

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO



THE CITY OF ALBUQUERQUE and
THE BERNALILLO COUNTY
COMMISSIONERS, et al

Plaintiffs,

v.

SPARTON TECHNOLOGY, INC.,

Defendant.

FILED Civil Action No.
CIV 97 0206 LH/JHG
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

JUL 07 1998

Consolidated with:

CIV 97 0208 JC/RLP

CIV 97 0210 M/DJS

CIV 97 0981 LH/JHG

[Handwritten Signature]
CLERK
AGREED ORDER

Whereas, the United States, the State of New Mexico, the New Mexico Environment Department, the New Mexico Office of the Natural Resources Trustee, the Bernalillo County Commissioners, and the City of Albuquerque ("Plaintiffs") filed a Joint Motion for Preliminary Injunction; and

Whereas Sparton Technology, Inc. has agreed to entry of an Order requiring it to implement the attached Workplan, and in exchange, Plaintiffs have agreed to withdraw their Joint Motion for Preliminary Injunction;

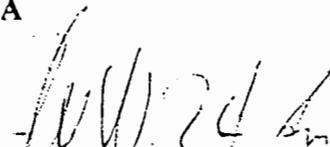
It is hereby **ORDERED** that Sparton Technology, Inc. shall implement the attached Workplan in accordance with the schedules and deadlines contained therein and that Plaintiffs' Joint Motion for Preliminary Injunction is withdrawn.

DONE this 7th day of July 1998.

Honorable Leroy C. Hansen
United States District Court Judge
District of New Mexico

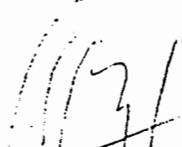
COPY

FOR THE UNITED STATES OF AMERICA



MICHAEL T. DONNELLAN, Trial Attorney
ARNOLD ROSENTHAL, Senior Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
United States Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
(202) 514-4226/(202) 514-3446

JOHN J. KELLY
United States Attorney



JOHN W. ZAVITZ
Assistant United States Attorney
District of New Mexico
P.O. Box 607
Albuquerque, NM 87103
(505) 766-3341

OF COUNSEL
GLORIA MORAN
Enforcement Counsel
United States Environmental Protection
Agency, Region 6
1445 Ross Ave.
Dallas, TX 75202

FOR THE STATE OF NEW MEXICO AND THE NEW MEXICO OFFICE OF THE
NATURAL RESOURCES TRUSTEE

TOM UDALL
Attorney General of New Mexico



CHARLES DE SAILLAN
Assistant Attorney General
Environmental Enforcement Division
Post Office Drawer 1508
Santa Fe, New Mexico 87504-1508
(505) 827-6939

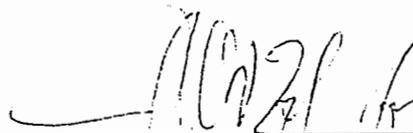
FOR THE NEW MEXICO ENVIRONMENT DEPARTMENT



ANA MARIE ORTIZ
Special Assistant Attorney General
Assistant General Counsel
New Mexico Environment Department
Post Office Box 26110
Santa Fe, New Mexico 87502-6110
(505) 827-2987

FOR THE CITY OF ALBUQUERQUE

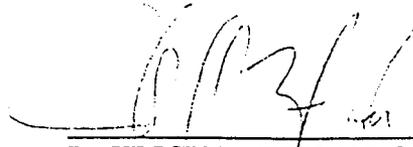
ROBERT M. WHITE
City Attorney



GARY A. O'DEA
ROSEMARY Q. COSGROVE
Assistant City Attorneys
Post Office Box 2248
Albuquerque, New Mexico 87103
(505) 768-4500

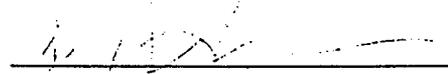
FOR THE BERNALILLO COUNTY COMMISSIONERS

TITO D. CHAVEZ
County Attorney

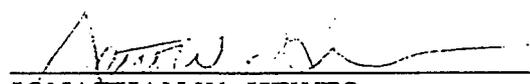


PATRICK F. TRUJILLO
Assistant County Attorney
One Civil Plaza, N.W., Tenth Floor
Albuquerque, New Mexico 87103
(505) 768-4655

FOR SPARTON TECHNOLOGY, INC.



