

Environmental Programs
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Date: September 16, 2008

Refer To: EP2008-0517

James P. 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 to Submit the Well Completion Report for the Replacement

Wells for R-25 Screens 1 and 3

Dear Mr. Bearzi:

The Los Alamos National Security, LLC (LANS) and the U.S. Department of Energy request an extension from September 30, 2008, to October 27, 2008, to submit the completion report for well R-25b. Technical difficulties and safety issues while drilling well R-25c have prevented drilling of well R-25b in a timely manner to meet the September 30, 2008, date for submittal of a well completion report that contains the information on both R-25b and R-25c.

Wells R-25b and R-25c are new wells to replace screens 1 and 3 for the current well R-25. These two wells were determined to be critical to support the corrective measures evaluation for cleanup of contaminated intermediate groundwater beneath Technical Area (TA-16).

Work began on June 18, 2008, after a single contract was awarded for both R-25b and R-25c. The schedule for completion and development of both wells was on track for August 27, 2008. However, beginning the week of July 15, 2008, we encountered the first of several significant technical and mechanical problems, followed by a safety incident, that caused more than 27 days of delays to this project. For example, one of several problems encountered at R-25c include unstable borehole and caving beneath the water table, resulting in several lost days and lost drilling equipment within the hole after caving.

In August 2008, LANS put in place a recovery plan to recoup as much lost time as possible with the intent of meeting our regulatory obligations by September 30, 2008. A 24-hour per day drilling schedule was established and maintained until a safety incident occurred during the last week of August, causing all drilling activities at Los Alamos National Laboratory to cease.

On August 26, 2008, the drilling crew at R-25 experienced a "near-miss" safety incident and a stop-work notice was immediately issued. During the next 2 weeks, safety and operational readiness critiques were conducted, and an overall working-safety environment assessment was conducted.

The stand down was in effect until the afternoon of September 9, 2008, and work did not resume on R-25c until September 10.

Work on R-25c is nearing completion, and LANS has begun drilling at R-25b. We expect to submit the well completion report for R-25c to the New Mexico Environment Department (NMED) by the September 30, 2008, due date. However, because of the technical difficulties encountered in construction of R-25c, coupled with the recent safety incidents, we are approximately 1 month behind schedule on completing the field work and the report for R-25b.

In summary, along with a significant safety incident, we have experienced unanticipated work stops as a result of equipment failure and/or breakage. Together, these uncontrollable events have caused over 27 days in delays to our schedule for completion of this work. We therefore request the due date for submission of the R-25b well completion report be extended to October 27, 2008. Your understanding regarding the technical and safety issues encountered in the construction of these wells and a favorable determination on the extension request are greatly appreciated.

If you have any questions please contact Paul Huber at (505) 606-2225 (huberp@lanl.gov) or Nancy Werdel at (505) 665-3619 (nwerdel@doeal.gov).

Sincerely,

Susan G. Stiger, Associate Director

Environmental Programs

Los Alamos National Laboratory

Sincerely,

David R. Gregory, Project Director

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