



THE STATE
of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 2337.38.007

September 15, 2022

Shelby Lathrop
Chevron Environmental Management Company
6001 Bollinger Canyon Road, C2092,
San Ramon, CA 94583

Re: Trading Bay Facility
Hazard ID: 1263
2021 Annual Report
ADEC Comments - Report Approved

Dear Ms. Lathrop;

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program has reviewed the Trading Bay Production Facility *2021 Annual Report* dated August 15, 2022. Thank you for providing this report which was received in our office on August 15, 2022. The report is approved with the following comments.

It is our understanding, based on the review of the pump test data presented in the report, that there is little communication between pumping wells at the current pumping rates. There is significant drawdown in the pumping wells, but apparently no reaction in water levels in adjacent recovery wells, implying that pumping rates are not sufficient to capture all dissolved phase liquids along the bluff. We are requesting that Chevron address this deficiency in pumping flow rates, particularly in the northern portion of the property where dissolved concentrations are greatest. Chevron will demonstrate groundwater pumping rates sufficient to capture the dissolved phase and NAPL plumes moving east off the property.

If you have questions about this letter, or any other aspect of this project, please contact me at (907) 262-3412, or by e-mail at peter.campbell@alaska.gov

Sincerely,

Peter Campbell

Peter Campbell
Environmental Program Specialist
Cc: Craig Wilson, Stantec