



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
525 Camino De Los Marquez  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-4358  
Fax (505) 827-4389

96 AR  
#26  
MARK E. WEIDLER  
SECRETARY  
EDGAR T. THORNTON, III  
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 12, 1995

Mr. Larry Gandy  
Vice President  
Gandy Marley, Inc.  
1109 East Broadway  
Tatum, New Mexico 88267

**RE: Additional Drill Holes Proposed for the Triassic Park  
Hazardous Waste Disposal Facility**

Dear Mr. Gandy:

The New Mexico Environment Department (NMED) has reviewed the June 26, 1995 proposal from Mr. James Bonner of the S.M. Stoller Corporation for three additional drill holes at the Triassic Park Hazardous Waste Disposal Facility. A copy of his letter is attached. NMED understands the purposes of the drill holes are:

- 1) to locate the Upper Dockum/Lower Dockum contact in the eastern part of the proposed facility, as well as immediately east of the facility boundary,
- 2) to identify groundwater zones, and
- 3) to collect permeability data on the Lower Dockum unit.

NMED approves the drilling program with the following conditions:

- 1) the proposed drill holes be located as indicated on the attached map, and
- 2) each hole must be drilled deep enough to be certain it has gone through the Upper Dockum/Lower Dockum contact.

Positioning the proposed drill holes as shown on the attached map will provide important Upper Dockum/Lower Dockum contact information. The attached map also indicates which of the previous drill holes penetrated the contact, which did not, and which are questionable. Note that the ten easternmost holes (including those located on the east slope of the proposed landfill, i.e. PB-22 and PB-30-C) failed to reach the Lower Dockum. Locating drill hole (A) as shown on the map will provide

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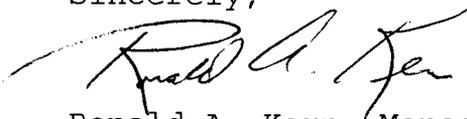
valuable information under the landfill's slope; drill hole (B) will supply data near the facility boundary; and drill hole (C) will answer questions about groundwater in the Upper Dockum immediately east of the proposed facility.

Drilling each hole deep enough to be certain the Lower Dockum is penetrated is one of the stated purposes of the program. In comparing the geophysical logs to the lithology logs for the holes drilled in July 1994, it became obvious that the Lower Dockum had not been reached in all drill holes (see attached map). For the proposed 3-hole drilling program it must be clear, on the lithology logs and on the geophysical logs, that the Upper Dockum/Lower Dockum contact has been penetrated.

If groundwater is encountered, regulatorily adequate monitoring wells most likely will be required. Should Gandy Marley, Inc. choose to complete any of the three proposed drill holes as monitoring wells, NMED should be informed beforehand to ensure technical regulatory adequacy. Monitoring wells should be designed, completed, and developed in accordance with the U.S. Environmental Protection Agency's (EPA) guidelines. NMED, if requested, will provide a copy of the relevant pages of EPA's RCRA GROUND-WATER MONITORING: DRAFT TECHNICAL GUIDANCE, November 1992

NMED appreciates your cooperation in this venture. If you have questions please call Bob Sweeney of my staff at (505) 827-4308. Additionally, please contact Mr. Sweeney as soon as you have a firm drilling schedule so he may make plans to visit the facility for observing the drilling operations.

Sincerely,



Ronald A. Kern, Manager  
RCRA Technical Compliance Program  
Hazardous and Radioactive Materials Bureau

attachments:

June 26, 1995 letter from S.M. Stoller Corp.  
Map showing July 1994 drill holes and approved locations  
for proposed drilling

cc with attachments:

James A. Bonner, S.M. Stoller Corporation  
TPDF 1995 Red File

cc without attachments:

Barbara Hoditschek, Manager, RCRA Permitting Program  
Cornelius Amindyas, RCRA Permitting Program  
RCRA TCP TPDF File