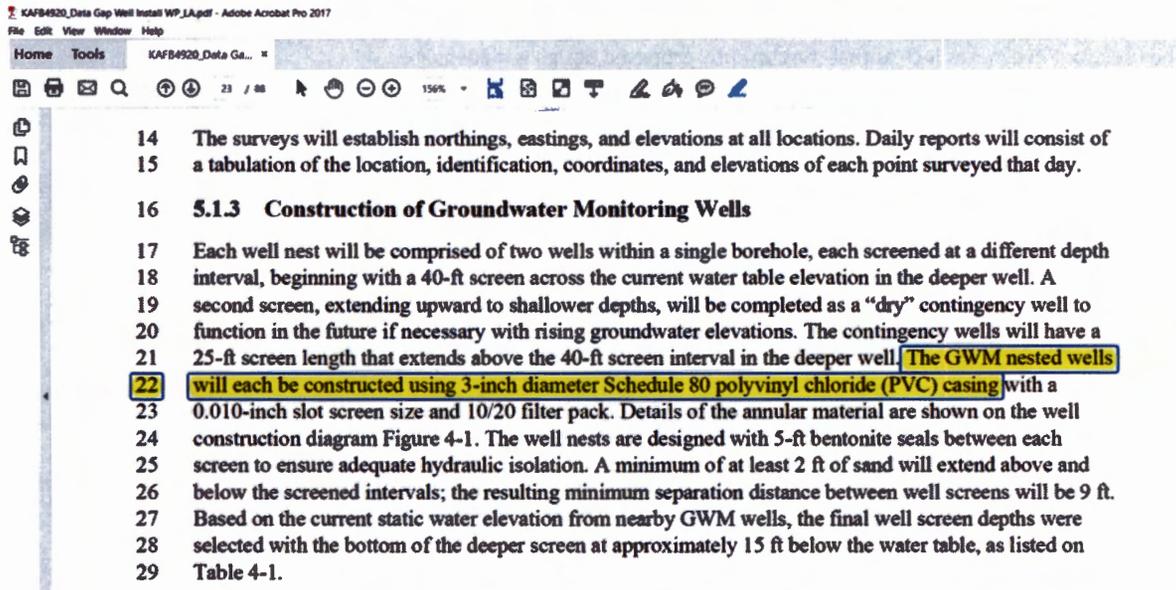




**From:** [Andress, Lane, NMENV](#)  
**To:** [Pierard, Kevin, NMENV](#); [Cobrain, Dave, NMENV](#); [Murphy, Robert, NMENV](#); [Wear, Benjamin, NMENV](#)  
**Subject:** RE: data gap letter  
**Date:** Thursday, June 25, 2020 9:16:30 AM  
**Attachments:** [image002.png](#)

Kevin,

To answer your question, yes, the work plan had 3-inch wells. Here is a snip from the approved old 2017 work plan:



**From:** Andress, Lane, NMENV  
**Sent:** Thursday, June 25, 2020 9:09 AM  
**To:** [Pierard, Kevin, NMENV](#) <[Kevin.Pierard@state.nm.us](mailto:Kevin.Pierard@state.nm.us)>; [Cobrain, Dave, NMENV](#) <[dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)>; [Murphy, Robert, NMENV](#) <[Robert.Murphy@state.nm.us](mailto:Robert.Murphy@state.nm.us)>; [Wear, Benjamin, NMENV](#) <[Benjamin.Wear@state.nm.us](mailto:Benjamin.Wear@state.nm.us)>  
**Subject:** RE: data gap letter

Here is the approval letter.

**From:** [Pierard, Kevin, NMENV](#) <[Kevin.Pierard@state.nm.us](mailto:Kevin.Pierard@state.nm.us)>  
**Sent:** Thursday, June 25, 2020 9:06 AM  
**To:** [Cobrain, Dave, NMENV](#) <[dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)>; [Andress, Lane, NMENV](#) <[Lane.Andress@state.nm.us](mailto:Lane.Andress@state.nm.us)>; [Murphy, Robert, NMENV](#) <[Robert.Murphy@state.nm.us](mailto:Robert.Murphy@state.nm.us)>; [Wear, Benjamin, NMENV](#) <[Benjamin.Wear@state.nm.us](mailto:Benjamin.Wear@state.nm.us)>  
**Subject:** RE: data gap letter

All we need to know is did NMED approve installation of smaller diameter wells in this or a previous workplan and did NMED approve use of PRBs in this or previous workplans. There is a reference to a 2017 workplan that they use as the basis for the proposed design. I assume that workplan was approved. The response you provide is an argument in support of requiring the larger diameter wells and active sampling but it does not answer my question. The past approvals don't apply to future work, and we have a valid rationale for changing the specs, but we need to know specifically about the past approvals to prepare for the blowback that may come. The comment itself is unlikely to be changed but I need to provide the answer to the question.