JAMES B. HARRIS
Thompson & Knight
1700 Pacific Avenue, Suite 3300
Dallas, Texas 75201-4693
(214) 969-1700



JONATHAN W. HEWES
JAMES P. FITZGERALD
BRUCE HALL
Rodey, Dickason, Sloan, Akin & Robb, P.A.
P.O. Box 1888
201 Third St., N.W., Suite 2200
Albuquerque, New Mexico 87102
(505) 765-5900

**Work Plan For Installation of Additional Wells and Conducting a Pump Test
In the Area of The Leading Edge of The Contaminant Plume
Originating From The Sparton Technology, Inc. Coors Road Facility**

INTRODUCTION

This Work Plan shall be implemented by Sparton Technology, Inc. ("Sparton"). The work primarily consists of the installation of a monitoring well (MW 71) to further delineate the vertical extent of the off-site contaminant plume, the installation of a test well and two observation wells, the performance of a pumping test to obtain hydraulic parameters of the aquifer in the vicinity of the leading edge of the off-site contaminant plume, and a thirty day containment feasibility test.

For purposes of this Work Plan, the term "Plaintiffs" shall mean the following parties to the civil actions consolidated as City of Albuquerque v. Sparton Technology, Inc., No. CIV 97 0206 (D.N.M., filed February 19, 1997): the United States of America, the Environmental Protection Agency, the State of New Mexico, the New Mexico Office of the Natural Resources Trustee, the New Mexico Environment Department, the City of Albuquerque, and the Bernalillo County Commissioners. All references in this Work Plan to EPA analytical methods refer to the analytical methods set forth in *Test Methods For Evaluating Solid Waste, Physical/Chemical Methods, Integrated Manual*, SW-846 Final Update III, June 1997 and *Methods for Chemical Analysis of Water and Wastes*, EPA-600/4-79-020 Revised March 1983.

Sparton shall complete all work specified in this plan, including the final report, within twenty-two (22) weeks after issuance of a Court order requiring Sparton to implement this Work Plan or within four (4) weeks after completion of the containment feasibility test, whichever is earlier. Sparton shall prepare a written schedule for performance of the tasks set forth in this Work Plan. Sparton shall provide copies of that schedule to Plaintiffs and shall allow Plaintiffs to be present to observe the tasks being performed. If Sparton decides to modify the schedule, it shall provide reasonable notice of the modification to Plaintiffs. In no case shall "reasonable notice" be less than twenty-four hours in advance.

Groundwater at the Sparton facility is encountered at a depth of about 65 to 75 feet below ground surface and about 200 feet below ground surface west of the site. The direction of groundwater flow is generally to the northwest. The contaminants which have been detected include trichloroethylene ("TCE"), 1,1,1-trichloroethane ("TCA"), and 1,1-dichloroethylene ("1,1-DCE"). Chlorinated solvents have been detected in groundwater at distances in excess of one-half mile downgradient from the Sparton facility and in concentrations exceeding federal and state drinking waters standards. Various metals have also been detected in the groundwater. Of these metals, chromium has the highest frequency of occurrence at elevated concentrations.

