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Rec'd 3/18/20

MAR 18 2020

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Arturo Q. Duran
Designated Agency Manager
DOE-Environmental Management
Los Alamos Field Office
P. O. Box 1663 MS-M984
Los Alamos, NM 87545

**RE: APPROVAL
REQUEST FOR EXTENSION OF FISCAL YEAR 2020 APPENDIX B MILESTONE #6, WESTBAY
WELL PLUGGING AND ABANDONMENT COMPLETION REPORT FOR R-25
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
LANL-19-062**

Dear Mr. Duran

The New Mexico Environment Department (“NMED”) has received the United States Department of Energy’s (“DOE”) document entitled *Status of Westbay Well R-25 Reconfiguration Efforts and Request for Extension of Fiscal Year 2020 Appendix B Milestone #6, Westbay Well Plugging and Abandonment Completion Report for R-25*, dated and received on February 24, 2020 and referenced by EMLA-2020-1275-02-001.

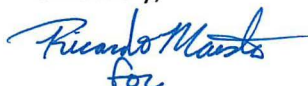
In accordance with the 2016 Compliance Order on Consent (Consent Order) Section XXVIII, Extensions, DOE is seeking an extension to the March 31, 2020, completion date for Consent Order fiscal year (FY) 2020 Appendix B Milestone #6, Westbay Well Plugging and Abandonment Completion Report for R-25. DOE has successfully reconfigured six of the seven Westbay wells over the past year. Regional well R-25 presented significant technical challenges and could not be completed. The technical difficulties encountered during plugging and abandonment of R-25 is provided as a good cause to justify extension request for the milestone in accordance with Consent Order Section XXXVIII.C(7).

DOE met with NMED staff on January 28, 2020 to discuss the technical difficulties encountered in the field and efforts being made by DOE to resolve the technical issues. DOE states that there is significant uncertainty regarding the time required to complete the plugging and abandonment of R-25. DOE anticipates that it will be completed in fiscal year 2021. Pursuant to Section XXVIII of the Consent Order this will no longer be considered a milestone for FY 2020.

DOE has provided adequate justification for the delay and NMED hereby grants an extension for FY2020 milestone #6 until FY 2021. Since DOE is not able to provide a completion date at this time, DOE must provide monthly status updates to NMED via email starting the week of March 23, 2020. In addition, DOE must provide formal quarterly status reports to NMED starting May 29, 2020. DOE must also provide a detailed list of all fluids that are to be used for enhanced lifting or circulation techniques.

If you have any questions regarding this correspondence, please contact Michael Jojola of my staff at (505) 476-6056.

Sincerely,



for
Kevin Pierard
Chief

Hazardous Waste Bureau
New Mexico Environment Department

Cc (letter emailed)

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