

APPENDIX C

CAMPAIGNS

Appendix C – Campaigns

C.1 – Campaigns

There are 17 Campaigns under the 2016 Compliance Order on Consent, as revised in 2024, (Consent Order). The status of each of the Campaigns is provided in Table C.1-1.

Table C.1-1 – Consent Order Campaigns Status

Campaign Status	Number of Campaigns
Completed	1
In Progress	16
Not Started	0

Table C.1-2 lists the 17 Campaigns under the Consent Order in order of highest to lowest priority. There are 6 Class A Campaigns and 10 Class B Campaigns. Class A Campaigns are discussed in Section C.2 of this Appendix. Class B Campaigns are discussed in Section C.3 of this Appendix. Section C.4 of this Appendix discusses the completed Campaigns.

Table C.1-2 – Consent Order Campaigns, Prioritization of Campaign, and Campaign Classification

Campaign Letter	Campaign	Status	Campaign Prioritization	Campaign Class
A.	Hexavalent Chromium Campaign	In Progress	The Department of Energy (DOE) and New Mexico Environment Department (NMED) agree that Hexavalent Chromium Campaign is the highest priority Campaign to monitor the chromium plume and minimize/reduce risk to human health and the environment.	B
B.	Supplemental Investigation Reports Campaign	In Progress	<p>The Supplemental Investigation Reports Campaign is listed as the second Campaign priority due to the status of work completed to date and the amount of work remaining to complete the Campaign. The following activities must be performed to complete the Campaign.</p> <ul style="list-style-type: none"> NMED review to review/issue Certificates of Completion (CoCs) for 36 Solid Waste Management Units (SWMUs)/Areas of Concerns (AOCs) 	A

Campaign Letter	Campaign	Status	Campaign Prioritization	Campaign Class
C.	Historical Properties Completion Campaign	In Progress	The Historical Properties Completion Campaign is listed as the third Campaign priority as field investigations have been initiated but additional field work is required in some of the Aggregate Areas. Activities are continuing to occur in order to complete work for this Campaign.	A
D.	Southern External Boundary Campaign	In Progress	The Southern External Boundary Campaign is listed as the fourth Campaign priority as the majority of SWMUs/AOCs within the Aggregate Areas in this Campaign have field work completed or are pending NMED approval of Investigation Reports. Prioritizing work within this Campaign to complete the remaining work to close out Campaign.	A
E.	Pajarito Watershed Campaign	In Progress	Pajarito Watershed Campaign is the fifth Campaign priority, as field investigations have been initiated but additional field work is required. Activities are continuing to occur, but resources are being focused on higher priority Campaigns.	A
F.	Sandia Canyon Watershed Campaign	In Progress	Sandia Canyon Watershed Campaign is the sixth Campaign priority based upon current field work completed, funding availability, and resources being focused on higher priority Campaigns. Work will resume upon completion of the higher priority Campaigns.	A
G.	Upper Water Watershed Campaign	In Progress	The Upper Water Watershed Campaign is the seventh Campaign priority based upon the amount of field investigations remaining to be completed. Work will resume upon completion of the higher priority Campaigns.	A
H.	Royal Demolition Explosives (RDX) Campaign	In Progress	RDX Campaign is the eighth Campaign priority, which is based upon the resources required to continue performing ground water monitoring activities and subsequent reporting regarding the RDX plume concentrations at existing wells.	B