I. CONTAMINANT PLUME CHARACTERIZATION

Monitoring Well 71

Sparton shall install a monitoring well ("MW 71") within fifty (50) feet of MW 60 to define the vertical extent of the contaminant plume at that location. The installation procedure for this well shall involve an iterative process. The well shall be drilled and a temporary screen ("the first screen") placed approximately 4850 to 4840 feet above mean sea level ("MSL") (approximately 89 feet below the bottom of the screen in MW 60) from which groundwater samples shall be collected for analysis.¹ If analysis shows that the groundwater sample collected from the first screen contains less than 50 parts per billion ("ppb") trichlorethylene ("TCE"), then the well shall be permanently screened at the level of the first screen. If analysis shows the sample from the first screen contains 50 ppb TCE or greater, then the well shall be re-drilled and a second temporary screen ("the second screen") placed at a depth approximately 4,795 feet MSL (approximately 134 feet below the bottom of the screen in MW60). A sample shall then be taken from the second screen, and if it contains less than 50 ppb TCE, then the well shall be permanently screened at the level of the second screen. If analysis shows that the sample from the second screen contains 50 ppb TCE or greater, the well shall be re-drilled additional increments of approximately fifty feet, a temporary screen installed, and a sample collected. This process shall continue until sampling shows contamination at less than 50 ppb TCE. The well shall then be completed and permanently screened at the depth at which contamination is less than 50 ppb TCE.

If TCE contamination of more than 4200 ppb is identified at any depth in MW 71, Sparton shall install a second monitoring well (MW 72) within fifty (50) feet of MW 60. The second well shall be drilled and screened at a depth equal to the depth at which the highest TCE concentration was found during the drilling of MW 71.

If during the installation of any monitoring well, a clay layer is encountered at an elevation below 4840 feet above MSL and Sparton determines that the clay layer is areally extensive, then the monitoring well will be completed using one of the two methods specified below. If a clay layer is encountered at an elevation below 4840 feet above MSL and Sparton determines that it is not areally extensive, Sparton shall notify Plaintiffs in writing; the notification shall state (1) that a clay layer was encountered and (2) the basis for Sparton's determination that the layer is not areally extensive. If Plaintiffs notify Sparton within twenty-four hours of receipt of Sparton's notification that Plaintiffs have determined that the clay layer is areally extensive, Sparton shall complete the monitoring well using one of the two methods specified below.

¹MW 60 is screened from 4948.62 feet to 4938.62 feet above mean sea level.

Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility

(1) Method 1: If the monitoring well is to be screened above the clay layer, then the bottom of the well hole will be plugged at least to the top of the clay layer with a mixture of 50% granules bentonite and 50% sand; or

(2) Method 2: If the monitoring well is to be screened below the clay layer, the casing will be cemented through the clay layer with five percent bentonite cement.

Sparton shall use EPA Method 8260 for volatile organics to analyze all samples collected during the work described in this Section I.

II. PUMP TEST

A. Installation of Test Well

Sparton shall drill a test well near the intersection of Chantilly and Benton Streets ("the test well"). The test well shall be located: (1) less than five-hundred feet north or south of that intersection and (2) within approximately five-hundred feet east of the intersection. The test well shall be at least six inches in diameter. The sand pack and well screen which Sparton installs in the test well shall be appropriately designed to maximize well efficiency. Sparton shall install a wire wrapped or a louvered metal well screen. The discharge line from the test well shall be equipped with a port to allow water samples to be collected for analysis. Sparton shall select the specific site for the test well within the area described above based on consideration of accessibility and resolution of any zoning law easement issues.

Sparton shall screen the test well down to the deeper of: (1) the deepest contamination detected at Well Cluster #9 (MW 48, 55, 56, and 67) or (2) the elevation at which less than 50 ppb TCE was first detected in MW 71. Sparton shall install the well screen so that the screen covers at least the lower two-thirds of the interval between the water table and the bottom of the well screen. If Sparton determines that a different elevation or screen length would be more appropriate, Sparton shall notify Plaintiffs. The screen elevation or length may be modified by mutual agreement of the parties.

Sparton shall develop the test well in order to maximize well efficiency. The method of development shall not alter the groundwater geochemistry and shall be the surge pumping method or equivalent.

During the drilling of the test well, Sparton shall collect cuttings approximately every five feet for stratigraphic interpretation. At the time of collection, the cuttings shall be microscopically examined and logged by a qualified groundwater professional from Metric

Corporation. Sparton shall retain the cuttings for at least two years and shall make them available to Plaintiffs for laboratory analysis upon request.

