



February 27, 2018

To: Mr. John E. Kieling
Hazardous Waste Bureau, New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1,
Santa Fe, New Mexico 87505-6303
Butch.tongate@state.nm.us, John.kieling@state.nm.us



Dear Mr. Kieling:

This letter is being submitted on behalf of the Carlsbad Mayor's Nuclear Task Force regarding the Dec. 22, 2017, request for a determination of a Class for a Permit Modification Request (PMR) filed by the Department of Energy and Nuclear Waste Partnership. This request is related to a PMR for the Waste Isolation Pilot Plant (WIPP) titled "Excavation of a New Shaft and Associated Connecting Drifts."

Members of the Carlsbad Mayor's Nuclear Task Force have reviewed this request and believe the Excavation of a New Shaft to clearly be a Class 2 permit modification. Furthermore, we believe prompt resolution of this determination, as well as the PMR itself, to be important to the mission of the WIPP facility.

The proposed new shaft will provide an unfiltered ventilation path to facilitate full-scale mining and maintenance operations. Because a risk for contamination from the WIPP underground remains, it is currently necessary to filter air that is vented through the Exhaust Shaft. The quantity of air is limited by the filtration equipment. The new shaft provides another ventilation circuit for mining that does not use the Exhaust Shaft and does not need to be filtered. This upgrade provides important mining and related maintenance efficiencies.

Regarding the new shaft proposal, we ask that you also consider the following:

- This permit modification is not technically complicated. The introduction of Shaft #5 and its connecting drifts will increase airflow to the underground. The shaft will enhance workforce safety and not diminish protection to workers or the public in any way.
- This is a mining issue, and members of the Carlsbad community understand mining very well. Due to the presence of the potash industry, members of the host community are very well versed in basic mining concepts and processes.
- Opposition to this shaft is based on the argument that it may be used for expansion. Expansion would require its own permit modification for each disposal unit, so such a debate is not germane to this request which is for the present mining, safety and disposal needs.
- The WIPP facility will continue to be operated in its present footprint for some 6 to 8 years more, and this shaft is absolutely necessary to minimize risk by facilitating an upgrade to the ventilation system.
- The WIPP facility presently has 4 shafts, of which one is contaminated. The original function of this shaft to provide unfiltered ventilation air to support mining needs to be replaced with this newly proposed shaft and reconfiguration of shaft utilization. A shaft is nothing new for WIPP, it is not complicated or technically challenging by any stretch of the imagination.

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In closing, a new shaft will be used in the present footprint for a number of years, and it will allow the WIPP facility operator to provide a clean air environment with full ventilation in support of mining and underground maintenance. It is easy to lose sight of the fact that the WIPP repository is a mine, and as a mine, adequate ventilation is the single most important factor in protecting workers. Adequate air flow sustains the well-being of the workforce by providing the necessary air flow, and it allows enough equipment and workers to roof bolt the back and ribs at full capacity, as well as provides the simultaneous use of other mining and transport equipment necessary to for full scale operations. A new shaft is just that, nothing new or complicated for the WIPP facility. It is important for providing for the health and safety of our workers. It seems as though a decision for a Class II permit modification for the shaft is clearly in the interest of worker safety and the quicker it can be initiated, the more quickly simultaneous underground activities can be performed without increasing the risk to workers. We, as a community and our WIPP workers, have endured a tremendous amount in the last four years. A Class II determination is called for to support safe operations as quickly as possible.

Thank you for your consideration.

Best regards,

A handwritten signature in cursive script, appearing to read "John Heaton". The signature is written in black ink and is positioned above the typed name.

John Heaton, Chair Mayor's Nuclear Task Force