



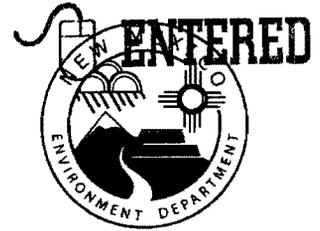
SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

Office
**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 30, 2011

George J. Rael
Assistant Manager
U.S. Department of Energy
National Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Rd, MSA316
Los Alamos, NM 87544

Michael J. Graham
Associate Director Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: DENIAL
REQUEST FOR EXTENSION
BUCKMAN WELL FIELD ALTERNATIVE MONITORING PROJECT
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-MISC-GW**

Dear Messrs. Rael and Graham:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and Los Alamos National Security, L.L.C.'s (collectively, the Permittees) document entitled *Request for Extension for the Buckman Well Field Alternative Monitoring Project* (Request) dated March 17, 2011 and referenced by EP2011-0122. NMED approved a work plan for the project in September 2010.

The Permittees request a time extension to submit a summary report, due on April 1, 2011, that determines the reliability of the Buckman Well Field piezometer nests for contaminant detection and groundwater monitoring in the vicinity of production wells Buckman #1 and #8 (Report). The Permittees cite difficulties in determining ownership of the piezometers and obtaining discharge permits from the Groundwater Quality Bureau, and uncertainties regarding the future use of production wells Buckman #1 and #8 as the reason for the extension. However, in the Request the Permittees state that the



City of Santa Fe agreed to accept ownership of the wells, a situation NMED independently confirmed. The Permittees also previously accessed the piezometers to assess their condition for the purpose of monitoring, which implies that access agreements have been reached in the past.

Use of the piezometers to monitor groundwater conditions and water quality will allow for the characterization of the groundwater flow system at the well field and may ultimately serve as a long-term network for the purpose of contaminant detection monitoring. The City of Santa Fe has indicated its support for the assessment of the piezometers for groundwater monitoring purposes, as use of Buckman wells could happen at any time at the sole discretion of the City.

NMED does not find good cause for the requested extension based on the grounds presented.

Regardless, Section III.J.2 of the March 1, 2005 Order on Consent (Order) requires that an extension request state the length of the requested extension and describe the bases for the request. The Permittees have not provided an alternate submittal date or the length of the requested extension in the request. NMED must therefore deny the Request solely on this basis.

Please contact me at (505) 476-6016 should you any have questions.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: R. Solomon, Deputy Cabinet Secretary, NMED
J. Kieling, NMED HWB
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
J. Kulis, NMED HWB
M. Dale, NMED HWB
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W. Alexander, EP-BPS, MS M992

Messrs. Rael and Graham
March 30, 2011
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H. Shen, DOE-LASO, MS A316
W. Woodworth, DOE-LASO, MS A316
A. Puglisi, City of Santa Fe, Sangre de Cristo Water Division

File: Reading and LANL 2011 – Extension Request for the Alternative Monitoring at the Buckman
Well Field, LANL-MISC-GW