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in time. DEP's corrected response to the Public Staff's data request necessitates revisions to the column in Corrected Lucas Exhibit 18 that indicates how many wells were in place at each facility prior to the year 1980.

4. The Public Staff contacted all parties and, with the exception of Harris Teeter, LLC and the North Carolina Clean Energy Business Alliance (NCCEBA), all parties stated that they do not object to this motion. Counsel for Harris Teeter, LLC and NCCEBA were contacted but did not respond to the request.

5. In light of the foregoing, the Public Staff respectfully requests leave to file a Second Corrected Lucas Exhibit 18 to reflect the changes discussed herein.

WHEREFORE, the Public Staff respectfully requests that the Commission grant leave to file a Second Corrected Lucas Exhibit 18.

Respectfully submitted this, the 5th day of October, 2020.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

Dianna W. Downey  
Chief Counsel

Electronically submitted  
s/ Nadia L. Luhr  
Staff Attorney

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## **CERTIFICATE OF SERVICE**

I certify that a copy of this Motion has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This, the 5th day of October, 2020.

Electronically submitted  
/s/ Nadia L. Luhr



DEP response to Public Staff Request No. 101-1 on March 2, 2020 and corrected on October 1, 2020

Please state how many groundwater monitoring wells the Company had in place cumulatively prior to 1980, 1990, 2000, 2010, 2013, 2014, 2015, 2016, 2017, and 2018 and how many are in place today. Please provide this data for each generating plant site separately.

Site	Prior to 1980	Prior to 1990			Prior to 2000			Prior to 2010			2013			2014		
		New	Abandoned	New Total	New	Abandoned	New Total	New	Abandoned	New Total	New	Abandoned	New Total	New	Abandoned	New Total
Asheville	0	0	0	0	0	0	0	5	0	5	18	1	22	7	1	28
Cape Fear	0	0	0	0	0	0	0	6	0	6	24	0	30	0	0	30
HF Lee	0	0	0	0	0	0	0	4	0	4	21	0	25	0	0	25
Mayo*	0	0	0	0	0	0	0	4	0	4	9	0	13	0	0	13
Mayo Monofill	0	0	0	0	0	0	0	1	0	1	4	0	5	0	0	5
Robinson	0	0	0	0	4	0	4	0	0	4	40	4	40	40	4	76
Roxboro*	0	5	0	5	0	0	5	5	0	10	9	0	19	0	0	19
Sutton	0	11	0	11	5	0	16	12	0	28	21	0	49	7	0	56
Weatherspoon	0	5	0	5	0	0	5	0	0	5	29	0	34	0	0	34
	0	21	0	21	9	0	30	37	0	67	175	5	237	54	5	286

Wells with an unknown date of installation not included in the table shown above.

\*1979 Mayo Floyd Report indicated that wells were installed at Roxboro and Mayo in 1978.

Site	2015			2016			2017			2018			In Place Today		
	New	Abandoned	New Total	New	Abandoned	New Total	New	Abandoned	New Total	New	Abandoned	New Total	New	Abandoned	New Total
Asheville	64	10	82	12	11	83	22	0	105	14	0	119	2	3	118
Cape Fear	34	0	64	8	3	69	4	0	73	2	0	75	0	1	74
HF Lee	29	0	54	37	1	90	9	0	99	4	0	103	0	0	103
Mayo*	21	0	34	20	0	54	4	2	56	32	1	87	19	1	105
Mayo Monofill	0	0	5	13	0	18	13	0	31	0	0	31	0	0	31
Robinson	4	0	80	14	1	93	0	24	69	9	0	78	9	0	87
Roxboro*	40	0	59	59	0	118	18	0	136	4	4	136	23	0	159
Sutton	45	2	99	77	0	176	41	43	174	8	0	182	21	12	191
Weatherspoon	17	0	51	11	3	59	7	9	57	18	0	75	1	0	76
	254	12	528	251	19	760	118	78	800	91	5	886	75	17	944

Public Staff calculated fields

	CAMA	CCR	SOLID WASTE	VOLUNTARY	MULTI-PROGRAM	UNKNOWN	OTHER	TOTAL
Asheville	109	12	7	0	0	0	12	140
Cape Fear	48	0	0	11	0	0	18	77
HF Lee	48	25	0	4	6	0	21	104
Mayo	52	44	0	4	0	0	8	108
Mayo Monofill	0	13	18	0	0	0	0	31
Robinson	0	26	4	0	6	0	44	80
Roxboro	97	47	9	0	0	0	10	163
Sutton	81	86	0	0	26	0	49	242
Weatherspoon	40	14	0	0	0	0	35	89
Total	475	267	38	19	38	0	197	1034

Public Staff calculated fields