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Sent: Wednesday, March 1, 2017 10:28 AM

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Subject: Well Plugging Plan for KAFB-106MW2 and Requirement to Submit Work Plans

Hello:

It is NMED's understanding that the Air Force recently abandoned the original borehole for KAFB-106MW2. The Air Force was in the process of abandoning the borehole when the New Mexico Office of the State Engineer alerted the NMED and requested clarification on the borehole abandonment plan in their review. At the time of the OSE phone call, NMED had not received a work plan from the Air Force to: A) Provide field methods to abandon the borehole; and B) Obtain NMED approval to abandon the borehole and the proposed methods for abandonment. NMED verbally informed the Air Force of the need for the work plan on February 13, 2017 and sent an email requesting submittal of the work plan on February 14, 2017.

On February 14, 2017 NMED received a call and not only was borehole abandonment in progress, but there was an issue in the field with an incorrect grout mixture being placed in the borehole. NMED received a document on Friday, February 24, 2017, nearly two weeks after the well abandonment was completed which does not include the original plan for borehole abandonment but instead what was done to adjust the plan in response to the incorrect grout mixture. The net result is an incomplete administrative record and at-risk work completed by the Air Force without prior complete consultation with NMED.

Per Sections 1.38, Work Plans and Other Deliverable Documents, Section 6.5.17.10, Groundwater Monitoring Well Construction Requirements, and Section 6.5.17.10.9, the Air Force is required to submit work plans prior to the start of work. Specifically:

"The Department must approve in writing all drilling locations, monitoring well and piezometer construction and installation details, sampling depths, and abandonment activities prior to the start of these activities." (Section 6.5.17.10; emphasis added)

NMED considers the failure to submit work plans for review and approval of proposed activities, including well abandonment, to be noncompliance with the Permit and is therefore subject to enforcement action (Section 1.38).

The Air Force must submit the original work plan, modifications of the work plan, and an explanation of the activities to date for the abandonment of the well no later than March 8, 2017.

KAFB4576



If you have any questions regarding the requirement to submit work plans, please do not hesitate to contact John Kieling (505-476-6035) or me.

Diane

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