



CARLSBAD NEW MEXICO
department of development

October 8, 2019

To: Ricardo Maestas
New Mexico Environment Department
Ricardo.Maestas@state.nm.us

Dear Mr. Maestas:

As President of the Carlsbad Department of Development, I am writing to ask you to approve the Permit Modification Request to construct a new shaft for WIPP. The Carlsbad Department of Development (CDOD) is a private non-profit agency with a membership consisting of almost 100 chief executive officers in industry, business and finance, the City of Carlsbad, Eddy County Board of Commissioners, New Mexico State University-Carlsbad, and others, all with a mutual goal of promoting the economic and general welfare of the citizens of the City of Carlsbad and Eddy County.

We believe that the proposed new shaft project is necessary to the environmental health of New Mexico and the nation. The WIPP operation is a highly successful project that is meeting the goal of permanently disposing of defense-generated transuranic (TRU) waste from both contaminated closed facilities and currently operating sites across the nation, including Los Alamos National Laboratory, which is, of course, just upwind of Santa Fe.

The new shaft also provides access to excavation of additional panels in WIPP's underground in the future. Though future use of the shaft for future panels would have to also go through the additional permitting required by the permit for that expansion. WIPP will require additional panel space in the future in order to continue meeting this goal.

If this request is approved, the improvement to the mine would allow mining, maintenance and waste emplacement operations to all safely take place at the same time. These processes must be at different times now due to limited air flow. This proposed modification will increase ventilation airflow into the underground and create an unfiltered exhaust path through the existing Air Intake Shaft to allow the dust from mining to escape without compromising the HEPA filter system. Thus, adding the new shaft now will greatly enhance the air flow in the mine, and combined with the new Permanent Ventilation System under construction, will restore WIPP's underground operation to its pre-2014 condition and allow the emplacement rate to increase, thus allowing the cleanup of LANL waste to happen at a quicker rate.

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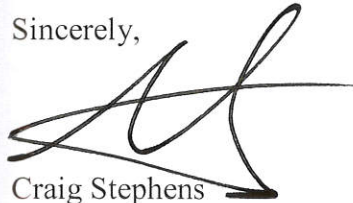
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Finally, and most importantly, we believe that the project is necessary to ensure the safety of the workforce by reducing worker exposure to diesel fumes in the mine. A delay of the shaft now puts workers at unneeded risk and very simply adds to the cost of recovery when the shaft most assuredly must occur to fulfill WIPP's mission. A delay of the shaft now puts workers at unneeded risk and very simply adds to the cost of recovery when the shaft most assuredly must occur to fulfill WIPP's mission.

It is our hope that after considering the abovementioned points of fact regarding the Class 3 Permit Modification request, the NMED will grant prompt approval of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'CS', with a long horizontal stroke extending to the right.

Craig Stephens
President, Board of Directors,
Carlsbad Department of Development