Campaign Letter	Campaign	Status	Campaign Prioritization	Campaign Class
I.	Material Disposal Area C Remedy Campaign	In Progress	Material Disposal Area C is the ninth Campaign priority. The priority is based upon the resources required to continue performing soil vapor monitoring activities and subsequent reporting. MDA C is currently in an administrative proceeding.	B
J.	Material Disposal Area L Remedy Campaign	In Progress	Material Disposal Area L is the tenth Campaign priority, which is based upon the resources required to continue performing soil vapor extraction operations under the Interim Measure to continue data collection that will inform the Corrective Measures Evaluation process. Material Disposal Area L, is located underneath Area L at Technical Area (TA) 54. There are multiple Resource Conservation and Recovery Act permitted hazardous waste management units located in Area L.	B
K.	Material Disposal Area H Remedy Campaign	In Progress	Material Disposal Area H is the eleventh Campaign priority. NMED must review the 2023 Corrective Measure Evaluation Report for Material Disposal Area H and issue a Statement of Basis before work can continue within this Campaign.	B
L.	Material Disposal Area AB Remedy Campaign	In Progress	Material Disposal Area AB is the twelfth Campaign priority, which is based upon field work remaining to be completed, funding availability, and resources being focused on higher priority Campaigns.	B
M.	Material Disposal Area A Remedy Campaign	In Progress	Material Disposal Area A is the thirteenth Campaign priority, which is based upon work remaining to be completed, funding availability, and resources being focused on higher priority Campaigns.	B
N.	Material Disposal Area T Remedy Campaign	In Progress	Material Disposal Area T is the fourteenth Campaign priority, which is based upon work remaining to be completed, funding availability, and resources being focused on higher priority Campaigns.	B
O.	Material Disposal Area G Remedy Campaign	In Progress	Material Disposal Area G is the fifteenth Campaign priority, which is based upon work remaining to be completed, funding availability, and resources being focused on higher priority Campaigns. Material Disposal Area G, is located underneath Area G at TA-54. Advancing the Corrective Measure	B

Campaign Letter	Campaign	Status	Campaign Prioritization	Campaign Class
			Evaluation for Material Disposal Area G is a low priority given that there are multiple Resource Conservation and Recovery Act permitted hazardous waste management units located in Area G. Therefore, advancing the Corrective Measure Evaluation process is a lower priority at this time given the current status of the area.	
P.	TA-21 Cleanup Campaign	In Progress	TA-21 is the sixteenth Campaign priority, which is based upon the implementation of a DOE approved Documented Safety Analysis before work can continue. Resources are being focused on higher priority Campaigns.	B
Q.	Known Cleanup Sites (Above SSLs) Campaign	Completed	Campaign Completed	None

C.2 – Class A Campaigns

Class A Campaigns are Campaigns in which Campaign Completion Dates can be established. Class A Campaigns are listed in Table C.2-1.

Table C.2-1 – Class A Campaigns

	Campaign	Status	Campaign Completion Date ¹	Number of SWMUs/AOCs ²	Total SWMUs/AOCs ³
B.	Supplemental Investigation Reports Campaign ⁴	In Progress	03/30/2026	36	226
C.	Historical Properties Completion Campaign	In Progress	12/28/2029	54	93
D.	Southern External Boundary Campaign	In Progress	01/30/2030	68	74
E.	Pajarito Watershed Campaign	In Progress	09/30/2032	169	178
F.	Sandia Canyon Watershed Campaign	In Progress	11/27/2032	37	70
G.	Upper Water Watershed Campaign	In Progress	02/02/2043	248	273
Total SWMUs/AOCs =				612	914

¹ Campaign Completion Date is based on various assumptions, including prioritization of Campaigns, estimates on funding for future fiscal years, and timely approvals from government agencies on permits/licenses/reports. Assumptions in determining Campaign Completion Dates are provided in Section C.5.

² Number of SWMUs/AOCs includes remaining SWMUs/AOCs that have not received CoCs.

³ Total SWMUs/AOCs includes the sum of SWMUs/AOCs currently and previously associated with the specific Campaign.

⁴ If additional work is required for a SWMU/AOC after NMED review of the CoC, then that SWMU/AOC will be moved under another appropriate Campaign for completion of the work.

C.2.1 – Class A Campaign Descriptions and Five-Year Schedule

“Aggregate Area” means an area within a single watershed or canyon made up of one or more SWMUs or AOCs and the media affected or potentially affected by releases from these SWMUs or AOCs, and for which investigation or remediation, in part or in entirety, is conducted for the area as a whole to address area-wide contamination, ecological risk assessment, and other factors.

