JAMES C. KENNEY

CABINET SECRETARY

Sent Via Certified Mail

January 10, 2022

M. Lee Bishop, Director
United States Department of Energy
Environmental Management Los Alamos Field Office
Office of Quality and Regulatory Compliance
PO Box 1663, MS M984
Los Alamos, New Mexico 87545

Joseph Murdock, Program Manager Newport News Nuclear BWXT-Los Alamos, LLC Regulatory and Stakeholder Interface 600 6th Street Los Alamos, NM 87544

RE: Request for Additional Information for Los Alamos National Laboratory Underground Injection Control Wells, Discharge Permit 1835

Dear M. Lee Bishop and Joseph Murdock:

On July 8, 2021, the New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) received an application for renewal and modification for the Los Alamos National Laboratory Underground Injection Control Wells from the U.S. Department of Energy (DOE) and Newport News Nuclear (N3B), collectively the Permittees for Discharge Permit 1835 (DP-1835). NMED has reviewed the application in accordance with the New Mexico Water Quality Control Commission Regulations (20.6.2 NMAC).

The renewal and modification application proposes an increase in the quantity discharged from 648,000 gallons per day (gpd) to 1,500,000 gpd. The application states that the proposed increase is "to allow for increases in the treatment of the chromium plume." NMED notes that the Permittee did not provide any calculations nor groundwater modeling to support their request. To consider the Permittee's request, NMED requires, at a minimum, that the Permittee provide a groundwater model and supporting documentation that demonstrates and displays:

- 1. The reasoning for the proposed increase of the injection rate with supporting calculations.
- 2. Evidence that the aguifer can take the proposed additional daily injection rate.
- 3. The location and depth of penetration of the new injection points.
- 4. That the requested increased rate and injection wells will perform as expected to control plume migration along the entire thickness of the plume.

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5. That the requested increased rate and new injection locations will not create undesirable plume movement.

Please submit the requested information to NMED within 45 days of the date of this letter, **by DATE**. NMED appreciates your cooperation. If you have any questions, please contact either Andrew Romero at (505) 660-8624 or Melanie Sandoval at (505) 660-7892.

Sincerely,



JB:ar

cc: Melanie Sandoval, NMED GWQB
Patrick Longmire, NMED GWQB
Rick Shean, NMED HWB
Neelam Dhawan, NMED HWB
Christopher Krambis, NMED HWB
Christian T. Maupin, N3B