

Roberts, Kathryn, NMENV

From: Ann Sherrard [sherrard@lanl.gov]
Sent: Thursday, June 05, 2008 10:48 AM
To: Roberts, Kathryn, NMENV
Cc: Cobrain, Dave, NMENV
Subject: Re: land applying drill cuttings at MDA C

Thank you, Katie. As we previously discussed, land application was not identified in the work plans written before the decision tree was approved (e.g., MDA C) because it was not yet an option. With this approval from you, the NOI decision tree will supercede the work plans, where it is applicable. We are in total agreement with you: the NOI decision tree does NOT approve the use of drill cuttings to backfill boreholes. Thanks for your help.

Ann

At 10:23 AM 6/5/2008, Roberts, Kathryn, NMENV wrote:

Ann,

I received your voicemail this morning. I apologize that I haven't responded sooner. NMED concurs with the use of drill cuttings which meet the residential SSLs/SALs as well as the LDRs, for use as overburden, road construction material, etc. in accordance with the NOI decision tree. However, the Permittees cannot use the drill cuttings to backfill boreholes. It is NMED's position that the boreholes become preferential pathways for contaminant migration if not properly plugged and abandoned.

Please let me know if you have any questions.

Thanks,
Katie

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