B. Supplemental Investigation Reports Campaign – In Progress

This Campaign involves preparing and submitting ten supplemental investigation reports and (where appropriate) submitting CoC requests to NMED. Previous investigations were conducted for ten Aggregate Areas. However, after Investigation Reports for these investigations were submitted to NMED, NMED updated its position on defining nature and extent of contamination. Therefore, the data in these Investigation Reports was reassessed to determine: (1) if nature and extent of contamination for SWMUs and AOCs in the ten Aggregate Areas is defined; and (2) whether each SWMU or AOC poses an unacceptable risk to human health and the environment. (SWMUs/AOCs: 36)

- S-Site Aggregate Area (SWMUs/AOCs: 3)
- Potrillo/Fence Canyons Aggregate Area (SWMUs/AOCs: 7)
- Threemile Canyon Aggregate Area (SWMUs/AOCs: 0)
- TA-49 Inside the Nuclear Environmental Site Boundary (SWMUs/AOCs: 0)
- TA-49 Outside the Nuclear Environmental Site Boundary (SWMUs/AOCs: 0)
- Cañon de Valle Aggregate Area, Technical Area 14 (SWMUs/AOCs: 0)
- North Ancho Canyon Aggregate Area (SWMUs/AOCs: 0)
- Lower Sandia Canyon Aggregate Area (SWMUs/AOCs: 1)
- Upper Cañada del Buey Aggregate Area (SWMUs/AOCs: 0)
- Upper Mortandad Canyon Aggregate Area (SWMUs/AOCs: 23)
- Middle Mortandad/Ten Site Canyons (SWMUs/AOCs: 2)

Activity Description	Finish Date
Supplemental Investigation Report Campaign	
NMED Approval of Certificates of Completion	09/30/2025
Letter Documenting Campaign Completion	03/30/2026

C. Historical Properties Completion Campaign – In Progress

This Campaign involves investigating and remediating three Aggregate Areas in the historical location of the Laboratory. Some SWMUs/AOCs are on, or require access through, property that is not owned by DOE. (SWMUs/AOCs: 54)

- Guaje/Barrancas/Rendija Canyons Aggregate Area (SWMUs/AOCs: 0)
- Pueblo Canyon Aggregate Area (SWMUs/AOCs: 3)
- Upper Los Alamos Canyon Aggregate Area (SWMUs/AOCs: 9)
- Middle Los Alamos Canyon Aggregate Area (SWMUs/AOCs: 42)

Activity Description	Finish Date
Historical Properties Completion Campaign	
Letter Documenting Campaign Completion	12/28/2029
Pueblo Canyon Aggregate Area	
Phase III Investigation Work Plan	09/30/2026
Letter Documenting Work Executed	09/30/2027
Phase III Investigation Report	09/30/2028
Request for Certificates of Completion	04/30/2029
Upper Los Alamos Canyon Aggregate Area	
Phase III Investigation Work Plan	09/30/2026
Letter Documenting Work Executed	09/30/2027
Phase III Investigation Report	09/30/2028
Request for Certificates of Completion	04/29/2029
Middle Los Alamos Canyon Aggregate Area	
NMED Approval of Phase II Investigation Report and Addendum	Pending
Request for Certificates of Completion	Pending

D. Southern External Boundary Campaign – In Progress

This Campaign involves investigating and remediating five Aggregate Areas located in the border area between the Laboratory, Bandelier National Monument, and White Rock. (SWMUs/AOCs: 68)

- Chaquehui Canyon Aggregate Area (SWMUs/AOCs: 43)
- South Ancho Canyon Aggregate Area (SWMUs/AOCs: 11)
- Lower Water/Indio Canyons Aggregate Area (SWMUs/AOCs: 0)
- North Ancho Canyon Aggregate Area (SWMUs/AOCs: 5)
- Potrillo/Fence Canyons Aggregate Area (SWMUs/AOCs: 9)

