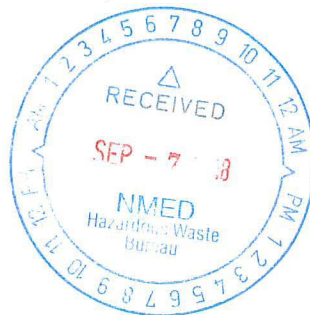




DEPARTMENT OF ENERGY
Environmental Management Los Alamos Field Office (EM-LA)
Los Alamos, New Mexico 87544



SEP 07 2018

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

Dear Mr. Kieling:

Subject: Request for Extension of Well R-69 Field Completion Milestone

The U.S. Department of Energy (DOE) is requesting a milestone extension for well completion and collection of the first samples from regional aquifer well R-69. As indicated in the Fiscal Year (FY) 2018 version of the Appendix B Milestones and Targets table in the 2016 Compliance Order on Consent (the Consent Order), Milestone #13, R-69 Field Completion, stipulates the well would be complete and the first samples would be collected by September 28, 2018. For the reason outlined below, DOE has determined that this date for collection of the first samples is no longer attainable. Therefore, DOE is using the process outlined in the Consent Order, Section XXVIII, *Extensions*, to submit a request for an extension for the above-mentioned milestone to a new date of **December 14, 2018**. The revised milestone will be incorporated into Appendix B pursuant to the process set forth in Section VIII.C (*Campaign Approach*). Furthermore, in accordance with Section XXXV.A.3, *Stipulated Penalties*, Milestone #13 mentioned above is no longer a milestone for FY 2018 and is herein deleted from the FY 2018 milestone list.

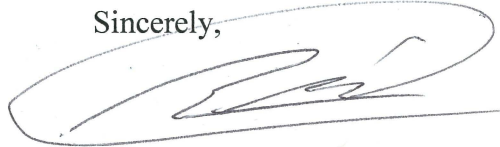
Newport News Nuclear BWXT – Los Alamos, LLC (N3B) was issued a Notice to Proceed by DOE for the Los Alamos Legacy Cleanup Contract on April 30, 2018, and immediately began a deliberate startup of field operations, with a focus on a safe restart of activities. While N3B believed at the initiation of the well drilling on July 28 (after Stage III fire restrictions were lifted and drillers were available) that there would be enough time to complete Milestone #13 by the due date, there was essentially no schedule contingency, and any further delays or disruptions would make it impossible to meet the milestone due date. On August 4, drillers encountered a boulder in the borehole wall at a depth of 763 ft below ground surface. This boulder created an obstruction that caused a deflection in the casing that was being advanced during drilling activities. The obstruction prevented drilling tools from passing, and the deflection created damage to the casing and the down-hole tools. The time spent attempting to drill through the boulder was unproductive and resulted in lost time. After unsuccessfully attempting to advance the borehole beyond this depth, the drillers were forced to plug and abandon the hole, move the rig 15 ft away from the original hole, and begin re-drilling. The new well has already been advanced beyond the depth at which the boulder was encountered, but the time spent for necessary rework now makes it impossible to meet the milestone deadline, thus necessitating this extension request. DOE therefore requests an extension for good cause, specifically under

Example #6 provided in Consent Order Section XXVIII.C due to the unanticipated damage/breakage of the drilling equipment, which resulted in additional time necessary to complete drilling at well R-69.

Because the well R-69 drilling project is performed under the RDX Characterization Campaign, there is also a potential impact to the schedule for related Milestone #10, Investigation Report for Deep Groundwater, due June 28, 2019, as proposed in the list of FY 2019 Appendix B Milestones transmitted by DOE to the New Mexico Environment Department (NMED) on July 31, 2018. This milestone depends on the collection of representative chemical data from well R-69. N3B technical staff will work collaboratively with their NMED counterparts to evaluate these data as they become available.

If you have any questions, please contact Joseph Legare at (505) 309-1346 (joseph.legare@em-la.doe.gov) or Cheryl Rodriguez at (505) 665-5330 (cheryl.rodriguez@em.doe.gov).

Sincerely,



Arturo Duran
Designated Agency Manager
Environmental Management
Los Alamos Field Office

cc:

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