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James Bearzi, Bureau Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6303 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: DEC 1 0 2010 Refer To: EP2010-0553

Subject: Request for Extension to Complete Regional Aquifer Well R-25r (R-63)

Dear Mr. Bearzi:

Los Alamos National Laboratory (the Laboratory) requests an extension to the December 31, 2010, deadline to complete well R-63 (formerly R-25r) specified in the July 15, 2010, Approval with Modifications Drilling Work Plan for Regional Aquifer Well R-25r and Proposed Disposition of Scheduled Well R-47. This proposal for an extension was discussed with Mr. Michael Dale of your staff via telephone on December 1, 2010.

As discussed with Mr. Dale, several developments have impacted the Laboratory's schedule to complete this well. The main impact is due to the limited availability of drilling rigs and crews capable of drilling this well. Rig availability was affected by a general shortage of rigs and crews, as well as the transition of the well drilling program from the American Reinvestment and Recovery Act (ARRA) program to the Laboratory's Base Program. This transition required a complete restructuring of the execution plan and procurement process for this well. This effort was completed in late November 2010. During the time this transition was underway, the drilling rig planned for drilling R-63 was reassigned to install Material Disposal Area (MDA) C vapor-monitoring wells so that the rig would not be demobilized off the Laboratory. An alternate, smaller rig was recently mobilized to MDA C so that the larger rig originally scheduled to drill R-63 could be reassigned back to R-63. This rig is now scheduled to begin drilling operations at R-63 the week of December 13, 2010.

The project has also experienced delays in mobilization activities and expects to experience delays in drilling because of site operations. Access to the R-63 drill site must be gained through the Technical Area 16 burning grounds, and the drill site is not accessible during open-burning operations. The frequency of open burning has recently increased and is expected to remain at an increased level for the remainder of 2010. This will limit the amount of time available for drilling activities.

James Bearzi

Given the above developments, the Laboratory has prepared a plan to achieve "NMED complete" status for R-63 by February 28, 2011. Therefore, in accordance with Section IV.A.5.d of the Compliance Order on Consent, the Laboratory requests a 2-month extension, until February 28, 2011, to complete well R-63. This extension is not expected to impact the completion date for the 260 Outfall aquifer test.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Woody Woodworth at (505) 665-5820 (lwoodworth@doeal.gov).

Sincerely,

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

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

MG/GR/DM/JM:sm

Cy: Laurie King, EPA Region 6, Dallas, TX Tom Skibitski, NMED-OB, Santa Fe, NM Steve Yanicak, NMED-DOE-OB, MS M894 Woody Woodworth, DOE-LASO, MS A316 Annette Russell, DOE-LASO (date-stamped letter emailed) John McCann, EP-CAP, MS M992 (date-stamped letter emailed) Dave McInroy, 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