



DEPARTMENT OF ENERGY
Environmental Management Los Alamos Field Office (EM-LA)
Los Alamos, New Mexico 87544

SEP 11 2019



Mr. John E. Kieling
Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Response to Request for Additional Information Regarding Request for Extension of Westbay Wells Reconfiguration Completion Report Milestone

References:

1. Letter, J.E. Kieling to D. Hintze, "Request for Additional Information Request for Extension of Westbay Wells Reconfiguration Completion Report Fiscal Year 2019 Milestone #14, Appendix B of the Consent Order," dated September 4, 2019
2. Letter EM-LA-30AD-00493, A.Q. Duran to J.E. Kieling, "Request for Extension of Westbay Project Milestone," dated August 26, 2019

Dear Mr. Kieling:

On September 4, 2019, the New Mexico Environment Department (NMED) requested additional information (Reference 1) regarding the U.S. Department of Energy (DOE) Environmental Management Los Alamos Field Office (EM-LA) request for extension of Westbay Project Milestone (Reference 2) dated August 26, 2019. The table below provides a summary of the additional information requested.

Well Number	Field Start Date	Baski System Installation Completion Date	Remaining Work
R-9i	5/22/2019	8/11/2019	Well pad construction, data analysis, report preparation
R-7	5/18/2019	8/13/2019	Well pad construction, data analysis, report preparation
R-8	5/29/2019	8/30/2019	Well pad construction, data analysis, report preparation
R-19	5/31/2019	9/06/2019	Well pad construction, data analysis, report preparation
R-31	6/29/2019	10/31/2019*	A low flow condition was discovered on 8/24/19 at planned screen 2 for retention. Work associated with this discovery will involve (1) developing a recommendation for a viable sampling system for NMED consideration, (2) meeting with NMED concerning approval of a revised sampling system, (3) procuring the approved sampling system, (4) installing the revised sampling system, (5) completing well pad construction, and (6) finalizing data analysis and report preparation.

*Estimated completion date

While DOE in response to NMED's request for additional information has provided the information above, DOE's position is that Consent Order Section XXVIII – *Extensions*, is not intended to provide a mechanism for subdividing a milestone in order to partially approve/deny an extension request for an agreed-upon milestone. In other words, the request for an extension (Reference 2) is for the entirety of the milestone, as defined in Appendix B and agreed to by the parties, and not for an individual component(s) of the milestone.

If you have any questions, please contact Erich Evered at (505) 309-1360 (erich.evered@em-la.doe.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@em.doe.gov).

Sincerely,

For: 

Arturo Q. Duran
Compliance and Permitting Manager
Environmental Management
Los Alamos Field Office

cc (date-stamped letter emailed):

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R. Martinez, San Ildefonso Pueblo, NM
D. Chavarria, Santa Clara Pueblo, NM
S. Yanicak, NMED
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