



November 20, 2023

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

**RE: REVIEW**  
**PLUGGING AND ABANDONMENT SUMMARY REPORT FOR ALLUVIAL WELLS AND**  
**GROUNDWATER OBSERVATION WELLS IN ANCHO CANYON FOR FISCAL YEAR 2023**  
**LOS ALAMOS NATIONAL LABORATORY (LANL)**  
**EPA ID #NM0890010515**  
**LANL-23-062**

Dear Mr. Duran:

The New Mexico Environment Department (NMED) has received the United States Department of Energy's (DOE) *Plugging and Abandonment Summary Report for Alluvial Wells and Groundwater Observation Wells in Ancho Canyon for Fiscal Year 2023* (Report), dated September 2023 and referenced by EM2023-0613. The Report was received by NMED on September 12, 2023.

NMED reviewed the Report and has the following comments:

**1. Section 3.1, *Water Level and Total Depth Measurements*, pg. 2.**

**DOE Statement:** "At wells ASC-0, ASC-2, ASC-4, ASC-12, ASC-13, ASC-15, ASC-16, ASC-17, and ASC-18, water was present and required bailing. The total volume of water collected was 11.5 gal."

**NMED Comment:** Provide clarification regarding volumes of water removed from each of the listed wells. Provide analytical results of the waste characterization samples and describe how bailed water will be disposed of.

**2. Section 3.1, *Water Level and Total Depth Measurements*, pg. 2.**

**DOE Statement:** "The total depth of each well was measured and listed in Table 2.0-1. The total depth of ASC-2 could not be measured."

**NMED Comment:** Provide clarification regarding why total depth could not be measured and provide evidence that the P&A tremie pipe injected plugging material to the bottom of borehole ASC-2.

3. **Section 4.1, Wells and Boreholes at Solid Waste Management Unit 39-001(a), pg. 3.**

**DOE Statement:** "During the 2009 investigation and remediation of SWMU 39-001(a), the PVC casing of borehole ASC-3 was cut (LANL 2010, 108592) and a bentonite plug was placed over the protruding 2-in PVC."

**NMED Comment:** Provide clarification regarding whether the plugging method used for borehole ASC-3 is supported by the New Mexico Office of the State Engineer (NMOSE) regulations. If NMOSE regulations do not support the plugging operation used for ASC-3, DOE must appropriately plug & abandon borehole ASC-3 to NMOSE standards.

NMED notes that this is a plugging and abandonment report and this review does not constitute approval of the reference documents and content of the Report. Please provide a response to NMED comments within 45 days of receipt of this letter.

Should you have any questions regarding this correspondence, please contact Michael Petersen of my staff at (505) 690-5107.

Sincerely,

**Rick Shean**

Digitally signed by Rick

Shean

Date: 2023.11.20

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Rick Shean

Designated Agency Manager, Hazardous Waste Bureau  
Director, Resource Protection Division, NMED

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File: LANL 2023, Review, Plugging and Abandonment Summary Report for Alluvial Wells and Groundwater Observation Wells in Ancho Canyon for Fiscal Year 2023  
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