



Environmental Programs
P.O. Box 1663, MS M991
Los Alamos, New Mexico 87545
(505) 606-2337/FAX (505) 665-1812



National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
(505) 667-4255/FAX (505) 606-2132

Date: **MAR 17 2011**
Refer To: EP2011-0122

James Bearzi, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for Extension for the Buckman Well Field Alternative Monitoring Project

Dear Mr. Bearzi:

Los Alamos National Laboratory (the Laboratory) requests an extension from the current due date of April 1, 2011, to submit the determination on the suitability of the piezometers in the Buckman Well Field for groundwater monitoring.

In the New Mexico Environment Department's (NMED's) September 1, 2010, approval with modifications for the work plan for alternative monitoring at Buckman Well Field, NMED stipulated a date of April 1, 2011, to submit a groundwater-monitoring report supporting the Laboratory's findings. Because of unforeseen complications in determining ownership for the piezometers and in acquiring the necessary discharge permits from the Groundwater Quality Bureau, work cannot be completed by the NMED-required date.

The determination of ownership has been largely out of the Laboratory's control and greatly complicated by the multiagency history of the piezometers in the well field. Specifically, it is now the Laboratory's understanding that the piezometers were drilled on U.S. Forest Service land by the U.S. Geological Survey for the Public Service Company of New Mexico (PNM) and that PNM may have transferred ownership of the piezometers, with the water utility, to the City of Santa Fe. The City of Santa Fe recently agreed both to accept an ownership role and to take the lead on obtaining the discharge permits for water produced during development and other purging activities.

In addition, the program for the City of Santa Fe's (the City's) utilization of the Buckman Well Field is in flux with the Buckman surface water diversion now online. The City of Santa Fe informed the Laboratory that it may take up to 1 year to develop its program to operate the well field. The overall utility of the Laboratory's current approved work plan for the Buckman piezometers may be impacted by the City of Santa Fe's near-term plans for operations in the well field. For example, if wells other than Buckman #1 and #8 are used for production, then the value of monitoring the nearby SF-2, SF-3, SF-4, and SF-5 piezometers may have less value. It is the Laboratory's understanding that none of the wells in the Buckman Well Field are currently in

production. Therefore a new proposed date cannot be determined at this time, given the factors discussed above.

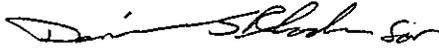
Discussions among the City of Santa Fe, the Laboratory, and U.S. Department of Energy-Los Alamos Site Office legal groups are still underway to formalize ownership and obtain appropriate access agreements. In the interim, the Laboratory will continue to work with the City of Santa Fe to ensure that the ongoing program of quarterly monitoring of water-supply wells is optimized. The Laboratory also proposes to meet with NMED at the earliest possible opportunity to discuss the path forward for this project. Participation of the representatives of the City of Santa Fe may also be appropriate at the initial or at followup meetings. Your consideration of this request is appreciated.

If you have any questions, please contact Ted Ball at (505) 665-3996 (tedball@lanl.gov) or Woody Woodworth at (505) 665-5820 (lwoodworth@doeal.gov)

Sincerely,


Michael J. Graham, Associate Director
Environmental Programs
Los Alamos National Laboratory

Sincerely,


George J. Rael, Manager
Environmental Projects Office
Los Alamos Site Office

MG/GR/CD/TB:sm

Cy: Laurie King, EPA Region 6, Dallas, TX
Steve Yanicak, NMED-DOE-OB, MS M894
Tom Skibitski, NMED-OB, Santa Fe, NM (date-stamped letter emailed)
Woody Woodworth, DOE-LASO, MS A316 (date-stamped letter emailed)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Ted Ball, EP-CAP, MS M992 (date-stamped letter emailed)
Craig Douglass, EP-CAP, MS M992 (date-stamped letter emailed)
Michael J. Graham, ADEP, MS M991 (date-stamped letter emailed)
William Alexander, EP-BPS, MS M992 (date-stamped letter emailed)
RPF, MS M707