Activity Description	Finish Date
Southern External Boundary Campaign	
Letter Documenting Campaign Completion	01/30/2030
Chaquehui Canyon Aggregate Area	
Phase III Investigation Report, Rev 1	06/03/2026
Request for Certificates of Completion	02/08/2027
South Ancho Canyon Aggregate Area	
NMED Approval of Investigation Report, Rev 1	Pending
Request for Certificates of Completion	Pending
North Ancho Canyon Aggregate Area	
NMED Approval of Phase II Investigation Report, Rev 1	Pending
Request for Certificates of Completion	Pending
Potrillo/Fence Canyons Aggregate Area	
Letter Documenting Work Executed	09/30/2026
Letter Documenting Work Executed	09/30/2027
Phase II Investigation Report	09/30/2028
Request for Certificates of Completion	07/07/2029

E. Pajarito Watershed Campaign – In Progress

This Campaign involves investigating and remediating four Aggregate Areas in the central portion of the Laboratory. (SWMUs/AOCs: 169)

- Starmer/Upper Pajarito Canyon Aggregate Area (SWMUs/AOCs: 70)
- Twomile Canyon Aggregate Area (SWMUs/AOCs: 59)
- Threemile Canyon Aggregate Area (SWMUs/AOCs: 5)
- Lower Pajarito Canyon Aggregate Area (SWMUs/AOCs: 35)

Activity Description	Finish Date
Pajarito Watershed Campaign	
Letter Documenting Campaign Completion	09/30/2032
Starmer/Upper Pajarito Canyon Aggregate Area	
Investigation Report, Rev 1	07/30/2026
Request for Certificates of Completion	01/25/2027
Investigation Report Addendum for SWMU 08-004(c)	09/30/2027
Request for Certificate of Completion for SWMU 08-004(c)	06/05/2028
Twomile Canyon Aggregate Area	
NMED Approval of Response to Notice of Disapproval on Investigation Report, Rev 1	Pending
Request for Certificates of Completion	Pending
Letter Report Documenting Work Executed	09/30/2026
Investigation Report Addendum	09/30/2027
Request for Certificates of Completion	06/02/2028
Threemile Canyon Aggregate Area	
NMED Approval of Phase II Investigation Report, Rev 1	Pending
Request for Certificates of Completion	Pending
Lower Pajarito Canyon Aggregate Area	
Aggregate Area work is not funded during this planning period.	-

F. Sandia Canyon Watershed Campaign – In Progress

This Campaign involves investigating and remediating five Aggregate Areas in the central portion of the Laboratory. (SWMUs/AOCs: 37)

- Upper Sandia Canyon Aggregate Area (SWMUs/AOCs: 15)
- Lower Sandia Canyon Aggregate Area (SWMUs/AOCs: 4)
- Upper Mortandad Canyon Aggregate Area (SWMUs/AOCs: 7)
- Upper Cañada del Buey Aggregate Area (SWMUs/AOCs: 10)
- Middle Mortandad/Ten Site Canyons Aggregate Area (SWMUs/AOCs: 1)

Activity Description	Finish Date
Sandia Canyon Campaign	
Letter Documenting Campaign Completion	11/27/2032
Upper Sandia Canyon Aggregate Area	
Aggregate Area work is not funded during this planning period.	-
Lower Sandia Canyon Aggregate Area	
Aggregate Area work is not funded during this planning period.	-
Upper Cañada del Buey Canyon Aggregate Area	
Aggregate Area work is not funded during this planning period.	-
Upper Mortandad Canyon Aggregate Area	
Aggregate Area work is not funded during this planning period.	-
Middle Mortandad /Ten Site Canyons Aggregate Area	
Aggregate Area work is not funded during this planning period.	-

G. Upper Water Watershed Campaign – In Progress

This Campaign involves investigating and remediating three Aggregate Areas in the central portion of the Laboratory. (SWMUs/AOCs: 248)

- Cañon de Valle Aggregate Area (SWMUs/AOCs: 113)
- Upper Water Canyon Aggregate Area (SWMUs/AOCs: 126)
- S-Site Aggregate Area (SWMUs/AOCs: 9)

