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MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Larry Hogan
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Secretary

April 7, 2015

Mr. John J. Hoban
Global Remediation SouthCentral Region
ExxonMobil Corporation
7715 Crittenden Street, #309
Philadelphia PA 19118-4421

RE: RESPONSE TO SW AND NE SEQUENTIAL WELL CONVERSION SUMMARY REPORT AND REMAINING SW WELL REBOUND ASSESSMENT WORK PLAN
Case No. 2006-0303-BA
Former Exxon R/S No. 2-8077
14258 Jarrettsville Pike, Phoenix
Baltimore County, Maryland

Dear Mr. Hoban:

The Oil Control Program recently completed a review of the *Southwest and Northeast Sequential Well Conversion Summary Report and Remaining Southwest Well Rebound Assessment Work Plan* – December 16, 2014, which provided results of the approved sequential shutdown of selects wells in the northeast and southwest recovery areas, per the *Southwest and Northeast Sequential Well Conversion Work Plan - August 30, 2013* and the Department's *Work Plan Approval - October 16, 2013*. Based on the analytical data collected during the sequential shutdown of select recovery wells in areas to the southwest and northeast of the Former Exxon service station, a proposal to conduct two stages of simultaneous recovery well shutdown in the area southwest of the former service station is proposed.

Beginning in November 2013 and completed in August 2014, seven recovery wells in the southwest area (MW-25, MW-31, MW-49, MW-55, MW-109, MW-117, and MW-119) and two recovery wells in the northeast area (MW-80A and MW-80B) were taken offline sequentially. These wells and surrounding wells were sampled and monitored to observe rebound conditions of both dissolved petroleum concentration levels and groundwater elevations. Based on the results of the monthly data collected, which indicate no adverse effects, these recovery wells remain offline and were converted to monitoring wells.

To date, a total of 19 recovery wells have been converted to monitoring wells as part of three previous shutdown events in the southwest area that occurred during the periods of February through June 2010, May through October 2011, and November 2013 through August 2014. In addition, a rebound assessment was performed in November and December 2009 on select retention pond recovery wells to assess rebound conditions after turning off pumps in this area that formally contained liquid phase hydrocarbons (LPH). No LPH were detected during shutdown of the pumps in the retention pond area and dissolved levels returned to pre-shutdown levels after an initial increase. These shutdown events of select wells were conducted to provide evidence that continued groundwater recovery is no longer necessary for contamination recovery or for hydraulic control.

Based on the lack of significant rebound of dissolved phase petroleum levels during all of these recovery well shutdown events, a proposal was included in the report to shut down the remaining 14 recovery wells in the southwest area. The shutdown will be performed in two Stages. Stage 1 will simultaneously remove pumps from seven recovery wells (MW-24, MW-26, MW-29, MW-30, MW-35, MW-52, and MW-154), which are located closest to the former UST area. Monthly gauging and sampling will be performed at these wells and selected surrounding wells for a three month period. If groundwater gauging and sampling results demonstrate no adverse affects, Stage 2 activities will commence. Stage 2 will consist of simultaneously shutting down the remaining seven recovery wells (MW-40, MW-72, MW-116, MW-118, MW-126, MW-127, and MW-156). These wells and select surrounding wells will be gauged and sampled on a monthly basis for a period of three months. If no adverse conditions are observed over the monitoring period, the wells will remain as monitoring wells and be sampled on the pre-shutdown monitoring schedule.

The Department approves the request to perform shutdown of the down-gradient recovery wells to the southwest as proposed with the following modifications and requirements.

1) When Stage 1 data is collected, the results of monitoring must be submitted for review and approval before proceeding to Stage 2. Email submittal of data is acceptable along with a request to proceed to Stage 2.

2) If adverse conditions (e.g., rebound of dissolved petroleum concentrations in monitoring wells or drinking water supply wells) are shown following shutdown of the recovery wells, ExxonMobil must notify the Oil Control Program immediately and re-start groundwater recovery pumping.

3) A Rebound Assessment Report, including all relevant data, must be submitted within 45 days following completion of all field activities associated with the post-shutdown monitoring.

Notify the Oil Control Program at least five (5) working days prior to implementation of the approved *Work Plan.* If you have any questions, please contact the case manager, Ms. Ellen Jackson, at 410-537-3482 or via email: ellen.jackson@maryland.gov.

Sincerely,

Christopher H. Ralston, Administrator
Oil Control Program

EJ/nln

cc: Carlos Bollar, Esquire (Archer & Greiner, P.C.)
William F.C. Marlow Jr., Esquire (Marlow & Wyatt)
Joseph P. Perez, Esquire (ExxonMobil Corp.)
Mr. Mark Schaaf (Kleinfelder East, Inc.)
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