



Certified Mail - Return Receipt Requested

February 12, 2025

George H. Cushman
Headquarters, Department of the Army
Office of the DCS, G-9
Army Environmental Office, Room 5C140
600 Army Pentagon
Washington, DC 20310-0600

**RE: APPROVAL WITH MODIFICATIONS
LETTER WORK PLAN FOR ABANDONMENT OF WELLS MW23, MW36S, AND MW36D
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-24-018**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Letter Work Plan for Abandonment of Wells MW23, MW36S, and MW36D* (Work Plan), dated December 30, 2024. NMED has reviewed the Work Plan and hereby issues this Approval with Modifications with the following comments.

COMMENTS

1. Well Abandonment Activities, page 3, paragraph 2

Permittee Statement: "Following the removal of surface completion materials, the PVC casing and screen for each well will be sealed by lowering a tremie pipe to the bottom of the well and pumping a cement and bentonite grout mixture. The sealant material will be filled to within 5 feet bgs and allowed to set overnight."

NMED Comment: The casing diameters and depths of wells MW23, MW36S, and MW36D are reported as 2.5, 2.0, and 2.0 inches, and 134, 50, and 75 feet, respectively. NMED is concerned that the casing diameters of the wells are potentially too narrow, and the depths of the wells are potentially too deep to use a tremie method to plug the well casings. The sealant material (i.e., cement and bentonite grout mixture) that is applied from the bottom of the wells may be distorted while pulling out the tremie pipe and voids may potentially occur within the well casings. These voids can act as a conduit for the migration of

contaminants. In the response letter, explain whether or not voids may potentially occur within the well casing while pulling out the tremie pipe. If such voids may potentially occur, the well casings must be removed first and the boreholes must subsequently be abandoned with the tremie method. In this case, include the provision in the Work Plan and provide replacement pages.

2. Reporting, page 3, last paragraph

Permittee Statement: “A well plugging record will be submitted to NMOSE within twenty (20) days after completion of the plugging (Well Plugging Record, Form WD-11).”

NMED Comment: Note that the Work Plan must also be approved by the New Mexico Office of the State Engineer (OSE) before the activities are implemented. If the work plan submitted to the OSE is different from the one submitted to NMED, the Permittee must also provide a copy of the approved OSE well plugging plan to NMED with the well abandonment report (Report). Acknowledge this provision in the response letter.

The Permittee must address all comments in this Approval with Modifications and submit a response letter and replacement pages no later than **March 28, 2025**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Should you have any questions regarding this letter, please contact Michiya Suzuki of my staff at (505) 690-6930.

Sincerely,

JohnDavid Nance
Chief
Hazardous Waste Bureau

cc: N. Dhawan, NMED HWB
M. Suzuki, NMED HWB
L. King, EPA Region 6 (6LCRRC)
S. Begay-Platero, Navajo Nation
A. Kucate, Pueblo of Zuni
M. Bowekaty, Pueblo of Zuni

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D. Hickman, Southwest Region BIA
G. Padilla, Navajo BIA
M. Wischnewski, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.
C. Frischkorn, BRAC
A. Soicher, USACE

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