Sent from my Sprint Samsung Galaxy S7.

-------- Original message --------
From: Steve Zappe <steve_zappe@mac.com>
Date: 12/25/19 11:26 PM (GMT-07:00)
To: "Maestas, Ricardo, NMENV" <Ricardo.Maestas@state.nm.us>
Cc: Don Hancock <scridon@earthlink.net>, Scott Kovac <scott@nukewatch.org>, Joni Arends <jarends@nuclearactive.org>, "Cobraim, Dave, NMENV"
      <dave.cobraim@state.nm.us>
Subject: [EXT] Comment on Oct 25, 2019 WIPP Class 2 PMR (Removal of Deteriorating/Non-Essential Water Level Monitoring Program Wells)

Hi, Ricardo -

I procrastinated writing this comment to the last minute and need to submit it before leaving on vacation December 26. This comment is concerning the Class 2 Permit Modification Request (PMR) entitled "Removal of Deteriorating/Non-Essential Water Level Monitoring Program Wells", which was submitted to NMED on October 25, 2019. Please consider this a written comment submitted in a timely manner on this PMR.

The Permittees are proposing to remove Figure L-5, "Culebra Freshwater-Head Potentiometric Surface." The Permittees state on page 9 of the PMR, "This figure is proposed for removal from the Permit since this figure is obsolete and is updated in the Annual Culebra Groundwater Report, which is provided to the NMED in accordance with Permit Part 5, Section 5.10.2.1, Data Evaluation Results."

The fact that this figure is submitted annually to NMED does not render it "obsolete" with respect to the permit, nor does removing the reference to it in Permit Attachment L, Section L-1a(2)(iii), The Rustler, make the text in that section any clearer. The potentiometric surface changes almost negligibly from year to year, and if "a picture is worth a thousand words," a map to accompany the description in Section L-1a(2)(iii) is worth much more than the couple of lines devoted to it. Seriously, does the text statement, "The hydraulic gradient within the Culebra in the area of the WIPP facility is approximately 20 ft per mi (3.8 m per km) and becomes much flatter south and southwest of the site" make much sense without the figure?

My comment specifically is that this figure should not be removed, nor should any references to it be removed. Instead, the Permittees should simply update it with the most recent public version of the map and provide the map date, as the current Figure L-5 does. Retaining a map of the Culebra freshwater head potentiometric surface makes it easier for NMED and the public to understand the likely transport path of any potential future release from the
Removing it from the permit and forcing the public to search for another document is unwarranted and should be denied.

Thanks for considering my comment.

Steve Zappe
Santa Fe, NM