B. Installation of Observation Wells

Sparton shall install two wells to be used as observation wells during the pump test. The first observation well shall be located approximately 75 feet from the test well. The second observation well shall be located 150 to 250 feet from the test well. The two observation wells and the test well shall be located along an east-west line. Both wells shall be screened from the top of the water table to the elevation of the bottom of the test well screen and shall be completed as four inch diameter wells. The two observation wells and the test well shall be approximately in a line. Sparton shall develop each observation well to insure that the wells exhibit a rapid response to changes in the water level of the aquifer. The method of development shall not alter the groundwater geochemistry and shall be the surge pumping method or equivalent.

C. Pump Test

Sparton shall conduct a pump test which will consist of (1) a step drawdown test, (2) a constant rate test, and (3) a containment feasibility test. The pump test shall be designed to gather data for the following purposes:

- To evaluate the sustainable pumping rates in the test well;
- To evaluate the hydraulic parameters of the aquifer in the area of the leading edge of the contaminant plume including the coefficient of transmissivity (T), coefficient of storage (S), and saturated hydraulic conductivity (K); and
- To help evaluate the effectiveness of a containment system which uses the test well as the sole extraction well.

Water pumped during the pump test shall be discharged to the City of Albuquerque sanitary sewer system for a period of up to sixty days or such longer period as may be specifically authorized in writing by the City of Albuquerque Industrial Waste Engineer.

1. Preparatory Activities and Data Collection

For the three days preceding the pump test, Sparton shall manually measure the water level in all monitoring wells located along or west of Eagle Ranch Road twice daily. Sparton

**Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility**

shall place pressure transducers in the test well and the two observation wells, and Sparton shall record the water levels in those three wells for two days preceding the step drawdown test. During this two day period, Sparton shall record water levels in the test well and the two observation wells once per hour. This water level data shall be used to determine if corrections in water level measurements due to barometric pressure are required. All transducer measurements will be recorded in a Hermit 2000 data logger or the equivalent and the pressure transducers used shall be the In Situ PXD 261 or the equivalent.

Sparton shall use the data logger to record changes in water levels at the three wells equipped with pressure transducers at the intervals specified in this paragraph. These intervals shall be used for each step drawdown rate; the recovery period after the pumping portion of the step drawdown test; the constant rate test; the recovery period for the constant rate test; and the containment feasibility test. The measurement intervals shall be as follows:

<u>Elapsed Time (from start of measurement)</u>	<u>Measurement Interval</u>
0-5 seconds	0.5 seconds
5-20 seconds	1 second
20-120 seconds	5 seconds
2-10 minutes	0.5 minutes
10-100 minutes	2 minutes
100-1000 minutes	10 minutes
1,000-10,000 minutes	100 minutes
> 10,000 minutes	500 minutes

For the containment feasibility test, data logger readings may be discontinued after water level changes in the observed wells remain less than 0.1 feet (corrected for barometric pressure changes) for two consecutive days.

Sparton shall save the data from the data logger from each test on a computer disk. Sparton shall provide to the Plaintiffs copies of the computer disk containing these data and copies of all manual measurements associated with pump test activities.

Sparton shall conduct the step drawdown and constant rate pump test using a pump with a capacity of 60 horsepower. Prior to the actual pump tests, the pump discharge rate will be calibrated using a totalizer.

During the pump test, Sparton shall discharge water from the test well to the City of Albuquerque sanitary sewer system. The water shall be discharged to a convenient New Mexico Utilities sanitary sewer line via a double walled pipeline installed underground. Sparton shall consult with (1) Bob Gay New Mexico Utilities, 4700 Irving Boulevard, N.W.,

Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility

Albuquerque, NM 87114, (505) 898-2661 and (2) Stuart Reeder, Industrial Waste Engineer, Wastewater Utilities Division, Public Works Department, City of Albuquerque, 4201 2nd Street, S.W., Albuquerque, New Mexico 87105, (505) 873-6200, regarding the method for connecting with the sanitary sewer line prior to installing the connection. Sparton shall be responsible for complying with all relevant requirements regarding sanitary sewer line connections.

