



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 October 16, 2020

Mr. Kevin Pierard, Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Building 1
 Santa Fe, New Mexico 87505

Subject: Response to Information Request Regarding Schedule and Work Stoppages for the Excavation of Shaft #5

Dear Mr. Pierard:

The purpose of this letter is to respond to the information request made by the New Mexico Environment Department (NMED) during their September 29, 2020 inspection of the Shaft #5 (S#5) excavation activities. The information requested was with regard to the excavation schedule and for the Permittees' contingency plan to address certain work stoppage scenarios.

The work scheduled to be performed and the expected time frames are listed below in Table 1. Note that as of September 29, 2020, the excavation was completed to 116 feet (ft) below ground surface (bgs). Shaft excavation is anticipated to resume in mid-December 2020 as shown in Table 1.

Table 1: Short Term Schedule for S#5 Excavation

Work	Key Dates	Description/Status
S#5 Concrete Liner/Plenum/Duct Installation	Oct. 5 – Nov. 14, 2020	Single deck Galloway installed in the shaft (work completed Oct. 5, 2020). Continue concrete liner/plenum/duct installation. The concrete liner will be installed from the 116-foot level to the collar.
Galloway/Hoist/Winches	Nov. 20 – Dec. 7, 2020	Install multi-deck Galloway; install hoist ropes and pulley system; test and commission hoist, winches, and Galloway.
Install Headframe	Nov. 20 – Dec. 10, 2020	Complete the installation of the headframe over S#5.
Resume Shaft Excavation (Sinking)	Dec. 18, 2020	Resume shaft excavation using multi-deck Galloway.
Excavation	Apr. 22, 2021	Shaft excavation is predicted to be at 850 ft bgs.

The Permittees have prepared this contingency plan to implement in the event excavation work on S#5 is unable to proceed. The goals of this contingency plan are as follows:

- Develop subcontracting directions based on NMED decision letter
- Stop shaft excavation activity
- Place the shaft in a safe configuration to accomplish the following goals:
 - Protect workers during shutdown and restart
 - Protect the asset and infrastructure
 - Allow ongoing inspection and maintenance of critical infrastructure per subcontracting review
- Facilitates restart when/if authorization is provided.

This letter serves as notification that the Permittees will implement this contingency plan under one of the following scenarios, if appropriate:

Scenario 1: No reissuance of the current Temporary Authorization (excavation is currently at 116 ft bgs).

After October 24, 2020, shaft excavation will not be resumed until additional authorization from NMED has been received. Liner/plenum/ductwork construction will be completed since interrupting this work will create an unsafe condition (i.e., plenum not adequately supported by the liner can pose a threat to workers in and around the shaft project and can result in damage to the shaft and plenum). This work will be completed around mid-November 2020.

Following installation of surface equipment, such as winches and hoist motors, they will be covered to protect them from the elements. Planning to support routine inspections and maintenance of this equipment, and any additional work not directly related to shaft excavation will be performed while the work stoppage is in effect. Administrative work will be required to initiate a change to the existing subcontract(s) to ensure that the personnel required, and the scope are adequately defined.

The shaft will be covered upon completion of the liner/plenum/ductwork. However, inspections will continue, and removal of any accumulated water will be performed as needed.

Scenario 2: Temporary Authorization is reissued for an additional 180 days beginning October 25, 2020; however, the Class 3 permit modification administrative procedure has not been completed by April 22, 2021.

On or before April 22, 2021, excavation activity will cease. Excavation is expected to be at about 850 ft bgs. Mapping of the shaft to depth will be completed.

Stabilization of the walls, including liner installation and any treatment of water bearing zones, will proceed to completion in order to protect the excavation and to avoid potential cross contamination of groundwater. The Galloway will be placed in a safe condition. Installed equipment, such as winches and hoist motors, will be covered to protect them from the elements. Routine inspection and maintenance of this equipment and any additional equipment identified by the Project Manager will be planned and performed.

Administrative work will be required to initiate a change to the existing subcontract(s) to ensure that the personnel required, and the scope are adequately defined. The shaft will be covered. However, inspection will continue, and removal of any accumulated water will be performed as needed. Lowering and raising the Galloway may be needed to perform inspections.

Under either scenario, the Permittees will proceed with scheduled surface activities unrelated to the excavation (e.g., infrastructure installation, grading, paving, utility installation).

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have questions, please contact Mr. Michael R. Brown at (575) 706-0072.

Sincerely,

Reinhard M. Knerr
Reinhard Knerr
Manager
Carlsbad Field Office

Digitally signed by Reinhard M. Knerr
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MARK PEARCY (Affiliate)
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