Certified Mail - Return Receipt Requested

February 6, 2024

Tim Davis
Chief Environmental Officer
National Aeronautics and Space Administration
White Sands Test Facility
P.O. Box 20
Las Cruces, NM 88004-0020

Attention of: RE-23-050

RE: DISAPPROVAL
RECONFIGURATION REPORT FOR WELL BW-4
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM08800019434
HWB-NASA-23-005

Dear Mr. Davis:

The New Mexico Environment Department (NMED) has received the National Aeronautics and Space Administration Johnson Space Center White Sands Test Facility (Permittee) *Reconfiguration Report for Well BW-4* (Report), dated March 21, 2023. NMED has completed its review of the Report and hereby issues this Disapproval. The following comments must be addressed.

COMMENTS

1. Section 4.0, Reconfiguration Overview

NMED Comment: The following issues must be addressed:

a. The NMED Approved March 2022 *Well Reconfiguration Work Plan for Well BW-4* proposed the installation of a bladder-pump sampling system at 330 feet below the top of casing at an identified high transmissivity fracture zone, and a reconfigured total well

depth of 340 feet below ground surface (bgs). The well completion information reported on Figure 4.1 Reconfigured BW-4 Well Completion Diagram, indicates a work scope deviation for the final total well depth (reported at 332.65 feet bgs) that must be discussed in the revised Report as this well termination depth only allows for two-feet of borehole below the proposed sampling zone. Additionally, clarify if the final well depth could potentially affect representative groundwater sampling at the monitoring well location. The Permittee is reminded that any deviation from the approved work plan must be discussed in the appropriate sections of the Report.

b. The revised Report must include discussion of well development and the installation of the proposed bladder pump sampling system, including all supporting data and information, and must also include a final well completion diagram.

The Permittee must submit a revised Report that addresses the comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's comments were addressed in the revised Report. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing all changes made to the Report. The revised Report must be submitted to NMED no later than **July 31, 2024.**

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 690-5760.

Sincerely,

Ricardo Maestas

Digitally signed by Ricardo Maestas
Date: 2024.02.06 13:54:40 -07'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
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