

**NEW MEXICO ENVIRONMENT DEPARTMENT'S RESPONSE TO PUBLIC COMMENT RECEIVED ON THE
CLASS 2 PERMIT MODIFICATION REQUEST
U. S. DEPARTMENT OF ENERGY/ NATIONAL TECHNOLOGY AND ENGINEERING SOLUTIONS OF SANDIA, LLC
SANDIA NATIONAL LABORATORIES**

Public comment concerning the Class 2 Permit Modification Request, submitted by the U. S. Department of Energy/National Technology & Engineering Solutions of Sandia, LLC (NTESS) Sandia National Laboratories (SNL) Facility was received by the New Mexico Environment Department (NMED) during a 60-day public comment period that extended from March 27, 2023, through May 29, 2023. One comment was received. The table below summarizes the comment and contains the NMED's response.

NMED Response Number	Commenter ID	Summary of Public Comment	NMED Response
R1	Albuquerque Bernalillo County Water Utility Authority	<p>The Water Authority disagrees with the rationale provided in the modification documents that groundwater monitoring well MWL-MW4 is no longer required for monitoring groundwater levels at the MWL. Figures 7-5 and 7-6 in the 2022 Annual report indicate MWL-MW4 is regularly used to determine groundwater elevation and without it, there would be a gap in the groundwater elevation data below the MWL.</p> <p>Given the dynamic nature of the regional aquifer due to anthropogenic influences, it is not unreasonable to expect groundwater flow conditions to change with time. Removing a monitoring well without replacement limits the ability of the Permittee to monitor changing flow conditions in the future. Additionally, MWL-MW4 is currently the deepest monitoring well in the groundwater network and could provide valuable information to ensure the quality of the regional aquifer has not been impacted by the MWL if sampling at it were resumed.</p> <p>The Water Authority understands the Permittee’s concern of MWL-MW4 acting as a potential conduit of hazardous materials to the regional aquifer. The Water Authority requests that two replacement wells be installed to replace MWL-MW4 to continue monitoring and tracking of groundwater flow over time:</p> <ul style="list-style-type: none"> • The first well should be placed at the water table in one of the areas indicated in red in Figure 1 to establish the groundwater elevation below the MWL. • The second well should be placed downgradient of MWL-MW8 in the area indicated in yellow in Figure 1. This well should be screened at the top of the regional aquifer to provide water quality and potentiometric surface information. 	<p>Long-term monitoring and maintenance is required and performed under the Long-Term Monitoring and Maintenance Plan (LTMMP), and will continue indefinitely to ensure protection of human health and the environment.</p> <p>Under the LTMMP, water level measurements and compliance sampling will continue in the compliance wells MWL-BW2, MWL-MW7, MWL-MW8, and MWL-MW9. Additionally, water level measurements continue to be monitored in wells MWL-MW5 and MWL-MW6, located further downgradient from the MWL which also enable the detection of changes in groundwater flow direction should a change occur.</p> <p>Water level measurements have been collected from the compliance well network on a regular basis since their installation in 2007. Additionally, water level measurement data for MWL-MW5 and MWL-MW6 has been collected since 2000. During that time, no significant changes to groundwater flow direction at the MWL have been observed, despite changes to the north in the regional aquifer due to anthropogenic influence.</p> <p>NMED will direct the Permittees to install any wells necessary to ensure protection of human health and the environment under the LTMMP should the groundwater flow direction change in the future.</p> <p>No change was made to the proposed permit modification.</p>