



State of New Mexico  
ENVIRONMENT DEPARTMENT  
DOE OVERSIGHT BUREAU  
P.O. Box 1663, MS/J-993  
Los Alamos, New Mexico 87545



GARY JOHNSON  
GOVERNOR

MARK E. WEIDLER  
SECRETARY

March 26, 1998

Mr. Mat Johansen, AIP POC  
U.S. Department of Energy  
Los Alamos Area Office  
528 35th St - MS A316  
Los Alamos, NM 87544

Re: Draft Field Implementation Plan for R-12 (Sandia Canyon)

Dear Mr. Johansen:

Enclosed please find our review of the subject document. Remarks are offered in the spirit of technical comment and do not reflect the regulatory position of NMED.

If you have any questions, please call William Stone (672-3151) or Michael Dale (672-0449) of our staff.

Sincerely,

Steve Yanicak  
POC/LANL

SY/sy

Enclosure

cc: Ted Taylor, DOE LAAO, MS A316  
Bonnie Koch, DOE LAAO, MS A316  
Allyn Pratt, LANL ER, MS J521  
Charles Nylander, LANL, ESH, MS K497  
Benito Garcia, NMED, Chief, HRMB  
Marcy Leavitt, NMED, Chief, GWQB  
John Parker, NMED, Chief, DOE OB

c:\..drafr12.wpd



5545

HSWA LANL 4/10/98/O/SANDIA

TL



*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
**DOE OVERSIGHT BUREAU**  
P.O. Box 1663, MS/J-993  
Los Alamos, New Mexico 87545



**GARY JOHNSON**  
GOVERNOR

**M E M O R A N D U M**

**MARK E. WEIDLER**  
SECRETARY

To: Steve Yanicak, NMED, DOE OB, POC/LANL  
From: William Stone, NMED, DOE OB  
Date: 11 March 1998 *WIS*

**Subject: Draft Field Implementation Plan for R-12 (Sandia Canyon)**

From a quick pass through this document (received 10 March and they wanted feedback today), I have only a few comments:

**SECTION 1.0 INTRODUCTION**

1. A map locating canyons and wells cited, would be helpful.

**SECTION 2.0 DRILLING PLAN**

2. p. 2-2 - The purpose of the "cellar" is not discussed.

**SECTION 3.0 WELL DESIGN**

3. p. 3-1 - If discrete sampling of the regional aquifer is anticipated, completion should involve alternating sealed-blank and filter-packed-screen intervals (packers can be set in two consecutive blank intervals and water sampled from the screen).

4. p. 3-2, **Filter Pack** - The sizing of the filter-pack is relative to a specified screen slot size, but the determination of that screen-slot size is not described. (EPA has guidance on this.)

5. p. 3-2, **Surface Completion** - Will the top of the concrete well pad at the surface be flat or slightly convex to promote drainage?

6. **Figure 3-1** - The top of the diagram seems wrong. The largest diameter hole should be that associated with the surface casing. Due to telescoping, the hole below this should be smaller. It looks as if surface casing was installed after a larger diameter hole was drilled to considerable depth (not normally done).

**SECTION 4.0 SAMPLING/ANALYSIS PLAN**

7. p. 4-10, **Slug Tests** - Was this procedure successful at R-9? Methods that do not require rig stand-by time are preferable (for example, standard pumping tests, borehole-dilution tests, etc.).

**SECTION 7.0 REPORTING**

8. Weekly progress reports, like Dave Broxton circulated for R-9, are most helpful and should be prepared for R-12 as well.