2. Step Drawdown Test

Sparton shall conduct a step drawdown test. The purpose of the step drawdown test is to determine the appropriate pumping rate for the constant rate test. The step drawdown test is expected to take one to two days. There shall be three discharge rates for the step drawdown test. The rates shall be determined by first operating the pump in the test well for a short period of time in order to determine the maximum output of the pump. The three rates shall then be approximately one-third of the maximum rate, two thirds of the maximum rate, and the maximum rate.

Sparton shall perform the step drawdown test by pumping the test well at the specified rates for at least one hour per step drawdown rate. Sparton shall conduct the step drawdown test sequentially without recovery intervals between steps. While pumping, water levels in the test well and the two observation wells shall be measured at the intervals set forth in Section II(C)(1). In addition, the totalizer reading for the test well pump shall be read at the following intervals during each step drawdown rate: one reading within the first five minutes after the test begins and additional readings approximately every 15 minutes thereafter until completion of the testing at that rate. Upon completion of the pumping phase of the step drawdown test, the test well shall be allowed to recover. Water levels in the test well and the two observation wells shall be measured at the intervals set forth in Section II(C)(1) until the test well has recovered. The step drawdown test shall be conducted in a manner consistent with standard industry practice as set forth in *Fletcher G. Driscoll, Groundwater and Wells, 2d. ed., 555-559 (1986)*.

Sparton shall provide all data collected during the step drawdown test, including disk copies of data from the data logger, copies of manual well measurement records, and records of totalizer readings, to Plaintiffs within twenty-four hours after completion of the step drawdown test. The purpose of providing these data is to allow Plaintiffs to analyze the data and reach conclusions regarding the constant rate pump test rate in a timely fashion.

3. Constant Rate Test

Sparton shall conduct a two to three day constant rate pump test. The constant rate test shall be designed to gather information to be used to determine the coefficient of transmissivity (T), storativity (S), and saturated hydraulic conductivity (K) of the aquifer in the area of the test well. Sparton shall commence the constant rate pump test no more than three days after a pumping rate for the constant rate test is agreed to by all parties. Sparton shall not commence the constant rate test until the test well has fully recovered from the step drawdown test. Sparton shall conduct the constant rate test by operating the test well pump at the highest sustainable pumping rate identified in the step drawdown test. At least twenty-four hours prior to the constant rate pump test, Sparton shall notify Plaintiffs of the rate which it has selected for the constant rate test and shall provide copies of the data on which it bases its selection. Within twenty-four hours of receiving this notification, Plaintiffs shall inform Sparton whether they agree with Sparton's selected rate. If Plaintiffs agree, the test shall be conducted at the agreed rate. If Plaintiffs disagree, Plaintiffs shall specify the rate which they have concluded is the appropriate pumping rate for the constant rate pump test. If Sparton agrees with Plaintiffs proposed pumping rate, the test shall be conducted at the agreed rate. If Sparton disagrees with Plaintiffs proposed pumping rate, the parties shall attempt to resolve the matter by discussion or possible mediation as soon as feasible.

During the constant rate test, Sparton shall use a data logger to record changes in the water level in the pumping well, and the two observation wells. Sparton shall also manually measure the water level in wells potentially affected by the test well. The wells to be measured manually during the pump test shall include MW 52, MW 65, MW 53, MW 68, MW 69, and any additional wells which Sparton deems appropriate. Manual measurements shall be conducted every four hours.

During the constant rate test, Sparton shall record the totalizer reading for the test well pump at the following points: 5 minutes after the test begins, 15 minutes after the test begins, 1 hour after the test begins, 3 hours after the test begins, and approximately every 3 hours thereafter until the conclusion of the test.

