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Date: FEB 0 2 2012
Refer To: EP2012-0038

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

Subject: Request for an Additional Extension to Plug and Abandon Test Well 3

Dear Mr. Kieling:

The purpose of this letter is to request an extension of the due date for plugging and abandoning Test Well (TW) 3 in Los Alamos Canyon because of additional changed conditions discovered at H-19 on January 26, 2012. This request is in addition to the request submitted on January 20, 2012, and approved on January 27, 2012

As of Wednesday, January 25, 2012, well H-19 had been plugged and abandoned from 530 ft below ground surface (bgs) to 95 ft bgs following perforation of the casing and grout injection with the placement of bentonite chips. On Thursday, January 26, 2012, the 12-in. casing was cut at 60 ft bgs. The plan was to cut and extract the top 60 ft of casing, then backfill the remaining open borehole. Following the cutting of the casing, the subcontractor began pulling on the 60-yr old casing, which parted at 7 ft bgs.

Subsequent consultation with the New Mexico Office of the State Engineer resulted in a plan to complete the plugging and abandonment in an approved manner by filling the inside of the 12-in. casing with bentonite chips up to 20 ft bgs and then grouting up to 7 ft bgs, followed by overdrilling the 12-in. casing down to 15–20 ft bgs and grouting the backside of the 12-in. casing and the open borehole to the surface.

On Monday, January 30, 2012, new problems were encountered when the borehole could not be advanced past the top of the 12-in. casing at 7 ft bgs without the borehole caving back in on the overreaming bit. Additional time is now required to cement the overdrilling zone, wait for the cement to partially cure, and then redrill this interval in an effort to overdrill down to 15–20 ft bgs. This effort may take several cycles to complete.

The additional work scope involved in the overdrilling is expected to result in a delay of approximately 10 work days. However, because Los Alamos National Laboratory (the Laboratory) anticipates encountering similar casing issues at TW-3 (an old well), we are requesting a total of 6 additional weeks to complete TW-3. The current plan is to move from H-19 to TW-3, which means, barring changing conditions, the Laboratory may complete TW-3 in significantly less time than we are requesting. However, because changed conditions and other problems were encountered in each of the recent plugging and abandonment efforts, especially in the older wells, the Laboratory requests 4 weeks of contingency to address issues without additional extension requests.

The Laboratory therefore requests an extension of the due date for plugging and abandoning TW-3 from February 10, 2012, to March 23, 2012. This extension will also impact the delivery of the plugging and abandonment report for TW-3, delaying it from the current due date of March 31, 2012, to a new date of April 20, 2012.

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

Sincerely,

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

Sincerely,

George J. Rael, Assistant 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)
Annette Russell, DOE-LASO (date-stamped letter emailed)
Hai Shen, DOE-LASO, MS A316 (date-stamped letter emailed)
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