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Date: **JUL 15 2014** Refer To: EP2014-0311

John Kieling, 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 Interim Measures Report for Source Removal

Testing at Well CdV-16-4ip

Dear Mr. Kieling:

This letter requests an extension from the July 31, 2014, date to submit the Interim Measures Report for Source Removal Testing at Well CdV-16-4ip to a new date of September 30, 2014. The U.S. Department of Energy and Los Alamos National Security, LLC (DOE/LANS) request this extension under Section III.J.2 of the March 2005 Compliance Order on Consent. The aquifer test start date was delayed from October 1, 2013, to May 19, 2014, because of the federal government shutdown from October 1 to October 16, 2013. The aquifer test start date was delayed from October 2013 to spring 2014 because of the federal lapse in appropriations from October 1 to October 16, 2013. The aquifer test could not begin immediately after the lapse in appropriations because the 45- to 60-day duration of the test would have extended into mid-December when restrictions related to land-application of treated water on frozen ground were in effect. As a result, the testing was rescheduled until late spring 2014, as identified in the evaluation of force majeure events of November 7, 2013.

As stated in the interim measures work plan, the work consists of conducting a 45- to 60-day extended pumping test at well CdV-16-4ip to determine the potential to effectively remove RDX (hexahydro-1,3,5-trinitro-1,3,5-triazine) and volatile organic compounds in the perched intermediate zone beneath Cañon de Valle. Although not as early as planned, the aquifer testing began on June 5, 2014, and currently the plan is to continue the pumping for a full 60 days because groundwater levels and RDX data are providing valuable information for the aquifer test. The pumping phase of the test is scheduled to be completed on August 4, 2014. Water-level monitoring and rebound sampling may take an additional 30 days.



Data collected to date during the pumping operations at CdV-16-4ip show a clear pressure response from pumping at CdV-16-4ip in R-25 screen 2 and little to no apparent pressure response in R-25 screen 1. Pressure responses at other nearby observation wells [R-25b, CdV-16-1(i), and CdV-16-2(i)r] have not yet been observed but may ultimately be observed during the latter part of the 60-day pumping test.

The requested submittal date of September 30, 2014, will allow sufficient time to conduct the full 60-day pumping test for CdV-16-4ip, allow the best opportunity to observe pressure responses at other nearby observation wells, to complete rebound monitoring and data analysis, and to prepare the interim measures report.

If you have any questions, please contact John McCann at (505) 665-1091 (jmccann@lanl.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@nnsa.doe.gov).

Sincerely,

Jeff Mousseau, Associate Director

**Environmental Programs** 

Los Alamos National Laboratory

Sincerely,

Peter Maggiore, Assistant Manager

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Environmental Projects Office

Los Alamos Field Office

JM/PM/DM/JM:sm

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