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November 9, 2016

To: Ricardo Maestas
New Mexico Environment Department
2905 Rodeo Park Drive, Building 1
Santa Fe, NM 87505
Ricard.maestas@state.nm.us



Dear Mr. Maestas:

On behalf of the Carlsbad Mayor's Nuclear Task Force and that task force's regulatory subcommittee, we are writing in support of the proposed Class 3 Permit Modification Request (PMR) regarding the addition of a concrete overpack container storage unit.

We endorse this proposed permit modification and encourage the New Mexico Environment Department to approve the request, which was filed by the Department of Energy and its contractor. We do not have any technical concerns related to this PMR.

We understand that this Class 3 modification, if approved, will allow WIPP to add a CH TRU mixed waste container storage unit of 65,280 square feet above ground. This represents a substantial increase in the facility's storage container capacity and will create the ability to store up to 408 concrete overpacks with contact-handled TRU mixed waste.

The addition of a concrete overpack container storage unit above ground at WIPP will improve efficiencies related to the process of shipping waste to WIPP and the process of disposing waste in the WIPP underground. This change will allow WIPP to continue processing waste when inclement weather delays shipment to WIPP, for example, or allow WIPP to continue receiving waste when there is a maintenance outage in the underground. It does not represent an expansion of WIPP's mission so much as it is, simply, a reasonable improvement to the current process.

We appreciate the opportunity to participate in the "pre-scoping" process that took place as part of this PMR submittal, as well as the official public meeting. We especially appreciate the addition of additional language clarifying the Job Hazards Analysis process at WIPP and noting



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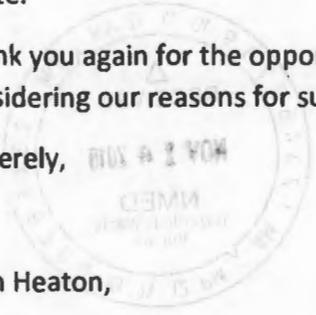


that procedure training will be provided to the TRU mixed waste handlers who will handle this waste.

Thank you again for the opportunity to comment on this proposed modification, and for considering our reasons for support.

Sincerely,

John Heaton,



Carlsbad Mayor's Nuclear Task Force Chair

Dave Sepich,

Carlsbad Mayor's Nuclear Task Force – Regulatory Subcommittee