



November 1, 2021

Arturo Duran  
Designated Agency Manager  
Environmental Management  
U.S. Department of Energy  
Los Alamos Field Office  
1200 Trinity Drive, Suite 400  
Los Alamos, New Mexico 87544

**Re: DOE Response to Notice of Disapproval  
Completion Report for Regional Aquifer Well R-70, Revision 1  
Los Alamos National Laboratory  
EPA ID#NM0890010515  
HWB-LANL-19-080**

Dear Arturo Duran,

The New Mexico Environment Department (NMED) received the United States Department of Energy's (DOE) *Response to Notice of Disapproval, Completion Report for Regional Aquifer Well R-70, Revision 1, and the Response to the New Mexico Environment Department's Draft Comments on the Completion Report for Regional Aquifer Well R-70* (Letter) on July 23, 2021. The Notice of Disapproval (NOD) was issued by NMED on May 25, 2021, following review of DOE's *Completion Report for Regional Aquifer Well R-70, Revision 1* (Revision 1) dated November 2020 and referenced by EM2020-0564. Revision 1 was submitted based on an agreement reached during a technical meeting between NMED and DOE on September 8, 2020 (Meeting) to remove all content from the submittal that pertain to the aquifer test and to address other reporting issues including the well completion as-built diagrams. However, Revision 1 contained multiple references to the aquifer test and issues with the well completion diagram remained unresolved. In response, NMED issued the NOD in accordance with Paragraph F of Section XXIII of the Consent Order.

DOE's Letter states that a second revision will be submitted 60 days following resolution of outstanding comments, which primarily involve only the aquifer test issues. However, submittal of the revision does not require any aquifer test information based on our agreement made in the Meeting. The comments that pertain to other reporting issues including the well completion diagrams appear to be resolved and DOE must submit the second revision as stated in the NOD within 30 days of the date of this letter to receive NMED approval of the well completion report for R-70.

Regarding the aquifer tests conducted at monitoring well R-70, NMED and the U. S. Environment Protection Agency (EPA) have concluded that there are extensive issues regarding the validity of the data and the test

procedures that render the results unusable. NMED will schedule a separate meeting to discuss the appropriate standard aquifer test methods to use in future aquifer tests that will facilitate NMED approval.

DOE must satisfactorily resolve all the disapproval comments that pertain to other issues than the aquifer test and must not add to, delete from, or introduce other modifications to the revision that do not pertain to the comments issued with the NOD. If DOE notes other issues that may need modification, DOE must contact NMED to discuss the matter before making any modifications to the revision. As stated above, the revision is due within 30 days of the date of this correspondence.

Should you have any questions regarding this correspondence, please contact Christopher Krambis (505) 231-5423.

Sincerely,

Chris Catechis  
Digitally signed by Chris Catechis  
Date: 2021.11.01 15:33:06 -06'00'

Chris Catechis  
Acting Division Director  
Resource Protection Division

cc:

N. Dhawan, NMED HWB  
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File: LANL 2021 and Reading, Completion Report for Regional Aquifer Well R-70  
HWB-LANL-19-080