

BLACK HILLS POWER, INC.  
d/b/a BLACK HILLS ENERGY  
EL19-006

REQUEST DATE : 02/26/19

RESPONSE DATE : 3/11/19

REQUESTING PARTY: Staff

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**SDPUC Request No. 1.14:**

Refer to pages 5 and 6, are there any increased safety concerns with locating an electric substation on top of an area with a previous oil leak? Is the risk of fire elevated due to the previous leak?

**Response to SDPUC Request No. 1.14:**

Black Hills does not anticipate any safety concerns or an increased fire risk due to the location of the substation. American Engineering Testing conducted a Phase II assessment of the substation site in May 2018 to identify the distribution of petroleum Hydrocarbons in the soil. Ten soil samples were collected from soil borings (B1-B10) and analyzed for the presence and concentration of TPH-D and naphthalene. The concentration of hydrocarbons triggering Tier I/Action Levels is not present at the Project site until 5 to 6.5 feet below grade. The top several feet of soil consists of fill material derived from the Spearfish Formation. These solids did not exhibit hydrocarbon odors and did not appear stained. Due to the fill material and depth of contaminated soil triggering action levels an increased fire risk is not anticipated.

Potential hydrocarbon impacted soils and groundwater impacted during the project excavation activities will be removed and disposed of at a properly permitted solid waste landfill. This remediation effort will be coordinated with the SD DENR to ensure proper removal and disposal.

The substation is designed with 6” compacted backfill of soils classified as silty clays to provide secondary containment, control unanticipated leaks and mitigate hazards during operation.

**Attachments:** None

**Responder:** Tim Rogers