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NMED Hazardous Waste Bureau

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Date: JAN 3 1 2014 Refer To: EP2014-0035

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

Subject: Justification for Not Drilling Well SCI-4

Dear Mr. Kieling:

This letter serves to provide the New Mexico Environment Department (NMED) with the justification not to drill well SCI-4 and, therefore, requests that the requirement for the drilling work plan, due on February 15, 2014, be eliminated.

In their March 17, 2011, letter (EP2011-0121), U.S. Department of Energy and Los Alamos National Security, LLC (DOE/LANS) provided NMED with the status of well SCI-4, indicating R-62 must be completed before a work plan for drilling SCI-4 could be submitted. Data collected during the drilling of R-62 would be used to assess whether perched groundwater was observed, which would determine the need for perched-intermediate well SCI-4.

On September 2, 2011, DOE/LANS submitted a letter (EP2011-0300) to NMED requesting an extension to February 15, 2012, to submit the work plan because it was not clear whether the well was necessary. NMED granted the request in its September 14, 2011, letter and directed DOE/LANS either to submit a work plan or "to provide a written justification that well SCI-4 is not needed and that the existing groundwater monitoring network provides sufficient information on the western extent and flow direction of perched groundwater and chromium contamination present in the vicinity of well SCI-2."

In their November 10, 2011, letter (EP2011-0388), DOE/LANS requested a second extension to a new date of February 15, 2014, to submit the work plan; NMED granted the request on November 21, 2011.

Based on the results presented in the Well Completion Report for Regional Well R-62 (EP2012-0037), well SCI-4 was not required. Although perched water had been observed, borehole videos and water-level data indicated the perched zone of interest in the lower part of the Cerros del Rio basalt was not productive enough to support a perched-intermediate well.



In addition, the limited perched water identified in the R-62 borehole and in SCI-3 provides sufficient information on the western extent of the perched-intermediate zone monitored in SCI-2. Additional pumping planned for SCI-2 in fiscal year 2014 will continue to provide information on the nature of the perched-intermediate zone in the vicinity of well.

If you have any questions, please contact Steve Paris at (505) 606-0915 (smparis@lanl.gov) or David Rhodes at (505) 665-5325 (david.rhodes@nnsa.doe.gov).

Sincerely,

Jeff Mousseau, Associate Director Environmental Programs Los Alamos National Laboratory Sincerely,

Peter Maggiore, Assistant Manager Environmental Projects Office Los Alamos Field Office

## JM/PM/DM/SP:sm

Cy: Laurie King, EPA Region 6, Dallas, TX (date-stamped letter emailed)

Tom Skibitski, NMED-DOE-OB (date-stamped letter emailed)

Steve Yanicak, NMED-DOE-OB, MS M894

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Annette Russell, DOE-NA-00-LA (date-stamped letter emailed)

Keith Flodstrom, DOE-NA-00-LA (date-stamped letter emailed)

David Rhodes, DOE-NA-00-LA (date-stamped letter emailed)

Peter Maggiore, DOE-NA-00-LA (date-stamped letter emailed)

Katie Roberts, EP-REG (date-stamped letter emailed)

Tori George, EP-REG (date-stamped letter emailed)

Steve Paris, EP-CAP (date-stamped letter emailed)

Kent Rich, EP-CAP (date-stamped letter emailed)

Dave McInroy, EP-CAP (date-stamped letter emailed)

Dan Cox, ADEP (date-stamped letter emailed)

Jeff Mousseau, ADEP (date-stamped letter emailed)

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