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NOV 2010
NMED Hazardous Waste Bureau

National Nuclear Security Administration
Los Alamos Site Office, MS A316
Environmental Restoration Program
Los Alamos, New Mexico 87544
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Date: NOV 12 2010
Refer To: EP2010-0528

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 Submittal of Proposed Location for Well R-59 and Well Completion Date

Dear Mr. Bearzi:

The purpose of this letter is to request extensions to the date for submitting a location map for regional monitoring well R-59, which is to be sited near Material Disposal Area (MDA) C, and the date for completing well R-59. Los Alamos National Laboratory (the Laboratory) submitted the Drilling Work Plan for Well R-59 (EP2010-0382) to the New Mexico Environment Department (NMED) on September 30, 2010. The drilling work plan did not contain a proposed location for well R-59 because the original location for the well was inaccessible given the construction activities associated with a new parking lot located to the south of MDA C. The transmittal letter for the drilling work plan proposed that the Laboratory will submit a location for well R-59 to NMED by November 15, 2010, following evaluation of water-level data from newly constructed well R-60 and consideration of areas that would not be impacted by construction of the new parking lot.

Since submitting the drilling work plan, the Laboratory has evaluated the water-level data for well R-60 and has used these and other water-level data to evaluate the monitoring effectiveness of alternate locations for well R-59 outside the footprint of the new parking lot. This evaluation shows the alternate locations do little to increase the monitoring effectiveness beyond what is now provided by well R-60. In addition to water-level data, the vapor-monitoring data from the four new deep vapor-monitoring wells currently being installed at and near MDA C will be an important consideration in siting well R-59. Of specific interest is the southerly extent of the vapor plume, which will be defined by two of the new vapor wells. In a telephone conference with Messrs. David Cobrain, Michael Dale, and Jerzy Kulis of your staff on November 10, 2010, it was recommended that the decision of where to locate well R-59 be deferred until two rounds of monitoring data from the new deep vapor wells have been collected and evaluated. These wells are currently being installed. Because these wells are being drilled using air-rotary methods, loss of air to the formation is anticipated, and the Laboratory does not plan to sample these wells immediately upon completion. Based on the current drilling and well-construction schedule, it is expected the wells will be completed by mid-January 2011 and sampled in February and April 2011. Therefore, the

Laboratory is requesting an extension for submitting a proposed location of well R-59 until May 31, 2011.

Because the date for locating well R-59 is being extended, an extension is also requested for the deadline to complete this well. NMED's approval of the proposed date for submitting of the Corrective Measures Evaluation Report for MDA C, dated July 16, 2010, established a date of February 28, 2011, for completing well R-59. Based on the schedule for completing and sampling the new vapor wells and locating well R-59, a new well completion date of August 31, 2011, is requested.

The requested extensions will affect the information presented in the Phase III investigation report for MDA C. In the NMED-approved Phase III investigation work plan for MDA C, the Laboratory proposed presenting at least two rounds of data from the four new vapor monitoring wells, R-59, and R-60 in the Phase III investigation report, which is due June 30, 2011. Based on the new schedule for installing well R-59, the Phase III investigation report will now be submitted without data from R-59. As discussed in the telephone conference, it is expected that data from well R-59 will be collected while the report is being reviewed and will be incorporated into a revised investigation report.

If you have any concerns with this proposed approach or require any additional information, please contact Stephani Fuller at (505) 606-1628 (sfuller@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (crodriquez2@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/SF:sm

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