530	TWB-Upwind 1 Southeast	5/30/2026	Analytical result is pending
TWB-Cr6-D1-20260530	TWB-Downwind 1 Northwest	5/30/2026	Analytical result is pending

[a] For brevity and readability, perimeter air sampling results for hexavalent chromium collected during prior Phase 1 and 2a construction are not included in this report. For those results, please see Table D-1a of the February 2022 and February 2024 Monthly Progress Reports, respectively. The monthly progress reports can be accessed via the Project website.

Attachment E
Noise Monitoring Results
(SEIR NOISE-2 and NOISE-3 Requirement)

Attachment E. Noise Monitoring Results

In conformance with the Supplemental Environmental Impact Report (SEIR) Mitigation Measure NOISE-2, noise monitoring has been conducted with ANSI S1.4 Type 1, precision sound level meters when construction activities are within the specified distance (e.g., 1,850 feet from sensitive receptors in California) at approved monitoring locations previously determined in coordination with the Tribes and landowners/managers. The goal of the noise monitoring is to identify if noise levels from project construction activities exceed applicable standards of the San Bernardino and Mohave County codes. Exceedance of standards would require coordination with the Tribes and landowners/managers to evaluate the potential constraints and locations for temporary engineered acoustical barriers. Consistent with the request of the Tribes, monitoring equipment is not left at the approved monitoring locations; rather, it is mounted on a tripod for attended representative measurements and removed when the monitoring event is complete.

When a new construction activity is conducted or a previously monitored construction activity is conducted closer to a noise-sensitive area, monitoring is conducted at more frequent intervals to evaluate the potential need for an acoustical barrier. As the activities continue in the same location and multiple attended measurements indicate that the applicable standard has not been exceeded by the construction activity, periodic attending monitoring events are conducted to confirm continued compliance.

The attended monitoring events document the A-weighted equivalent continuous sound level (L_{eq}) at periodic intervals (e.g., 5, 10, 15, 20, 30, 40, 50 and 60 minutes). The trend of the data at these intervals is evaluated in the field to assess the stability in the sound level to determine the duration of the monitoring event. To date, when the interval data are relatively stable or clearly below the standard, the attended monitoring event is typically be 10 minutes in duration. As the applicable standards are expressed in terms of the 24-hour average day-night sound level (L_{dn}) which is based on the L_{eq} metric, the measured L_{eq} is compared to the applicable L_{dn} standard for mobile noise sources (i.e., 60 A-weighted decibels [dBA] for Park Moabi, 65 dBA at all other locations). This results in a reasonable and conservative assessment given construction activities are not emitting noise continuously over a 24-hour period, nor are they occurring frequently during the nighttime hours (10 p.m. to 7 a.m.).

In May 2026, the following monitoring events were conducted:

- Seven events at the pre-approved location west of the mobile home park at Moabi Regional Park. Construction activities closest to this monitoring location include soil management activities at the SPY and Construction Headquarters (CHQ), as well as traffic on NTH. The sound level typically varied between 38 and 60 dBA, with an average and median of 45-47 dBA.
- Five events at the pre-approved location near and at the same elevation as Maze C. Construction activities closest to this monitoring location are associated with well drilling/ development in the upland and well support activities at Staging Area 6, as well as drilling at IRL-04 and development at IRL-03. The sound level typically varied between 42 and 54 dBA, with an average and median of 48 dBA.

