National Aeronautics and
Space Administration

Lyndon B. Johnson Space Center
White Sands Test Facility
P.O. Box 20
Las Cruces, NM 88004-0020

July 20, 2026

Reply to Attn of: RE-26-076

Mr. JohnDavid Nance, Bureau Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Subject: Response to Disapproval PL-6 Work Plan Deviation Request

The National Aeronautics and Space Administration (NASA) Johnson Space Center White Sands Test Facility (WSTF) has received the New Mexico Environment Department (NMED) Hazardous Waste Bureau's *Disapproval PL-6 Work Plan Deviation Request* (HWB-NASA-22-001), dated June 10, 2026. NASA appreciates NMED's review of the *PL-6 Work Plan Deviation Request*, dated May 12, 2026, including coordination with the Office of the State Engineer (OSE), and has evaluated the comments provided in the disapproval letter.

As described in the May 12, 2026, *PL-6 Work Plan Deviation Request*, NASA requested approval to modify the abandonment approach for monitoring well PL-6 after Westbay Instruments ceased operations and could no longer provide the specialized equipment and technical support necessary to remove the proprietary Westbay sampling system. NASA therefore proposed abandoning the Westbay sampling system in place by pressure grouting the 1.5-inch PVC system and surrounding 4-inch stainless-steel casing to the uppermost packer.

In the *Disapproval PL-6 Work Plan Deviation Request,* NMED acknowledged that portions of the proposed approach were consistent with the approved Work Plan (*Work Plan for Abandonment of NASA WSTF Well PL-6 and Replacement with Monitoring Well 600C-002-GW*); however, based on OSE's review, the request was disapproved because the proposed method did not fully address concerns regarding the potential for the outer 4-inch steel well casing below the uppermost packer to remain open to the formation. NMED directed NASA to submit a revised Work Plan, a comment response letter, and a formal plugging plan to address comments from OSE and NMED, prior to conducting abandonment activities.

After submitting the *PL-6 Work Plan Deviation Request*, NASA identified a qualified company who has the capabilities to remove the Westbay sampling system in accordance with the abandonment procedures described in the approved Work Plan. The company recently acquired a portion of Westbay Instruments' equipment, including the tools necessary to deflate the PL-6 packers, and they are in contact with a former Westbay technician who is available to provide technical and field support. As a result, NASA proposes to proceed with removal of the Westbay

sampling system and abandonment of monitoring well PL-6 in accordance with the Work Plan. Because the well can be abandoned in accordance with the Work Plan, it is NASA's understanding that an updated work plan and plugging plan are not needed at this time.

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions or comments concerning this submittal, please contact Antonette Doherty at 575-202-5406.

Amanda Skarsgard
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