



olo



ENTERED

AUG 31 2018

Environmental Protection & Compliance Division
Los Alamos National Laboratory
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

Date: **AUG 30 2018**
Symbol: EPC-DO: 18-283
LAUR: LA-UR-18-27487
Locates Action No.: N/A

Ms. Ramona Martinez
Northern Rio Grande Basin Manager
Office of the State Engineer
Water Rights Division District 6

Subject: Request for Variance, Well Plugging Plans of Operations RG-96831-POD25 (PCM-1), RG-96831-POD24 (PCM-2), RG-96831-POD22 (PCM-3), and RG-96831-POD21 (PCM-4)

Dear Ms. Martinez:

The four well plugging plans of operations referenced above were submitted by the Los Alamos National Security, LLC (LANS), Environmental Remediation Program (ER-ES) in April 2017. These plans were approved by the Office of the State Engineer (OSE) with specific plugging conditions in July 2017. The proposed plugging of these four boreholes (i.e. RG-96831-POD25 [PCM-1], RG-96831-POD24 [PCM-2], RG-96831-POD22 [PCM-3], and RG-96831-POD21 [PCM-4]) were part of a larger scope of work to plug 21 alluvial wells and 5 boreholes in the 2017 Work Plans package for the Plugging and Abandonment of Wells. Due to budget constraints, 11 wells and boreholes from the 2017 scope of work, which includes PCM-1 thru 4, were unable to be plugged and are scheduled for abandonment this year.

The information provided in the submitted Plugging Plans of Operations indicated that the four boreholes (i.e. PCM-1, PCM-2, PCM-3, PCM-4) were drilled in 1985 as test holes to define the northern extent of the alluvial aquifer in the lower reach of Pajarito Canyon. The test holes were drilled to total depths of 60 to 120 feet. All penetrations were dry and the 4.5-in. diameter holes were completed as moisture-access holes. The upper 7 to 10 feet of borehole was cased with 4-inch diameter PVC across unconsolidated alluvium/colluvium. The remainder of each borehole was left as open hole in consolidated Bandelier Tuff to facilitate neutron probe logging for moisture determination.

Prior to field mobilization the LANS Environmental Protection and Compliance Division (EPC-DO) respectfully requests a variance from the specific conditions identified in the OSE's July 2017 approval.

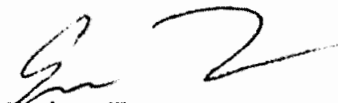


Specifically, EPC-DO proposes to execute the work for the four boreholes, as detailed below:

1. Tag boreholes to verify total depth, ensure bridging has not taken place and finalize grout calculations.
2. Pressure grout from total depth to ground surface via tremie pipe installed to full depth of each hole.
3. Over drill hole with 3.25-in. I.D./6-in. O.D. hollow stem augers to 20 ft bgs. or auger refusal.
4. Place grout from 20 ft to 2 ft bgs as augers are pulled, place concrete from 2 ft bgs to surface, and emplace survey marker in concrete.

The procedures described above have previously been used to plug and abandon wells and boreholes at the Laboratory and would substitute for the OSE requirement to re-drill the uncased, open hole to original depths. Sealant placed by the methods described above ensure a thorough seal and satisfy the intent of the original plugging plans. EPC-DO would request OSE concurrence to proceed with the plugging and abandonment of the four boreholes as described above. Please call Steven Pearson at (505) 667-3005 if you have questions or need additional information.

Sincerely,



Enrique Torres
Division Leader

ET/MTS/SGP:cmh

Copy: Michael Dale, LASO-SUP, (E-File)
Michael Saladen, EPC-CP, (E-File)
Tania Van Valkenburg, EPC-CP, (E-File)
Gabriel Vigil, MOF-CM-STR, (E-File)
Steven Pearson, EPC-CP, (E-File)
locatestream@lanl.gov (E-File)
adesh-records@lanl.gov (E-File)
epec-correspondence@lanl.gov, (E-File)

2019 AUG 30 PM 2:50