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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 7, 2019

Doug Hintze, Manager
Environmental Management
Los Alamos Field Office
P.O. Box 1663 MS-M984
Los Alamos, NM 87545

**RE: NOTICE OF DISAPPROVAL
WORK PLANS FOR THE PLUGGING AND ABANDONMENT OF
WELLS AND BOREHOLES FOR FISCAL YEAR 2019
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-18-064**

Dear Mr. Hintze:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE's) document entitled *Work Plans for the Plugging and Abandonment of Wells and Boreholes for Fiscal Year 2019* (Work Plan), dated November, 2018 and referenced by EM2018-0049. After NMED's review of the Work Plan, draft comments were submitted to DOE by electronic mail on January 16, 2019. A follow-up electronic mail to discuss NMED's draft comments was sent to DOE on May 15, 2019. DOE has not responded to NMED's draft comments, and NMED hereby issues this Notice of Disapproval (NOD).

General Comments:

1. DOE must provide historical background information describing the original purpose of the wells and boreholes to be abandoned in Ancho, Pajarito, and Sandia Canyons. Please indicate if these wells and boreholes were installed to investigate a Solid Waste Management Unit (SWMU) or Area of Concern (AOC), and the current status of the SWMU or AOC.
2. For each well proposed for plugging and abandonment, the presence of groundwater must be determined prior to plugging and abandonment. DOE must indicate that this will be performed in the Work Plan.
3. The following wells (which are designated for plugging and abandonment in the Work Plan) must be retained for future monitoring, assuming they are currently functional or can be repaired: LAO-0.6, LAO-1.6g, LAO-6A, 18-MW-7 and 3MAO-2. DOE must remove these wells from the Work Plan.
4. DOE must indicate the anticipated start date of field work and anticipated delivery date of the field completion report for the plugging and abandonment activities.

Specific Comments:

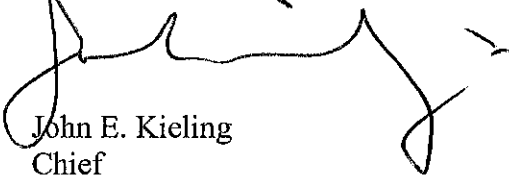
1. **Section 3.1, Work Plan to Plug and Abandon Alluvial Boreholes and Groundwater Observation Wells in Ancho Canyon, page 4:** DOE must indicate dates when historically dry wells were last monitored for the presence of groundwater.
2. **Section 3.5, Work Plan to Plug and Abandon Alluvial Groundwater Test Boreholes in Sandia Canyon, page 8:** For the wells in Sandia Canyon that surround SWMU 53-002 (a-b), DOE must indicate if groundwater has ever been detected. If groundwater was detected, DOE must indicate if contaminants were ever detected in groundwater. Additionally, DOE must indicate the current status of PRS 53-002 (a,b).

DOE must address all comments and submit a revised Work Plan within sixty (60) days of receipt of this letter. As part of the response letter that accompanies the revised Work Plan, DOE shall include a table that details where all revisions have been made to the Work Plan and that cross-references NMED's numbered comments. In addition, NMED requests that a redline-strikeout version (electronic and hard copy) of the Work Plan be submitted with the response to this NOD.

Mr. Hintze
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If you have any questions or comments regarding this correspondence, please contact Dane Andersen at 505-476-6056.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

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File: 2019 LANL, TA-00 NOD for the FY 2019 Plugging & Abandonment Work Plan