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May 1, 2020

*Delivered via Email and FedEx Overnight Delivery*

Mr Jeffery E Mendenhall  
South Carolina Department of Health and Environmental Control  
Assessment Section, UST Management Division  
Bureau of Land and Waste Management  
2600 Bull Street  
Columbia, South Carolina 29201

**Subject: Horizontal Wells Flow Optimization  
Plantation Pipe Line Company  
Lewis Drive Remediation Site  
Belton, South Carolina  
Site ID #18693, "Kinder Morgan Belton Pipeline Release"**

Dear Mr Mendenhall,

On behalf of Plantation Pipe Line Company (Plantation), Jacobs has prepared this letter summarizing planned reductions of flows to the horizontal biosparging wells currently operating as part of the remediation system at the Lewis Drive Site. Since their start-up in May 2017, operation of the horizontal sparging wells has significantly reduced petroleum hydrocarbon impacts in the Hayfield Zone (HZ).

During the April 6, 2017 gauging event, before system startup, seventeen HZ gauging features contained measurable product, with thicknesses ranging from 0.01 foot to 3.45 feet (*Lewis Drive – April 2017 Monthly Status Update*, CH2M, 2017). During the first quarter of 2020, after nearly 3 years of system operation, measurable product was not detected in any of the HZ monitoring wells and in only 2 recovery features, with a maximum thickness of 0.03 foot. As of the March 2020 quarterly monitoring event, 30 of the 37 HZ monitoring wells were nondetect or below target screening levels (TSLs) for petroleum constituents. The 7 wells that still show detections above the TSLs are all outside the direct influence of the system.

In order to optimize the entire biosparging system, Plantation plans to reduce the flows to the horizontal wells and direct the air to other areas with higher hydrocarbon concentrations. Rebound of dissolved petroleum concentrations in the HZ monitoring wells will be monitored within the current groundwater sampling program in accordance with the *Groundwater and Surface Water Monitoring and Reporting Plan (April 1, 2020 to March 31, 2021)*, submitted April 23, 2020. If the gauging and groundwater results from the HZ monitoring wells remain at their current low levels, Plantation plans to discontinue the operation of the horizontal biosparging wells. If the product levels and dissolved concentrations rebound, then operation of the horizontal wells will be resumed.

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If you have specific questions about this data transmittal, please call me at (919) 859-5789 or Mr Jerry Aycock/Plantation at (770) 751-4165

Regards,



William M Waldron, P E.  
Program Manager

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