

Public Service Company of New Mexico

*Will meet during week of
3/8 w/Ron discuss possibilities*

March 04, 1993



Certified Mail
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Ms. Jane Cramer
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, NM 87502

Dear Ms. Cramer:

Subject: Request For Deadline Extension,
Person Station Corrective Action
Directive, NMT360010342

The purpose of this letter is to formally request an extension for the deadlines associated with Phase I of the Person Station Corrective Action Directive (CAD). The current deadlines require submittal of cuttings/core logs on March 10, 1993, and the submittal of the Summary Report for the Assessment Phase and a Corrective Measures Technology Report on April 10, 1993.

We have made significant progress over the past few months and the groundwater analytical data we are currently collecting offer encouragement that we are near to delineating the extent of the contaminant plume in the shallow portion of the aquifer. As we discussed in our meeting of January 25, 1993, the current deadlines would not be sufficient to meet the delineation requirements of the CAD and a 2 month extension was subsequently suggested by the NMED. As it now appears that we are nearing delineation (based on the results from 3 of the 6 proposed newest wells), we feel it is time to formally request the deadline extension.

However, there are still confounding factors to any CAD extension. First, the CAD investigation has discovered that a second "deep plume" may exist in the vicinity of production wells PSPW-3 and PSPW-6. The complexity of a deep plume investigation precludes meeting any near term deadline if the assessment of the deep plume is linked with the original CAD. Second, even if the deep plume investigation were treated separately, an active investigation of the deep plume would place constraints on our resources and make it difficult to respond to a tight deadline for the original CAD.

Ms. Jane Cramer

- 2 -

March 04, 1993

Since we are actively pursuing delineation of the deep plume it will be difficult to successfully meet a 2 month extension. I would therefore request that the NMED consider instead granting a 3 month extension to the deadlines.

If approved, the three month extension would set the deadlines as follows:

June 16, 1993 - Cuttings/Core Logs Due to NMED

July 10, 1993 - Assessment Summary Report and Corrective Measures Technology Report Due to NMED

If you have any questions, please contact me at 848-2998.

Sincerely,



Ron D. Johnson
Sr. Environmental Scientist

RDJ:krl