

General



State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
134 State Road 4, Suite A
TA 00-1313

White Rock, New Mexico 87544
Telephone (505) 672-0443 Fax (505) 672-0466

BILL RICHARDSON
GOVERNOR

RON CURRY
SECRETARY

DERRITH WATCHMAN MOORE
DEPUTY SECRETARY

April 20, 2006

Mr. Gene Turner, DOE/AIP/POC
Department of Energy
Los Alamos Site Office, MS A316
Los Alamos, NM 87545

RE: REPORT REVIEW - NMED DOE Oversight Bureau Comments concerning LANL's Requirement #3 Maps of the Compliance Order specified in Section IV "FACILITY INVESTIGATION, IV.A.2 General Facility Information, item #4." (Proceeding Under the New Mexico Hazardous Waste Act §§ 74-4-10.1 and 74-4-13, November 26, 2002)

Dear Mr. Turner:

The New Mexico Environment Department DOE Oversight Bureau (DOE OB) is submitting this review of LANL's Requirement #3 Maps under the AIP. Item #4 of the Compliance Order "Section IV "FACILITY INVESTIGATION, IV.A.2 General Facility Information", specifies maps and tables indicating the surveyed coordinates and locations of all existing springs, wells, and surface water gaging stations.

The comments presented here are intended solely as recommendations or discussion points for DOE, LANL and NMED, not as an official NMED Regulatory Bureau response concerning legal requirements. The reader should be aware that this commentary is better suited to an audience having prior technical knowledge of LANL's Regional Aquifer monitoring program.

Please address any technical questions to Michael Dale in our White Rock office at 672-0449 (mdale@lanl.gov). If you have any other questions please feel free to contact me at (505) 672-0448 (syanicak@lanl.gov).

Sincerely;

A handwritten signature in cursive script that reads "Stephen Yanicak".

Steve Yanicak
POC/Manager

Enclosure

SY/sy



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April 20, 2006
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cc w/enclosure: Mat Johansen, DOE LASO, MS A316
 Jean Dewart, LANL, ENV-ERS, MS M992
 John Volkerding, NMED, Acting Chief, DOE OB
 John Young, NMED, HWB
 File, NMED DOE OB, White Rock/Santa Fe

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Summary and Recommendations: The DOE Oversight Bureau (DOE OB) reviewed LANL's regulatory deliverable, per the NMED Compliance Order, specified under IV. FACILITY INVESTIGATION, IV.A.2 General Facility Information, item #4. The LANL deliverable is specific to maps illustrating all wells and springs located at and near LANL. The map depicting springs is up to date and accurate except for several springs that were discovered in 2005 since the map was submitted to HWB (e.g., Pine Rock Spring)

The Bureau's review of the well-location map indicates that many wells and deep subsurface penetrations at LANL are missing. For example, the following wells (and probably much more), etc., are missing from the map:

H-19 (This 2000' well may have been plugged with a telephone pole)

GT-2 and GT-3 (test wells in lower Guaje/Los Alamos Canyons)

LA-1, LA-3, LA-4, and LA-6

Otowi House Well

Halladay House Well

Totovi Highway Dept. wells

RGT-wells

Fenton Hill wells

TH-5, TH-6, TH-7

Beta Hole

EGH-LA-1

TA-46 C-13 holes (700'+ wells)

HydroTesting boreholes

CMR boreholes

TW-2B

DT-5

DT-5P

Our findings indicate that this deliverable may lack some information that NMED may find useful. We recommend that LANL up-date the current well-locations map so that it accurately depicts all subsurface penetrations that exist at LANL and the surrounding area. Note that some of the above mentioned wells, boreholes, etc., have probably been plugged and abandoned while many have not; nevertheless, depending on the user of this information, it is better to depict all penetrations, plugged or not, on the map. We suggest the following criteria for the well-location map:

- all cased wells/piezometes, plugged or not;
- all alluvial penetrations/boreholes greater than 10 feet;
- all mesa-top penetrations/boreholes, plugged or not, greater than 50 feet.