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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

September 4, 2019

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

**RE: REQUEST FOR ADDITIONAL INFORMATION
REQUEST FOR EXTENSION OF WESTBAY WELLS RECONFIGURATION COMPLETION
REPORT FISCAL YEAR 2019 MILESTONE # 14, APPENDIX B OF THE CONSENT ORDER
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-MISC**

Dear Mr. Hintze:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE's) *Request for Extension of Westbay Project Milestone* (Request), dated and received on August 26, 2019 and referenced by EM-LA-30AD-00493.

The Milestone #14 is "[W]estbay Wells Reconfiguration Completion Report for R-5, R-7, R-8, R-9i, R-19, R-25, and R-31" and is described as "[T]his report will include a summary of field activities and as-built information associated with reconfiguration of R-5, R-7, R-8, R-9i, R-19, R-25, and R-31, and plugging and abandonment of R-25 which requires removal of the Westbay system. The work will be conducted pursuant to NMED-approved work plans".

Mr. Hintze
September 4, 2019
Page 2

Section XXVIII of the Compliance Order on Consent (CO) allows for extensions for good cause upon receipt of a timely request. The DOE submitted the Request on August 26, 2019, four days prior to the due date.

In the Request, DOE cites Section XXVIII.C.6 of the CO, “[u]nanticipated breakage or accident to machinery, equipment, or lines of pipe” as a good cause for extension. DOE’s Request provides justification for delay in completion of R-5 and R-25 wells based on the difficulties encountered in the field. However, Milestone #14 included reconfiguration of total of seven wells, of which justification for two wells was provided. DOE must provide additional information on the reconfiguration of wells R-7, R-8, R-9i, R-19, and R-31 as no justification was provided in the Request.

NMED requires this additional information prior to considering DOE’s Request. DOE must submit the requested additional information by September 11, 2019 to enable NMED to respond to the Request in a timely manner. If you have any questions regarding this correspondence, please contact Neelam Dhawan at 505-476-6042.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

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File: 2019 LANL, Request for Additional Information, Extension Request for Reconfiguration of Westbay Wells, Milestone # 14, Appendix B, FY 2019