

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

ERID-521801



DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

THOMAS SKIBITSKI
Acting Director
Resource Protection Division

EP2013-5014

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 11, 2013

Peter Maggiore
Assistant Manager, Env. Projects Office
Los Alamos Site Office, DOE
3747 West Jemez Rd, MS A316
Los Alamos, NM 87544

Jeffrey D. Mousseau
Associate Director, Environmental Programs
Los Alamos National Security, L.L.C.
P.O. Box 1663, MS M991
Los Alamos, NM 87545

**RE: APPROVAL WITH MODIFICATION
WORK PLAN TO PLUG AND ABANDON WELL R-25
LOS ALAMOS NATIONAL LABORATORY
EPA ID#NM0890010515
HWB-LANL-12-022**

Dear Messrs Maggiore and Mousseau:

The New Mexico Environment Department (NMED) is in receipt of the United States Department of Energy (DOE) and the Los Alamos National Security, L.L.C.'s (collectively, the Permittees) document entitled *Work Plan to Plug and Abandon Well R-25* (Plan) dated December 13, 2012 and referenced by EP2012-0256. NMED has reviewed the Plan and hereby issues this approval with the following modification.

1. The Permittees propose to pressure grout the entire R-25 well casing with neat cement, including screens 1 to 9. R-25 screen 1 straddles the upper-deep perched intermediate zone currently being monitored at wells R-25b, CdV-16-1(i), and CdV-16-4ip. The lateral distances from R-25 to the wells R-25b, CdV-16-1(i), and CdV-16-4ip are approximately 25 feet (ft) (west), 370 ft (north) and 450 ft (east), respectively. Because of the close proximity of these well screens to R-25 screen 1, there is a potential for their impairment as a result of migration of cement from screen 1. R-25b, located only 25 ft away, will most likely be affected if screen 1 at R-25 is perforated and pressure grouted with cement as described in the Plan. Instead of setting cement at screen 1, the Permittees must install a sand plug (e.g.,

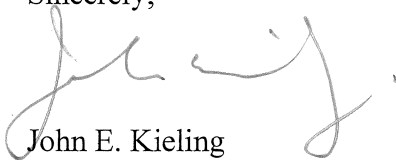
30/70 sand) at screen 1 from approximately 720 ft to 770 ft below ground surface.

The Plan states that the plugging and abandonment of R-25 is contingent on the implementation of a tracer test as described in the Permittee's document titled "Work Plan for a Tracer Test at Consolidated Unit 16-021(c)-99, Technical Area 16", dated January 30, 2012 (EP2012-0017). The tracers were initially required to be deployed no later than October 15, 2012 as directed in NMED's letter titled "*Approval with Modification Work Plan for a Tracer Test at Consolidated Unit 16-021(c)-99, Technical Area 16*", dated February 7, 2012. On July 31, 2012 the Permittees submitted an extension request (see: EP2012-0167) to NMED for deployment of the tracers from the original date of October 15, 2012 to January 27, 2013; the extension request was granted by NMED on August 9, 2012. On November 5, 2012, the Permittees submitted another extension request, from January 27, 2013 to May 30, 2013. The request was granted by NMED on November 20, 2012.

Due to the prolonged time period required to conduct the tracer test, and in order to prevent further delay in plugging and abandoning R-25, the Permittees must deploy the tracers to wells R-25b and CdV-16-1(i) no later than **May 30, 2013**, as requested. Assuming R-25 will no longer be needed for the tracer test, the Permittees must plug and abandon R-25 by **June 30, 2014**, as scheduled in the Plan. A field summary report for the plugging and abandonment of R-25 must be submitted to NMED within 90 calendar days after the completion of plugging and abandonment activities.

Should you have any questions, please contact Michael Dale of my staff at (505) 661-2673.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
B. Wear, NMED HWB
J. Kulis, NMED HWB
M. Dale, NMED HWB
J. Schoepner, NMED GWQB
S. Yanicak, NMED DOE OB, MS M894
L. King, EPA 6PD-N
S. Rydeen, San Ildefonso Pueblo
J. Chavarria, Santa Clara Pueblo
M. Everett, EP-ET, MS M992

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S. Paris, EP-CAP, MS M992
C. Rodriguez, DOE-LASO, MS A316
H. Shen, DOE-LASO, MSA316
W. Woodworth, DOE-LASO, MS A316

File: Reading and LANL 2013, Work Plan Plug and Abandon Well R-25