Sparton shall operate the test well pump at the selected rate and shall measure the water levels in the various wells as described above for a period of at least two days. Sparton may terminate the test after two days if equilibrium conditions have been achieved. If equilibrium conditions have not been achieved, Sparton shall continue to operate the test well pump at the selected rate and shall continue to measure the water levels in the various wells as described above for a third day. Sparton may terminate the constant rate test after three days even if equilibrium conditions have not been achieved.

Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility

Water level measurements during the recovery portion of the constant rate test shall continue until either (1) the manual and transducer measured wells recover to pre-constant rate test levels or (2) near the end of the expected recovery phase, water levels do not measurably recover for two days or more. During well recovery, water levels in transducer measured wells shall be recorded as described in Section II(C)(1) above.

4. Containment Feasibility Test

After the test well has fully recovered from the constant rate test, Sparton shall conduct a thirty day containment feasibility test using the test well and the monitoring network described in Table 1. The purposes of the containment feasibility test shall be (1) to determine the feasibility of a single extraction well containment system and (2) to determine aquifer characteristics over a large volume of aquifer. During the containment feasibility test, the test well shall be pumped at a constant rate for thirty days. Consistent with standard industry practice, Sparton shall analyze the data from the previous phases of the pump test and calculate the minimum rate at which the test well will need to be pumped in order to prevent further migration of the contaminant plume. Sparton shall use at least that minimum pumping rate for the containment feasibility test.

During the containment feasibility test, Sparton shall record the totalizer reading for the test well pump at the following points: 5 minutes after the test begins, 15 minutes after the test begins, 1 hour after the test begins, 3 hours after the test begins, and approximately every 3 hours thereafter until the conclusion of the test.

In addition to recording the transducer measurements as described in Section II(C)(1) above, during the containment feasibility study Sparton shall manually measure and record the water level in monitoring wells listed in Table 1 which are 750 feet or less from the test well at the following intervals:

- On days one through three of the containment feasibility test--approximately every 6 hours;
- On days four through seven of the containment feasibility test--once per day; and
- On days eight through thirty of the containment feasibility test--once per week.

**Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility**

Also during the containment feasibility study, Sparton shall manually measure and record the water level in monitoring wells listed in Table 1 which are more than 750 feet from the test well at the following intervals:

- On days one through seven of the containment feasibility test--once per day; and
- On days eight through thirty of the containment feasibility test--once per week.

D. Collection and Analysis of Samples

Sparton shall collect groundwater samples from MW 71 and the pump test observation wells after well development is completed. The following analytical methods shall be used: Method 8260 for volatile organics; Method 7196 for hexavalent chromium; Method 6010 total metals; Method 160.1 for total dissolved solids; Method 310.1 for alkalinity; and Methods 130.1 and 130.2 for hardness.

Sparton shall also collect a groundwater sample from the test well at the following times: (1) after well development is completed; (2) prior to the step drawdown test, (3) at the end of the step drawdown test; (4) on the first day of the containment feasibility test; (5) at least once per week during the containment feasibility test; (6) at the end of the recovery period following the containment feasibility test. The test well samples shall be analyzed for Method 8260 for volatile organics; Method 7196 for hexavalent chromium; Method 6010 total metals; Method 160.1 for total dissolved solids; Method 310.1 for alkalinity; and Methods 130.1 and 130.2 for hardness.

The provisions of this paragraphs shall apply to all samples collected pursuant to this Work Plan. Holding times for samples analyzed for volatile organics shall not exceed 7 days and holding times for samples to be analyzed for hexavalent chromium shall not exceed twenty-four hours. Sparton shall give Plaintiffs at least three days notice of all planned sampling events and shall make provisions for Plaintiffs to obtain splits of all samples collected. Sparton shall utilize EPA approved chain of custody procedures throughout the sample collection and handling process.

