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Date: MAR 3 1 2011
Refer To: EP2011-0134

James Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Revised Request for Extension for the Buckman Well Field Alternative Monitoring Project

Dear Mr. Bearzi:

Los Alamos National Laboratory (the Laboratory) has received the March 30, 2011, denial of the March 17, 2011, extension request for the Buckman Well Field Alternative Monitoring Project. We are providing supplemental information regarding the basis for the extension request and have provided an alternate submittal date for the Alternative Monitoring Project Report.

As the New Mexico Environment Department (NMED) has confirmed, the City of Santa Fe has recently verbally agreed to accept ownership of the wells. The U.S. Department of Energy (DOE) is currently working to formalize an agreement with the City of Santa Fe to conduct the scope of work NMED requires. NMED is correct that DOE and Los Alamos National Security (LANS) have previously accessed the piezometers to assess their condition. However, NMED's requirement that DOE/LANS attempt to dislodge and remove debris and obstructions from the piezometers before sampling has a potential to damage one or more piezometers. This represents a level of liability greater than that associated with the Laboratory's previous access, necessitating an additional formality.

In its March 30, 2011, letter, NMED stated the City of Santa Fe has indicated its support for the assessment of the piezometers for groundwater monitoring purposes, because the Buckman wells could be used at any time at the sole discretion of the city. As explained in our March 17, 2011, letter, efforts are still underway with the City of Santa Fe to finalize an appropriate agreement consistent with this scope of work. Additionally, a notice of intent (NOI) to the NMED Groundwater Quality Bureau to manage development and purge water must be prepared and submitted. This submission will be coordinated with the City of Santa Fe.

DOE/LANS estimate that an agreement with the City of Santa Fe and the NOI will be completed by April 30, 2011. Execution of the scope of work, which includes multiple well cleanouts, two quarters of sampling and analysis for each well and a summary report, will commence shortly thereafter. Therefore, based on these schedule assumptions, DOE/LANS requests an extension to

submit the determination on the suitability of the piezometers in the Buckman well field for groundwater monitoring from the current due date of April 1, 2011, to September 30, 2011.

If you have any questions, please contact Ted Ball at (505) 665-3996 (tedball@lanl.gov) or Hai Shen at (505) 665-5046 (hshen@doeal.gov)

Sincerely,

Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,

George J. Rael, Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/CD/TB:sm

Cy: Raj Solomon, NMED, Santa Fe, NM
Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Hai Shen, DOE-LASO, MS A316 (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
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