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GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Hazardous & Radioactive Materials Bureau*  
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**PETER MAGGIORE**  
SECRETARY

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April 12, 1999

Ron Johnson  
Technical Group Leader  
Public Service Company of New Mexico  
Alvarado Square - Mail Stop 0408  
Albuquerque, NM 87158

Subject: Design Report - Person Station Gas Turbine Production Well  
Cobisa-Person Power Company, Inc.  
RCRA Permit No. NMT 360010342

Dear Mr. Johnson:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has reviewed the above-referenced Report, dated January, 1999.

The Report provides design specifications for a proposed new production well (the Well) to provide cooling and fire protection water for a Cobisa-Person Power Company, Inc. (Cobisa) gas turbine electric generator (the Plant) planned for construction this Summer at the Public Service Company of New Mexico's (PNM) Person Generating Station site in Albuquerque (the Site).

PNM is currently carrying out a corrective action program to remediate groundwater contamination at the Site, under the above-referenced RCRA Post-Closure Care Permit (the Permit).

In a letter from Benito Garcia to Ron Johnson, dated December 4, 1998, regarding proposed alternatives for discharge of water from the Well, HRMB requested that PNM submit design

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specifications for the Well prior to installation, so that HRMB can ensure that the Well does not interfere with the corrective action program at the Site. The Report serves as that submittal.

HRMB approves construction of the Well as specified in the Report, with the following conditions.

The groundwater contamination plume with the highest concentrations of contaminants at the Site, and which is being remediated under the corrective action program, is located at approximately 150 feet bgs (the Shallower Aquifer). The Well will be screened at 420 to 490 feet bgs (the Deeper Aquifer). The Shallower and Deeper Aquifers are separated by clay soil layers. In order to provide certainty about whether the clay layers prevent the Well from drawing the Shallower Aquifer contaminants into the Deeper Aquifer, the Shallower Aquifer water elevations will have to be monitored when the Well is in use. In addition, sampling of the water from the Well will be required in order to monitor for evidence of contaminants moving into the Deeper Aquifer.

#### Water Elevation Monitoring

The effect of the Well on the Shallower Aquifer shall be determined by a pump test to monitor the Shallower Aquifer elevations during development of the Well at the time of its installation. Shallower Aquifer elevations will also be monitored on a long-term basis as part of the ongoing groundwater monitoring program at the Site. If Shallower Aquifer elevations indicate that the Well is drawing on the Shallower Aquifer to an unacceptable degree, an alternate source of water for the Plant may be required.

#### Water Quality Monitoring

Two options have been proposed by Cobisa for discharge of water from the Well after it is used in the Plant. One option is discharge under authority of a U.S. Environmental Protection Agency NPDES permit. A second option is discharge of the water into the existing groundwater contaminant treatment stream either at the inlet or outlet point of the existing treatment system, under authority of approved NMED Groundwater Quality Bureau Discharge Plan DP-1006. If the water is discharged under an NPDES permit, sampling requirements can be covered under that permit, if the Hazardous Constituents specified in the RCRA Permit are included in the NPDES permit's sampling requirements. If the water is discharged into the existing treatment system, HRMB will require that samples be taken for Hazardous Constituents specified in the Permit on a quarterly basis, which can be done at the time of groundwater sampling at the Site under the existing groundwater monitoring program. If sample results indicate the Well is drawing contamination into the Deeper Aquifer, an alternate source of water for the Plant may be required.

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If you have any questions please contact Carl Will of my staff at 505-827-1561.

Sincerely,



Robert S. ("Stu") Dinwiddie, Program Manager  
RCRA Permits Management Program  
Hazardous and Radioactive Materials Bureau

cc: Benito J. Garcia, HRMB  
Carl Will, HRMB  
David Neleigh, EPA Region 6  
Baird Swanson, GWQB

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