**From:** [Cobrain, Dave, NMENV](#) <[dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)>  
**Sent:** Thursday, June 25, 2020 8:07 AM  
**To:** [Pierard, Kevin, NMENV](#) <[Kevin.Pierard@state.nm.us](mailto:Kevin.Pierard@state.nm.us)>; [Andress, Lane, NMENV](#) <[Lane.Andress@state.nm.us](mailto:Lane.Andress@state.nm.us)>; [Murphy, Robert, NMENV](#) <[Robert.Murphy@state.nm.us](mailto:Robert.Murphy@state.nm.us)>; [Wear, Benjamin, NMENV](#) <[Benjamin.Wear@state.nm.us](mailto:Benjamin.Wear@state.nm.us)>

KAFB5123



**Subject:** RE: data gap letter

Regardless of whether or not NMED approved installation of smaller diameter wells, these wells are close to the source and will very likely be used for other actions in addition to sampling. For example, PRBs cannot be used in some kinds of tracer tests or to collect samples assessing bioremediation so the ability to pump from the wells is essential. EPA guidance states that PRBs should not be used where there's free product. Even if NMED has approved the use of PRBs, if subsequent data demonstrate that the PRBs don't produce comparable or defensible data, then a change has to be made but that's irrelevant to the installation of these wells. Unless the objective is to implement a passive remedy at the site, these wells need to be designed for multiple uses and Kate's assertion is that these 3-inch diameter wells can only be used for PRBs makes it clear that the currently proposed design is inadequate.

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**From:** Pierard, Kevin, NMENV <[Kevin.Pierard@state.nm.us](mailto:Kevin.Pierard@state.nm.us)>

**Sent:** Wednesday, June 24, 2020 5:21 PM

**To:** Cobrain, Dave, NMENV <[dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)>; Andress, Lane, NMENV <[Lane.Andress@state.nm.us](mailto:Lane.Andress@state.nm.us)>; Murphy, Robert, NMENV <[Robert.Murphy@state.nm.us](mailto:Robert.Murphy@state.nm.us)>

**Subject:** RE: data gap letter

Not yet. The only concern is that we approved the construction of smaller diameter wells and possibly PDBs in the workplan or the previous workplan from 2017(?)

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**From:** Cobrain, Dave, NMENV <[dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)>

**Sent:** Wednesday, June 24, 2020 5:16 PM

**To:** Pierard, Kevin, NMENV <[Kevin.Pierard@state.nm.us](mailto:Kevin.Pierard@state.nm.us)>; Andress, Lane, NMENV <[Lane.Andress@state.nm.us](mailto:Lane.Andress@state.nm.us)>; Murphy, Robert, NMENV <[Robert.Murphy@state.nm.us](mailto:Robert.Murphy@state.nm.us)>

**Subject:** RE: data gap letter

Kevin,

Did anyone get back to you? Kate's claim is that they've installed 3-inch wells for PRB sampling and that they can't install pumps in those wells. It's not accurate but since that's her claim, in response we're asking for wells to be installed that can accommodate a pump. Even if we were to allow the use of PRBs, when you're installing a \$500K well, it would be shortsighted not to install a well that could be used for more than one thing. If a pilot test was conducted that required a different sampling method or some other use, limiting the options for future use is unwise since that could mean it would be necessary to install another well with a different construction at the same location. Either way, Kate's assertion isn't correct but it's easier to call her bluff and require a larger diameter well than argue with her about this.

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**From:** Pierard, Kevin, NMENV <[Kevin.Pierard@state.nm.us](mailto:Kevin.Pierard@state.nm.us)>

**Sent:** Wednesday, June 24, 2020 4:06 PM

**To:** Andress, Lane, NMENV <[Lane.Andress@state.nm.us](mailto:Lane.Andress@state.nm.us)>; Murphy, Robert, NMENV <[Robert.Murphy@state.nm.us](mailto:Robert.Murphy@state.nm.us)>; Cobrain, Dave, NMENV <[dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)>

**Subject:** data gap letter

Stephanie has one concern – please let me know as quickly as possible

Kevin Pierard, Chief  
Hazardous Waste Bureau  
NM Environment Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM. 87505  
(505) 476-6035  
[kevin.pierard@state.nm.us](mailto:kevin.pierard@state.nm.us)