E. Analysis of Data Collected During Pump Test

Sparton shall analyze the data collected during the pump test using standard interpretive techniques in order to calculate values for transmissivity (T), storativity (S), and saturated hydraulic conductivity (K). Sparton shall prepare a report within 30 days of completion of the

**Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility**

pump test which contains the all data collected pursuant to this Work Plan including, but not limited to, water quality data, drilling logs, analyses of drilling cuttings, data plots, and interpretations used to calculate representative T, S, and K values. Sparton shall provide a disk copy of data from the data logger, but need not provide paper printouts of those data. Sparton shall include copies of all lab reports and chain of custody forms related to work done under this Work Plan in its report. Sparton shall also include in the report surveyed coordinates for the additional wells installed pursuant to this Work Plan. Sparton shall utilize EPA approved chain of custody procedures throughout the sample collection and handling process.

III. MODIFICATION OF THIS WORK PLAN

This Work Plan may be modified by agreement of all parties to the civil actions consolidated as City of Albuquerque v. Sparton Technology, Inc., No. CIV 97 0206 (D.N.M., filed February 19, 1997).

IV. PARTY REPRESENTATIVES

In each instance where this Work Plan requires notification, provision of data or reports, or any other communication, communication with party representatives listed below shall be adequate to comply with the requirement. Where notice is required within twenty-four hours, a party shall contact the listed representative(s) directly and, if unsuccessful, may instead contact counsel of record. By separate letter, each party shall provide notice of means to contact its representative on relevant evenings and weekends.

A party may change its representative either (1) by written notice sent by overnight mail to the representative of all other parties at least forty-eight hours in advance or (2) by hand delivering written notice to the designated representatives of other parties. In the case of written notice sent by overnight mail, the change in representative shall be effective forty-eight hours after mailing. In the case of hand delivery, the change in representative shall be effective upon delivery with respect to the party to whom notification is hand delivered. Written notice shall clearly state the name, title, complete business address including street address and any Post Office Box number, business telephone number and business facsimile number of the new representative. If appropriate, written notice shall also state the means by which the new representative may be contacted on relevant evenings and weekends.

Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility

United States of America and the Environmental Protection Agency:

Michael Hebert
Hydrologist
Enforcement Division (6EN-HX)
United States Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
Telephone: (214) 665-8315
Facsimile: (214) 665-7446

State of New Mexico, New Mexico Office of the Natural Resources Trustee, and the New Mexico Environment Department, the Bernalillo County Commissioners, and the City of Albuquerque:

Dennis McQuillan
Assessment and Abatement Section
New Mexico Environment Department
Post Office Box 26110
[1190 St. Francis Drive (87503)]
Santa Fe, New Mexico 87502-6110
Telephone: (505) 827-2831
Facsimile: (505) 827-2965

Sparton Technology, Inc.:

James B. Harris
Thompson & Knight, P.C.
1700 Pacific Avenue, Suite 3300
Dallas, Texas 76201-4693
Telephone: (214) 969-1102
Facsimile: (214) 969-1761

**Work Plan For Installation Of Additional Wells And Conducting A Pump Test In The Area Of The Leading Edge
Of The Contaminant Plume Originating From The Sparton Technology, Inc. Coors Road Facility**

Table 1			
Summary of Groundwater Monitoring Wells Within 2000 Feet of Proposed Pump test/containment well Location			
Monitor Well	Approx. Radial Distance ft.	Gradient Position	Cluster Well
MW 37	1,850	Up	Yes
MW 45	1,850	Up	Yes
MW 46	1,550	Up	No
MW 47	1,300	Up	No
MW 48	950	Up	Yes
MW 52	600	Cross	Yes
MW 53	550	Up	No
MW 54	1,400	Up	Yes
MW 55	950	Up	Yes
MW 56	950	Up	Yes
MW 57	1,400	Up	Yes
MW 58	700	Up	No
MW 60	900	Up	Yes
MW 61	900	Up	Yes
MW 62	1,600	Up	No
MW 64	1,400	Up	Yes
MW 65	600	Cross	Yes
MW 66	1,400	Up	Yes
MW 67	950	Up	Yes
MW 68	450	Cross	Yes
MW 69	450	Cross	Yes
MW 71	700	Up	Yes w/60 & 61
PZ-2	75±	Down	No
PZ-3	200±	Down	No