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GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 5, 2000

Dr. John C. Browne, Director
Los Alamos National Laboratory
P.O. Box 1663, MS-A100
Los Alamos, NM 87545

Mr. Theodore Taylor, Area Manager
Los Alamos Area Office-Department of Energy
528 35th Street
Los Alamos, New Mexico 87544

RE: CONCERNS REGARDING REGIONAL AQUIFER WELL R-25, LOS ALAMOS NATIONAL LABORATORY, NM0890010515

Dear Mr. Browne and Mr. Taylor:

This letter is to express concern regarding the construction of regional aquifer well R-25 and its use as a RCRA compliant monitoring well. The well is being installed as part of the Los Alamos National Laboratory's (LANL) Hydrogeologic Workplan (Workplan). The main objective of the Workplan is to characterize the hydrogeology beneath the Pajarito Plateau and secondarily to construct wells in a manner that will be able to compliment the monitoring of contamination from historic and current releases at LANL.

The Hazardous Waste Bureau (HWB) recommends plugging and abandoning R-25. Another acceptable approach would be to construct the well as a piezometer to monitor water levels at the top of the regional aquifer.



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ASWA LANL G/M/HWP/2000

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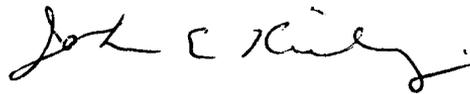
Our recommendation is based, but not limited to, the following:

- construction problems associated with the dropped tremie pipe/well integrity;
- the interconnection between the upper and lower saturated zones that has occurred over the last year and a half;
- the unusable nature of zones three and nine;
- infiltration of fines into the "usable" screens.

Due to the problems associated with R-25, we do not believe this well will be useful for environmental restoration (ER) and monitoring and surveillance activities in the foreseeable future because of the questionable quality of the groundwater chemistry resulting from the previously mentioned mishaps. *At this time, HWB will not accept data from R-25 for ER or monitoring and surveillance activities.* It is imperative for LANL to construct a replacement well upgradient of R-25, properly and in a timely manner for monitoring the groundwater downgradient of the 16-260 building/outfall than it is to expend any more time, money and effort on a well that is controvertible to the regulating agency. Our concerns are even more prudent due to the construction problems and potentially unacceptable geochemical data from the 16-260 "plume chasing" well, CDV-15-3.

Should you have any questions please call John Young at (505) 827-1558, extension 1036 or myself at 827-1561, extension 1012.

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK:jry

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cc: P. Allen, NMED HWB
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C. Will, NMED HWB
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