

**Maggie Hart Stebbins**  
Bernalillo County Commissioner  
District 3

 **ENTERED**  
**Pat Davis**  
Albuquerque City Councilor  
District 6

July 12, 2018

Mr. Dennis McQuillan  
New Mexico Environment Department  
Harold L. Runnels Building , Suite N4050  
1190 St. Francis Drive  
Santa Fe, New Mexico 87505



Dear Mr. McQuillan,

Thank you for taking the time to present the 2018 Strategic Plan for cleanup of the Kirtland Air Force Base (KAFB) Bulk Fuels Facility (BFF) leak site to the to the Albuquerque Bernalillo County Water Utility Authority (Water Authority) governing board on March 21, 2018.

We appreciate the time and effort you invested in the presentation and in making subsequent revisions to the 2018 Strategic Plan. However, as the county and city officials elected to represent the affected area, we remain deeply concerned about the apparent breakdown in transparency and the stakeholder collaborative process.

Of particular concern are the apparently closed-door discussions between the Air Force and the New Mexico Environment Department (NMED) regarding the Air Force's Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report (submitted in January 2017). During your March 21st board presentation, you stated that the RFI Report would be resubmitted as a "Phase I RFI Report" – implying that NMED had already provided comments and feedback to the Air Force and that these had been incorporated into the revised report. These comments and feedback have not been made public, although we have received a copy of a draft disapproval letter (obtained, we understand, via an IPRA request) dated January 19, 2018. This draft NMED letter includes multiple, substantive comments on the RFI Report that should, in my opinion, be formally submitted for inclusion in the official record documenting NMED's concerns. That its contents likely would not have been publicized absent the IPRA request is troubling to say the least.

A second example of an apparent breakdown in the collaborative process is the adoption by the Air Force, without stakeholder input, of new modeling software (FEFLOW) for plume capture zone analysis. The new modeling approach completely abandons the U.S. Environmental Protection Agency (EPA) and CB&I model that was constructed over two years with stakeholder input, essentially hitting the "reset" button on a substantial amount of effort put forth by the Water Authority, the City of Albuquerque, EPA, and NMED. The proprietary nature of FEFLOW combined with its inability to "talk" to other modeling software and the abandonment of the consensus-based model seems like a substantial loss in transparency and



an inefficient use of taxpayer dollars. Does the NMED have access to a FEFLOW license to provide a complete model review? And, what is the plan for integrating the FEFLOW model with other accepted models for the site?

At the March 21<sup>st</sup> meeting we raised our concerns about the pump and treat system, specifically the discrepancy between the expected pumping rates used in the plume capture model and the rates reported by KAFB that show rates as low as 41% of “expected gpw”. It is imperative that stakeholders know whether the system is working as hoped – with all extraction wells running according to the model. Can NMED explain the difference between the pumping rates and the potential impact on the effectiveness of the plume capture model? Are the wells able to operate at variable rates for system optimization?

With respect to project timelines, it is critical that NMED publish – and publicize – a realistic schedule including deadlines for the cleanup project. Your March 21st board presentation did not indicate when the Phase I and Phase II RFI Reports will be submitted to NMED and what data would be collected and reported. When can we expect to see an updated schedule with those deadlines? We also respectfully request clarification on the timing of data collection, reporting, and a timeline for the filling of remaining data gaps.

Finally, we remain concerned about the lack of information from NMED regarding the team it has assigned to deal with the KAFB spill. An organizational chart for the NMED team, along with resumes of team members, would go a long way in providing reassurance that cleanup remains a priority despite the recent staffing changes for both the NMED and the Air Force.

We look forward to hearing from you as we continue working together to protect the drinking water of Albuquerque and Bernalillo County.

Sincerely yours,



Maggie Hart Stebbins

Bernalillo County Commissioner, District 3



Pat Davis

Albuquerque City Council, District 6