Dave- Thanks for the opportunity last Friday to discuss your email dated May 21, 2013 that provided NMED's preliminary comments on the Laboratory's interim measures work plan for chromium. In Friday's meeting you requested an explanation of why the Laboratory is proposing to schedule pumping at R-42 first instead of pumping first at R-28. You also requested confirmation that the Laboratory will be determining the long-term pumping rate at R-42 by pumping at different rates during the initial pumping phase.

The Laboratory's proposal to conduct pumping at R-42 first is based on two main reasons. First, the Laboratory found limited availability of frac tanks that will be used in the water-management methodology described in the Groundwater Bureau (GWB)-approved Temporary Discharge Permit. The Laboratory initiated procurement of tanks in April after funding was approved for the chromium project and under an assumption that the methodology presented in the request for a Temporary Discharge Permit would be acceptable to the GWB. The anticipated maximum pumping rate at R-42 will require three frac tanks, and those have arrived onsite and are staged at R-42. Eight additional frac tanks will be required for managing pumped water at R-28 and due to availability, those aren't scheduled to arrive until the late July-early August timeframe. The Laboratory is planning to leave the three tanks staged at R-42 in the event that both R-42 and R-28 will be pumped simultaneously later in the interim measures activities.

A second and beneficial reason for scheduling to pump first at R-42 is to establish the operational aspects of treating and dispositioning (via land application) the large volume of water that will be generated as part of the interim measures. Pumping is planned for 24-hr/7-day per week operations. The anticipated maximum daily volume at R-42 is approximately 12,000 gallons/day compared to approximately 40,000 gallons/day at R-28.

In regards to determining pumping rates at R-42, it is the Laboratory's plan to determine the long-term pumping rate at R-42 by "stepping-up" the initial pumping rates while monitoring water levels within the well. This will help ensure that the water table is sustained at an elevation above the top of the screen while maximizing the pumping rate for the hydraulic data-collection objectives described in the interim measures work plan.