



NEW MEXICO
ENVIRONMENT DEPARTMENT



ENTERED



Hazardous Waste Bureau

BILL RICHARDSON
Governor

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RON CURRY
Secretary

DIANE DENISH
Lieutenant Governor

Phone (505) 476-6000 Fax (505) 476-6030

JON GOLDSTEIN
Deputy Secretary

www.nmenv.state.nm.us

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 22, 2009

David Gregory
Project Director, Environmental Operations
Los Alamos Site Office, Department of Energy
528 35th Street, Mail Stop A316
Los Alamos, NM 87544

David McInroy
Remediation Services Deputy Project Director
Los Alamos National Laboratory
P.O. Box 1663, MS M992
Los Alamos, NM 87545

RE: RESPONSE WITH DIRECTION TO REQUESTS FOR EXTENSION OF TIME
FOR COMPLETION OF WELL R-47
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-MISC-GW

Dear Messrs. Gregory and McInroy:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy and Los Alamos National Security, LLC (collectively, the Permittees) documents entitled *Request for Extension for Completion of Wells R-47 and R-48* (hereafter, Request #1) dated September 23, 2009 and referenced by EP2009-0491, and *Request for Extension of Time for the Completion of Well R-47* (hereafter, Request #2) dated October 14, 2009 and referenced by EP2009-0528.

In Request #1, the Permittees requested an extension of time for completion of wells R-47 and R-48 from the due dates of October 1, 2009 to October 23, 2009 because of unforeseen drilling conditions and an accident with injury that resulted in a stand-down. Subsequent to the submittal of Request #1, the Permittees completed well R-48 on September 25, 2009, before the original due date of October 1, 2009, but encountered additional difficulties with well R-47.

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In Request #2, the Permittees stated that, because of bentonite invasion into the well screen in well R-47, additional time was necessary to remove the well casing, clean the borehole, and reinstall the casing. The Permittees requested an extension of the due date for completion of well R-47 to November 12, 2009.

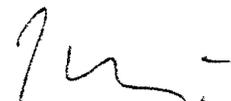
On October 19, 2009, the Permittees notified NMED by phone that they were unsuccessful in removing bentonite residue from the R-47 borehole and were seeking NMED approval to abandon the existing R-47 borehole and install a new well R-47 at a nearby location.

NMED concurs with Permittees that bentonite removal activities in the existing R-47 borehole will likely be ineffective and requires Permittees to perform the following actions:

1. The Permittees shall submit to NMED a drilling work plan for the new well R-47 by November 13, 2009. The work plan shall include a proposed location and drilling schedule.
2. Significant perched intermediate groundwater was encountered at a depth of about 840 ft below ground surface while drilling R-47. The Permittees shall assess the condition of the perched zone in the R-47 borehole by October 30, 2009 and, if that zone is productive and not contaminated by bentonite residue, install an intermediate well in the current R-47 borehole by November 30, 2009. The Permittees shall submit a proposed design for the intermediate well to NMED for approval before commencing the construction of the well.

Should you have any questions, please contact Jerzy Kulis of my staff at (505) 476-6039.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

BRZ:jk

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
K. Roberts, NMED HWB
M. Dale, NMED HWB
J. Kulis, NMED HWB
T. Skibitski, NMED DOE OB
S. Yanicak, NMED DOE OB, MS J993
B. Olson, NMED GWQB

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L. King. EPA 6PD-N
G. Rael. DOE LASO. MS A316
D. Katzman. EP-LWSP. MS M992
P. Huber. EP-LWSP. MS M992
H. Shen. DOE LASO. MS A316

file: Reading and LANL General (Groundwater General)