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DEPARTMENT OF ENERGY
Environmental Management Los Alamos Field Office (EM-LA)
Los Alamos, New Mexico 87544

JUL 14 2015

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The Honorable James R. Mountain
Governor
Pueblo de San Ildefonso
02 Tunyo Po
Santa Fe, NM 87506

NMED
Hazardous Waste Bureau

Subject: Response to Pueblo de San Ildefonso, July 12, 2015 letter regarding the Proposed Well Design for Regional Aquifer Well SIMR-2

Dear Governor Mountain:

Thank you for the quick review and response to the Department of Energy's (DOE) proposed design for regional aquifer well SIMR-2. We understand that the Pueblo agrees with the well design proposed by DOE via email at 3:26 p.m. July 11, 2015 and that the New Mexico Environment Department (NMED) approved the proposed design through an email sent at 6:54 p.m. July 12, 2015. Specifically, DOE proposed a single-screen well with a 20-foot stainless-steel, 40 slot, wire-wrapped well screen extending from 885 feet to 905 feet bgs. We further understand the Pueblo supports NMED's recommendation to add an additional two feet of 20/40 transition filter-pack sand from depths 876 feet to 878 feet bgs, which will be incorporated into the final well design.

The Pueblo asked that DOE confirm that it will accept two conditions the Pueblo proposes in its letter: 1) the Pueblo "reserves the right to go to a dual screen system if the well is used for long-term monitoring," and 2) "prior to use of the injection well process, for any reason, the Pueblo shall be notified before future action."

With regard to the first condition regarding modifying SIMR-2 to utilize a dual screen system in the event the well is to be used for long-term monitoring, please note that pursuant to the Limited Access Agreement, we have committed that SIMR-2 not be used for long-term monitoring. Should NMED require DOE to use SIMR-2 for long-term monitoring, DOE and the Pueblo would have to enter into a new agreement. Additionally, DOE must comply with NMED requirements. Regarding feasibility of a future modification of SIMR-2 to employ dual screens, we do not believe a future modification to dual screens is technically feasible without adversely impacting the existing well.

As DOE EM-LA staff explained to Mr. Terry Aguilar, during a phone conversation on July 13, 2015, the depth of the SIMR-2 borehole cannot be increased further as the drilling shoe and the bottom five feet of drill string have been cut off and remain at the bottom of the hole. This means that a dual screen well would have to be installed within the 113 feet of the aquifer currently penetrated. Therefore, there would only be 45 feet of separation between the proposed screen interval and a second, lower screen. The lower screen could be no longer than 10 feet and the well sump would have to be shortened to 10 feet as well. Additional risks in installing dual screens are the potential for cross contamination from the upper screen to the lower screen, potential issues with packer separation between the screened intervals, along with the time and money necessary for additional development and aquifer testing. Neither DOE nor the NMED require a dual screen well to meet the mission of the well as currently described. Additionally, DOE feels that the depth

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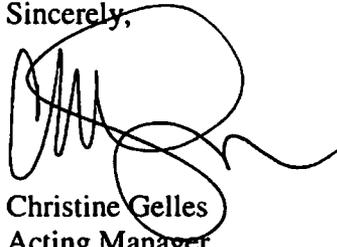
at which a second, deeper screen could be installed would not add benefit to a "long-term monitoring" effort related to overall plume remedy and therefore proposes to remain with a single screen well with the understanding that it would not be turned into a dual screen well at a later date.

With regard to the Pueblo's condition that it be notified prior to use of the injection well process, DOE would like to assure the Pueblo that there is no intent to change the purpose of SIMR-2 into an injection well. As presented to the Tribal Council on July 6, 2015, injection wells within DOE property have been identified and are being proposed as a measure to expedite the efficiency of halting potential offsite migration of the chromium plume. As presented, two of the six proposed injection wells are located near the boundary between Los Alamos National Laboratory and the Pueblo. As previously committed, DOE will continue to share information regarding the details of the Interim Measure and will notify the Pueblo prior to injection well operation. I would like to reiterate that the injection wells at the boundary are proposed as a means to expedite the halt of possible offsite migration of the chromium plume.

We are currently on stand-by status awaiting the Pueblo's confirmation of support for the well design, in light of DOE's response to the Pueblo's conditions. We respectfully request your timely attention to this matter, as the longer the borehole remains open in the current state, the greater the risk of complications during the completion of the well.

If there are any questions or concerns, please contact me at (202) 213-2454 as soon as possible in order to expedite this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Gelles", with a large, circular flourish above the name.

Christine Gelles
Acting Manager
Environmental Management
Los Alamos Field Office

cc:

Ryan Flynn
Secretary
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469

Michael Dale
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6313

Patrick Longmire
New Mexico Environment Department
Oversight Bureau, Los Alamos Field Office
P.O. Box 1663, MS-M894
Los Alamos, NM 87544

C. Rodriguez EM-LA
Records Center, EM-LA
Official Contract File, EM-LA

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