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EM-LA NEPA Document Manager
U.S. DOE Environmental Management Los Alamos Field Office
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Submitted electronically via: EMLA-NEPA@em.doe.gov with subject line Well SIMR-3 Comment

RE: Regional Groundwater Monitoring Well SIMR-3 and Access Road Improvements Draft Floodplain Assessment

NEPA Document Manager,

The New Mexico Environment Department (NMED) reviewed the Draft Floodplain Assessment for Monitoring Well SIMR-3 & Access Road Improvements. NMED offers the attached comments for consideration of Los Alamos National Laboratory (LANL) to ensure compliance with applicable federal and NMED regulations and standards with the proposed floodplain action for the installation of a new groundwater monitoring well, San Ildefonso Regional Monitoring Well 3, in Mortandad Canyon on Pueblo de San Ildefonso lands near LANL.

Strong intergovernmental coordination is essential to ensure protection of human health and the environment. NMED offers a few areas of potential environmental impacts in the attachment for you to evaluate.

Thank you for providing the opportunity to review the project materials. Please reach out to us with questions or concerns you may have. We ask you to send all questions and comment requests to env.review@env.nm.gov, it helps expedite a timely review of your request.

Sincerely,

Jonas Armstrong, Director
Office of Strategic Initiatives

Attachment (1)

Introduction

The New Mexico Environment Department (NMED) reviewed the Draft Floodplain Assessment for Monitoring Well [San Ildefonso Regional Monitoring Well 3] SIMR-3 & Access Road Improvements. The proposed action includes the construction of a well pad; drilling and installation of a monitoring well; well development; site stabilization and revegetation. Access roads to the project area will also be improved. The primary objective of the proposed action is to increase monitoring capability along the southern boundary of the hexavalent chromium plume. SIMR-3 is being proposed in cooperation with Pueblo de San Ildefonso.

Comments

Comment 1: NMED's supports the proposed project and has collaborated with Los Alamos National Laboratory (LANL) and Pueblo de San Ildefonso on the well location.

The proposed project is in part intended to fulfil NMED's Ground Water Quality Bureau (GWQB) requirements set out in the Notice of Violation issued US DOE EM Los Alamos Field Office and NRB Los Alamos on June 6, 2022. GWQB worked with LANL and the Pueblo de San Ildefonso on the location of SIMR-3 to fill in the data gaps identified in the Notice of Violation.

Comment 2: The document should clarify whether the proposed well pad dimensions reflect the size requirements for a dual screen monitoring well, a single screen monitoring well or a cluster monitoring well design.

According to Figure 2, *Proposed monitoring well SIMR-3 well pad and floodplain*, the proposed well pad dimensions are 120 ft x 200 ft. Although the Pueblo de San Ildefonso has not yet issued a determination on an approved well design, NMED recommends the evaluation demonstrate a conservative approach by evaluating the potential impacts for the well pad installation accommodating the largest possible required well pad size for installation. The drill pad for a set of cluster monitoring wells within the chromium plume area, R-35a and R-35b, measured approximately 350 ft x 100 ft. NMED supports the installation of the regional aquifer monitoring well SIMR-3 on Pueblo de San Ildefonso land to provide characterization data for the hexavalent chromium plume. NMED also supports applying a conservative evaluation of the potential impacts the proposed well pad dimensions may have on the floodplain, with the understanding that the proposed well design has not yet been approved by the Pueblo de San Ildefonso or NMED.

Comment 3: The proposed monitoring well would provide data to protect public health.

NMED's Drinking Water Bureau has a positive opinion on this project. While the proposed monitoring well is not located within one mile of any publicly regulated drinking water source, the data it would gather may lead to a better understanding of the plume boundary and aquifer characteristics. Therefore, this project would reduce the long-term risk to public drinking water.

Comment 4: The document should address proper disposal of any soils impacted by petroleum leaks or spills.

While Section 3.1 adequately describes measures used to prevent equipment spills or leaks and explains that contaminated soils would be containerized and relocated, it should also describe how that waste will be managed. Any soils impacted by petroleum leaks or spills should be characterized for proper

transportation and disposal at a facility permitted to accept such special waste. LANL should clarify if the Section 2.1 plan for placement of drill cuttings not suitable for land application “in accumulation areas appropriate for the type of waste” includes characterization to properly store, transport, and dispose of the waste. While Section 3.2 calls for removal of all trash, debris, and construction materials from the project area, it should specify the disposal of all such materials at a properly permitted disposal facility. Under NMED regulations, any person who generates, stores, processes, transports, or disposes of solid waste shall do so in a manner that does not create a public nuisance.