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	**5/31/2026**	**6/1/2026**	**6/2/2026**	**6/3/2026**	**6/4/2026**	**6/5/2026**	**6/6/2026**
Start Time (PST)	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 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*, F4*, G5*, E5*, F5***	^IRL-04 Drilling, IRL-03 Development TWB Site Preparation, Concrete Pad Removal, and Pipeline E Installation	^IRL-04 Drilling, IRL-03 Development TWB Site Preparation, Concrete Pad Removal, and Pipeline E Installation	^IRL-04 Drilling, IRL-03 Development TWB Site Preparation, Concrete Pad Removal, and Pipeline E Installation	^IRL-04 Drilling, IRL-03 Development TWB Site Preparation, Concrete Pad Removal, and Pipeline E Installation	^IRL-04 Drilling, IRL-03 Development TWB Site Preparation, Concrete Pad Removal, and Pipeline E Installation	No Work	No Work
Site Wide Revegetation **F5*, F6*, D5*, G5***	No Work	No Work	Irrigation Watering	No Work	Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	**6/7/2026**	**6/8/2026**	**6/9/2026**	**6/10/2026**	**6/11/2026**	**6/12/2026**	**6/13/2026**
Start Time (PST)	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 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*, F4*, G5*, E5*, F5***	No Work	No Work	^IRL-04 Drilling, IRL-3 Development TWB Site Preparation and Pipeline E Installation	^IRL-04 Drilling, IRL-3 Development TWB Site Preparation and Pipeline E Installation	^IRL-04 Drilling, IRL-3 Development TWB Site Preparation and Pipeline E Installation	^IRL-04 Drilling, IRL-3 Development TWB Site Preparation and Pipeline E Installation	^IRL-04 Drilling, IRL-3 Development TWB Site Preparation and Pipeline E Installation
Site Wide Revegetation **F5*, F6*, D5*, G5***	No Work	No Work	Irrigation Watering	No Work	Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	**6/14/2026**	**6/15/2026**	**6/16/2026**	**6/17/2026**	**6/18/2026**	**6/19/2026**	**6/20/2026**
Start Time (PST)	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 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*, F4*, G5*, E5*, F5***	^IRL-04 Drilling, MW-38D Development Mobilization and Site Setup TWB Site Preparation and Pipeline E Installation	^IRL-04 Drilling, MW-38D Development TWB Site Preparation and Pipeline E Installation, HNWR-1A Concrete Pad	^IRL-04 Drilling TWB Site Preparation and Pipeline E Installation, HNWR-1A Concrete Pad	^IRL-04 Drilling TWB Site Preparation and Pipeline E Installation, HNWR-1A Concrete Pad	^IRL-04 Drilling TWB Site Preparation and Pipeline E Installation, HNWR-1A Concrete Pad	No Work	No Work
Site Wide Revegetation **F5*, F6*, D5*, G5***	No Work	^NTCRA Planting Test Pits	^NTCRA Planting Test Pits Irrigation Watering	^NTCRA Planting Test Pits	^NTCRA Planting Test Pits Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	**6/21/2026**	**6/22/2026**	**6/23/2026**	**6/24/2026**	**6/25/2026**	**6/26/2026**	**6/27/2026**
Start Time (PST)	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 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*, F4*, G5*, E5*, F5***	No Work	No Work	^IRL-02 Drilling Mobilization and Site Setup, MW-35-39 and MW-T Air Knife Pipeline A and H Pre-Work Field Review, Pipeline A Installation TWB Site Preparation and Pipeline E Installation	^IRL-02 Drilling, Flood Plain IRZ Wells Air Knife TWB Site Preparation and Pipeline E Installation, Pipeline A Installation	^IRL-02 Drilling TWB Site Preparation and Pipeline E Installation, Pipeline A Installation	^IRL-02 Drilling TWB Site Preparation and Pipeline E Installation, Pipeline A Installation	^IRL-02 Drilling TWB Site Preparation and Pipeline E Installation, Pipeline A Installation
Site Wide Revegetation **F5*, F6*, D5*, G5***	No Work	No Work	Irrigation Watering	No Work	Irrigation O&M/Watering	No Work	No Work
Primary Planned Activities	**6/28/2026**	**6/29/2026**	**6/30/2026**	**7/1/2026**	**7/2/2026**	**7/3/2026**	**7/4/2026**
Start Time (PST)	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 AM	5:00 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*, F4*, G5*, E5*, F5***	^IRL-02 Drilling TWB Site Preparation and Pipeline E Installation, Pipeline A Installation	^IRL-02 Drilling TWB Site Preparation and Pipeline E Installation, Pipeline A Installation	^IRL-02 Drilling TWB Site Preparation and Pipeline E Installation, Pipeline A Installation	^IRL-02 Drilling TWB Site Preparation and Pipeline E Installation, Pipeline A Installation	No Work	No Work	No Work
Site Wide Revegetation **F5*, F6*, D5*, G5***	No Work	No Work	Irrigation Watering	No Work	Irrigation O&M/Watering	No Work	No Work

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

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

(Groundwater Data Presented in Separate PDF)