

Offsite

ENTERED

LANL  
Groundwater  
Buckman Wellfield

Page 1 of 1

**Cobrain, Dave, NMENV**

**From:** PUGLISI, ALEX A. [aapuglisi@ci.santa-fe.nm.us]

**Sent:** Wednesday, March 23, 2011 4:42 PM

**To:** Cobrain, Dave, NMENV

**Cc:** Dale, Michael, NMENV

**Subject:** FW: Buckman groundwater monitoring

Dear Mr. Cobrain:

Thank you for the opportunity to comment on "LANL's Request for Extension for the Buckman Well Field Alternative Monitoring Project". As you know, the City of Santa Fe has been working with LANL to support their use of SF piezometers #2-#5 as monitoring points in the Buckman Well Field. As stated in LANL's March 17, 2011 letter, provided in your Email, the City has made an assumption of ownership of these piezometers. This ownership would logically result from the transfer of ownership (sale) of the water system, and associated facilities, from PNM to the City of Santa Fe. City staff traveled to the sites of these piezometers with LANL on February 28, 2011, to evaluate their condition and their actual physical locations. LANL was given verbal approval to access these piezometers and was provided a new key to open the locked covers to the piezometers during this joint visit. It was our understanding that it was LANL's desire to move forward with the process of redeveloping these piezometers, as evidenced by a preliminary scope of work which was provided to us on March 11, 2011. It is our understanding, based on statements made by LANL, that this work plan had already been negotiated with the NMED Hazardous Waste Bureau.

It is the City's desire to continue to participate with LANL in the development of monitoring wells at the location of the SF 2-5 piezometers. We believe that the use and continued monitoring of these wells will be valuable in our operation of the Buckman Well Field and the protection of the City's groundwater source supplies. Although, the Buckman wells have not been used in recent months, this situation was primarily due to the introduction of significant quantities of water during the start-up period of the Buckman Regional Water Treatment Facility (formerly referred to as the Buckman Direct Diversion) into our distribution system. These wells have now been used several times over the past two weeks and will continue to be integrated into the City's water supply as the result of increased customer demand in warmer months, below normal snowfall levels, and the leveling off of produced flows from the Buckman Regional Water Treatment Facility.

The City understands the need for LANL's request for an extension of time, beyond the current stipulated date of April 1, 2011, to submit the determination on the suitability of the piezometers in the Buckman Well Field to the NMED. This additional time will allow LANL to address issues such as owner/operator agreements and the possible need to submit a Notice of Intent to Discharge (NOI) to the NMED Ground Water Quality Bureau for anticipated discharges of development and purge water. Therefore, we would support NMED's determination and issuance of an appropriate time extension to LANL.

Thank you for providing the City of Santa Fe with the opportunity to provide comments with respect to this issue. Please keep us informed of any NMED decisions related to this issue. We would also appreciate the opportunity to be present at any meetings scheduled with LANL for further discussion of their request and/or work plan.

If you have any questions, please feel free to contact me at 955-4232.

Alex Puglisi

34414



3/23/2011