

New Mexico Health and Environment Department

DENNIS BOYD

Secretary

MICHAEL J. BURKHART

Deputy Secretary

FLORENCERUTH J. BROWN

General Counsel

LOUIS W. ROSE

Deputy General Counsel

September 19, 1989

Joyce Hester Laeser, Esq.
Counsel
U.S. Department of Energy
Albuquerque Operations
Los Alamos Area Office
Los Alamos, New Mexico 87544

Michael Yesley, Esq.
Office of Laboratory Counsel
Los Alamos National Laboratory
Post Office Box 1663
Mail Stop A187
Los Alamos, New Mexico 87545

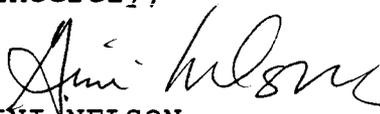


Re: In the Matter of Compliance Orders Docket No. 880801
and 880801-A, Hearing No. 89-01

Dear Ms. Laeser and Mr. Yesley:

Enclosed please find the Environmental Improvement Division's responses to the Department of Energy's and University of California's discovery requests as made in a letter dated September 12, 1989 from Joyce Laeser to me. EID understands its continuing obligation to supplement such discovery requests.

Sincerely,


GINI NELSON
Assistant General Counsel

Enclosures

cc: Boyd Hamilton

discrep.gnl



BEFORE THE DIRECTOR OF THE
ENVIRONMENTAL IMPROVEMENT DIVISION
OF THE NEW MEXICO HEALTH AND ENVIRONMENT DEPARTMENT

In the Matter of
Compliance Orders
Docket Nos. 880801 and 880801-A

DOCKET NO. 89-01

EID RESPONSE TO RULE 302 REQUEST FOR IDENTITY OF WITNESSES

The following are the names and addresses of witnesses EID has identified to date:

Boyd Hamilton
Hazardous Waste Program
Harold Runnels Building
Room N2312
Santa Fe, NM 87503

Kelley Crossman
Hazardous Waste Program
Harold Runnels Building
Room N2311
Santa Fe, NM 87503

John Gould
1606 ABW/EMI
Kirtland Air Force Base, NM 87117-5000

Michael Michaud
Acting Chief, RCRA Inspection Branch
U.S. Environmental Protection Agency
1445 Ross Ave.
Dallas, TX 75202

Sincerely,



GINZ NELSON
Assistant General Counsel

witn.gnl

BEFORE THE DIRECTOR OF THE
ENVIRONMENTAL IMPROVEMENT DIVISION
OF THE NEW MEXICO HEALTH AND ENVIRONMENT DEPARTMENT

In the Matter of
Compliance Orders
Docket Nos. 880801 and 880801-A

DOCKET NO. 89-01

EID RESPONSE TO RULE 303 REQUEST FOR DOCUMENTS

As discussed with Michael Yesley by telephone on September 19, 1989, EID will provide the Department of Energy and the University of California access to documents at 9:15 a.m. on Friday, September 29, 1989 at EID's offices in the Harold Runnels Building.

Sincerely,



GINI NELSON
Assistant General Counsel

docum.gnl

BEFORE THE DIRECTOR OF THE
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OF THE NEW MEXICO HEALTH AND ENVIRONMENT DEPARTMENT

In the Matter of
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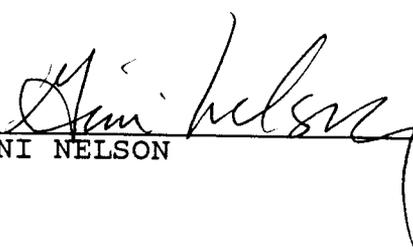
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CERTIFICATE OF SERVICE

I hereby certify that copies of EID's (1) Response to the United States Department of Energy's and the University of California's Request for the Identity of Witnesses under Rule 302; and 92) Response to the United States Department of Energy's and the University of California's Request for Documents Under Rule 303 were mailed by first class mail on this 19th day of September, 1989, to the following:

JOYCE LAESER
Counsel
U.S. Department of Energy
Albuquerque Operations
Los Alamos Area Office
Los Alamos, NM 87544

MICHAEL YESLEY
Staff Attorney
Los Alamos National Laboratory
Office of Laboratory Counsel
P.O. Box 1663, Mail Stop A187
Los Alamos, NM 87545


GINI NELSON