

Steve

Public Service Company of New Mexico



April 23, 1993

Certified Mail
Return Receipt Requested

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: Response to Questions on Second Flow
Zone Monitor Well Installation and
Weekly Status Reports

Regarding our telephone conversation of April 20, 1993, this letter addresses the following two issues: 1) The installation of second flow zone ("B") monitor wells, and 2) The submittal of weekly status reports.

With regard to "B" flow zone monitor wells, it is PNM's intent to fully address the rationale for placement of these wells in the assessment summary report. The discussion will include where and why each well was placed and will include a detailed discussion of how and why placement may have varied from the CAD work plan.

With regard to status reports, it has always been our understanding, and we believe the understanding of previous NMED staff working on this project that the reports are intended to keep NMED informed of field activities, such as the installation or sampling of monitor wells. When no field activity is planned for the forthcoming week, the status report for the just completed week should have stated "no field activity planned" for the upcoming week.

In checking my records, status reports were sent to the NMED (by FAX and by mail) for the following periods:

- January 20, 1992 through May 22, 1992;
- July 13, 1992 through July 24, 1992;
- September 10, 1992 through September 25, 1992; and
- November 4, 1992 through the present.

Dates not covered are periods having no field activity. I have compared these dates with dates you sent to me and have concluded that the NMED has all status reports sent.

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Finally, it is becoming apparent that due to changes in NMED staff oversight on this project, certain common understandings between PNM and the NMED have been lost that may not have been documented through status reports, letters, etc. Therefore, it may be appropriate to document at this time the reasons for the gaps in the field activity shown above.

The gaps in field work from late May 1992 through November 1992 resulted from the following. As the CAD investigation proceeded toward I-25 the data seemed to indicate that the plume might terminate somewhere underneath the I-25 access control zone. Because of drilling restrictions associated with that property, PNM met with NMED staff to discuss the data and whether or not there was a real need to proceed further east. As a result of that meeting, PNM and the NMED felt that two additional wells would be needed: PSMW-23 (on the west side of I-25 and bounding the plume to the north), and PSMW-24 (on Ethicon property, and felt at that time to be directly downgradient of the plume). The NMED, PNM management, and the State Highway Department were all opposed to placing a well within the access control zone of I-25.

PSMW-23 was installed and sampled in mid July 1992 (status reports were submitted). It took over three months to obtain permission from Ethicon, Inc. and Johnson and Johnson, Inc. management, for the placement of PSMW-24 on their property. PNM and NMED were both actively involved in discussions with Ethicon to obtain the necessary permission. PSMW-24 was installed and sampled in mid September 1992 (status reports were submitted). The results indicated the need for additional wells, and it took another month to obtain permission from Ethicon to proceed and to schedule the drilling rig.

Since that time, the installation and sampling of wells on Ethicon property and UNM property has proceeded at a rapid pace.

Since these delays occurred prior to your involvement with this project, I hope that this information will be helpful to you in understanding events that occurred at that time.

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

Sincerely,



Ron D. Johnson
Sr. Environmental Scientist

RDJ:rdj