Activity Description	Finish Date
Upper Water Watershed Campaign	
Letter Documenting Campaign Completion	02/03/2043
Cañon de Valle TA-14/15 Aggregate Area	
Aggregate Area work is not funded during this planning period.	-
Cañon de Valle TA-16 Aggregate Area	
Aggregate Area work is not funded during this planning period.	-
Upper Water Canyon Aggregate Area	
Aggregate Area work is not funded during this planning period.	-
S-Site Canyon Aggregate Area	
Aggregate Area work is not funded during this planning period.	-

C.3 – Class B Campaigns

Class B Campaigns are Campaigns in which Campaign Completion Dates cannot yet be established. Class B Campaigns are listed in Table C.3-1.

Table C.3-1 – Class B Campaigns

Class B Campaigns				
	Campaign	Status	Number of SWMUs/AOCs ¹	Total SWMUs/AOCs ²
A.	Hexavalent Chromium Campaign	In Progress	0	0
H.	Royal Demolition Explosives (RDX) Campaign	In Progress	2	2
I.	Material Disposal Area C Remedy Campaign	In Progress	0	1
J.	Material Disposal Area L Remedy Campaign	In Progress	1	1
K.	Material Disposal Area H Remedy Campaign	In Progress	1	1
L.	Material Disposal Area AB Remedy Campaign	In Progress	7	7
M.	Material Disposal Area A Remedy Campaign	In Progress	1	1
N.	Material Disposal Area T Remedy Campaign	In Progress	8	8
O.	Material Disposal Area G Remedy Campaign	In Progress	11	11
P.	TA-21 Cleanup Campaign	In Progress	38	68

Class B Campaigns				
	Campaign	Status	Number of SWMUs/AOCs ¹	Total SWMUs/AOCs ²
	Total SWMUs/AOCs		69	100

¹Number of SWMUs/AOCs includes remaining SWMUs/AOCs that have not received a CoC.

²Total SWMUs/AOCs includes the sum of SWMUs/AOCs currently associated with the specific Campaign.

C.3.2 – Class B Campaign Descriptions

A. Hexavalent Chromium Campaign – In Progress

This Campaign involves a hexavalent chromium groundwater plume. It consists of: (1) installing and operating wells and associated equipment to provide Interim Measures to prevent migration of the hexavalent chromium plume beyond the Laboratory boundary; (2) obtaining data necessary to conduct a Corrective Measures Evaluation; (3) completing a Corrective Measures Evaluation Report; (4) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Plan; (5) implementing the selected remedy; and (6) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. (SWMUs/AOCs: 0)

H. Royal Demolition Explosives (RDX) Campaign – In Progress

This Campaign involves an RDX groundwater plume. It consists of: (1) conducting activities, such as potential Interim Measures or surface activities, to prevent migration of RDX; (2) obtaining data necessary to conduct a Corrective Measures Evaluation; (3) completing a Corrective Measures Evaluation Report; (4) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Plan; (5) implementing the selected remedy; and (6) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. (SWMUs/AOCs: 2)

I. Material Disposal Area C Remedy Campaign – In Progress

MDA C is currently in an administrative proceeding. (SWMUs/AOCs: 0)

J. Material Disposal Area L Remedy Campaign – In Progress

This Campaign involves: (1) completing a Corrective Measures Evaluation Report for Material Disposal Area L; (2) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Plan; (3) implementing the selected remedy; and (4) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. This Campaign will also involve soil-vapor extraction of volatile organic compounds as an Interim Measure while the asphalt cover remains above Material Disposal Area L. (SWMUs/AOCs: 1)

K. Material Disposal Area H Remedy Campaign – In Progress

This Campaign involves: (1) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a

Corrective Measures Implementation Plan; (2) implementing the selected remedy; and (3) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. DOE previously submitted a Corrective Measures Evaluation Report. (SWMUs/AOCs: 1)

