June 10, 2026

Ms. Amanda Skarsgard
NASA Environmental Compliance Manager
National Aeronautics and Space Administration
White Sands Test Facility
P.O. Box 20
Las Cruces, New Mexico 88004-020
amanda.g.skarsgard@nasa.gov

Attention of: RE-26-053

RE: DISAPPROVAL
PL-6 WORK PLAN DEVIATION REQUEST
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
JOHNSON SPACE CENTER WHITE SANDS TEST FACILITY
DOÑA ANA COUNTY, NEW MEXICO
EPA ID #NM8800019434
HWB-NASA-22-001

Dear Ms. Skarsgard,

The New Mexico Environment Department (NMED) has received the National Aeronautics and Space Administration Johnson Space Center White Sands Test Facility (Permittee) abandonment approach for well PL-6, as described in the *PL-6 Work Plan Deviation Request (Request)*, dated May 12, 2026 and received May 18, 2026. The *Work Plan for Abandonment of NASA WSTF Well PL-6 and Replacement with Monitoring Well 600C-002-GW*, was approved by NMED on October 31, 2022. NMED has completed its review of the PL-6 Work Plan Deviation request and provided a copy to the Office of the State Engineer (OSE). Based on input from OSE, NMED hereby issues this Disapproval. The following comment must be addressed based on OSE's review.

COMMENT

1. **Basis for PL-6 Well Deviation Request.**

   Permittee Statements: The Permittee states in its Request that a deviation for the abandonment of monitoring well PL-6 is necessary due to the abandonment approach specified in the NMED-approved Work Plan. PL-6 contains a Westbay sampling system installed by Westbay Instruments. The approved Work Plan requires that the system be removed by Westbay representatives using specialized equipment to perforate the inflatable packers and oversee removal of the polyvinyl chloride (PVC) sampling system.

   However, removal by Westbay representatives is no longer feasible because Westbay ceased operations and can no longer provide technical or field support as of April 23, 2026. The proprietary tools needed for Westbay system removal are not commercially available for purchase or rental. Without access to these tools or technical support, the Westbay sampling system in PL-6 cannot be removed by any other means.

Therefore, the Permittee requests approval to abandon the sampling system in place. Consistent with the approved Work Plan, an alternative approach is permitted when system removal is not possible. The Permittee proposes leaving the Westbay casing inside the outer steel casing and placing pressure grout between the 1.5-inch PVC and the 4-inch well casing to the maximum extent practical. PL-6 is located outside the contaminant plume in unconsolidated sediments that are hydraulically connected.

NMED Comment: OSE reviewed NASA-WSTF's request and indicated that, although several of the proposed steps are consistent with their requirements, additional actions are necessary before any plugging activities may proceed. In particular, OSE noted that only plugging the outer stainless-steel casing to the top of the first packer is a concern, because leaving the outer casing open below the first packer could provide a conduit for future contaminant migration if the abandoned packers fail and unanticipated migration of the plume occurs.

OSE further advised NMED that NASA-WSTF must submit a formal plugging plan to the OSE Las Cruces District Office, in accordance with 19.27.4.30(C)(3) NMAC, for review and concurrence prior to initiating any plugging work on well PL-6. OSE also noted that they will contact NASA-WSTF directly regarding these requirements.

Since OSE concurrence is required for well plugging, the Permittee must submit a revised Work Plan that addresses OSE concerns outlined in their correspondence and this Disapproval. Additionally, the Permittee must include a response letter that cross-references where all comments from both agencies are addressed in the Work Plan. An electronic redline-strikeout version of the revised Work Plan showing all changes made to the Work Plan must be submitted along with the revised work plan to NMED no later than **July 30, 2026**.

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

Sincerely,

JohnDavid Nance

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JohnDavid Nance
Chief
Hazardous Waste Bureau

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