

**From:** [Maestas, Ricardo, NMENV](mailto:Ricardo.Maestas@state.nm.us)  
**To:** [Biswell, David, NMENV](mailto:David.Biswell@state.nm.us); [Tellez, Hernesto, NMENV](mailto:Hernesto.Tellez@state.nm.us); [McLean, Megan, NMENV](mailto:Megan.McLean@state.nm.us)  
**Subject:** FW: WIPP proposal  
**Date:** Monday, March 19, 2018 8:40:05 AM

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**From:** Andrew Gold [<mailto:rosemount@cybermesa.com>]  
**Sent:** Friday, March 16, 2018 3:38 PM  
**To:** Maestas, Ricardo, NMENV <[Ricardo.Maestas@state.nm.us](mailto:Ricardo.Maestas@state.nm.us)>  
**Subject:** WIPP proposal

\_\_March 16, 2018

By email to: [ricardo.maestas@state.nm.us](mailto:ricardo.maestas@state.nm.us)

Mr. Ricardo Maestas  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive E, Building 1  
Santa Fe, New Mexico 87505

Dear Mr. Maestas:

I am very concerned about the proposed expansion of the amount of waste in the Waste Isolation Pilot Plant – a proposed 28% increase – all by changing the way waste is measured.

The proposed increase of 930,000 cubic feet requires the New Mexico Environment Department to deny the request and require the Department of Energy and its contractor, Nuclear Waste Partnership, to resubmit their request as a Class 3 permit modification request. This is a significant volumetric change requiring more scrutiny by the public and the Environment Department. Alternatively, the Environment Department must determine that the request will follow Class 3 permit modification request procedures.

Over its 19 years of operations, DOE has shipped many empty (dunnage) drums, has not filled containers to capacity, yet the contractors have been paid fully – and in some cases with bonuses. To allow the proposed change, risks the health and environment for all New Mexicans.

Thank you for your careful consideration of my comments. Please use your regulatory power to deny the request or require the Class 3 permit modification request procedures, which include an opportunity for a public hearing as well as the opportunity to cross-examine sworn witnesses.

Sincerely,  
Andrew Gold  
PO Box 355; Las Vegas, NM 87701

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