L. Material Disposal Area AB Remedy Campaign – In Progress

This Campaign involves: (1) characterizing the shaft areas inside and outside of the Nuclear Environmental Site Boundary at Material Disposal Area AB; (2) completing a Corrective Measures Evaluation Report; (3) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Plan; (4) implementing the selected remedy; and (5) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. (SWMUs/AOCs: 7*)

*Although SWMU 49-004 and AOC 49-002 are not designated as part of Material Disposal Area AB, they have been included under the Material Disposal Area AB Remedy Campaign due to their proximity, historical association, and relevance to the broader investigation at Material Disposal Area AB and TA-49. These sites require full characterization prior to entering the Corrective Measures Evaluation phase to ensure that all potentially impacted areas within and surrounding Material Disposal Area AB are adequately assessed.

M. Material Disposal Area A Remedy Campaign – In Progress

This Campaign involves: (1) obtaining characterization data necessary to conduct a Corrective Measures Evaluation for Material Disposal Area A; (2) completing a Corrective Measures Evaluation Report; (3) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Plan; (4) implementing the selected remedy; and (5) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. (SWMUs/AOCs: 1)

N. Material Disposal Area T Remedy Campaign – In Progress

This Campaign involves: (1) obtaining characterization data necessary to conduct a Corrective Measures Evaluation for Material Disposal Area T; (2) completing a Corrective Measures Evaluation Report; (3) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Plan; (4) implementing the selected remedy; and (5) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. (SWMUs/AOCs: 8)

O. Material Disposal Area G Remedy Campaign – In Progress

This Campaign involves: (1) completing a Corrective Measures Evaluation Report for Material Disposal Area G; (2) following NMED's issuance of a Statement of Basis and selection of a remedy, preparing, submitting, and receiving NMED approval of a Corrective Measures Evaluation Plan; (3) implementing the selected remedy; and (4) preparing, submitting, and receiving NMED approval of a Corrective Measures Implementation Report. (SWMUs/AOCs: 11)

P. TA-21 Cleanup Campaign – In Progress

This Campaign involves investigating and remediating two Aggregate Areas located at TA-21. However, the 6 SWMUs/AOCs (former sumps and industrial waste lines) located in Middle Los Alamos Canyon Aggregate Area will continue to be reported in the administrative record for Delta Prime (DP) Site Aggregate Area. (SWMUs/AOCs: 38)

- DP Site Aggregate Area (SWMUs/AOCs: 32)
- Middle Los Alamos Canyon Aggregate Area (SWMUs/AOCs: 6)

C.4 – Completed Campaigns

The following Campaign has been completed under the Consent Order

Q. Known Cleanup Sites (Above SSLs) Campaign – Completed

This Campaign involved soil removal from six SWMUs where investigations identified hazardous contaminants at concentrations exceeding the target risk levels of 10^{-5} lifetime excess cancer risk for carcinogenic contaminants and a hazard index of 1 for non-carcinogenic contaminants. This Campaign is complete.

C.5 – Assumptions for Appendix C Class A Campaigns

The following assumptions apply to the completion date for Class A Campaigns.

C.5.1 Supplemental Investigation Reports Campaign Assumptions

- NMED shall complete its review of the requests submitted by DOE to NMED for CoCs that are listed in Attached B to the 2024 Settlement Agreement on the 2016 Consent Order within 365 days of the execution of the revised Compliance Order on Consent.
- If the CoC review and approval process dictates additional field investigations, those efforts will be addressed under the applicable Aggregate Area/Campaign.

C.5.2 Historical Properties Completion Campaign, Southern External Boundary Campaign, Pajarito Watershed Campaign, Sandia Canyon Watershed Campaign, and Upper Water Watershed Campaign Assumptions

- State, Federal, and DOE regulations and requirements remain unchanged from those in place and applicable as of August 2025.
- Environmentally sensitive resources, per 10 Code of Federal Regulations 1021, remain unchanged from August 2025, including but not limited to: designation of new species, habitats, or management requirements set forth under the Endangered Species Act.