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InfiMedia Inc.

1717 LOUISIANA BLVD., NE SUITE #209
ALBUQUERQUE, NM 87110
(505) 255-6200
(505) 255-1400 FAX
INFIMEDIA@INFIMEDIA-INC.COM

FAX

TO: Steve Pullen
FROM: Jim Bonner
DATE: 24 Aug

RE:

Steve,

My fax did not print out a confirmation of my earlier transmission. Did you get it?

August 24, 2001

Steve Pullen
NMED
Santa Fe, NM

Steve,

This letter will address the manner in which the alluvial material adjacent to the landfill is handled during Phase 1A of operations and the resulting impact on the monitoring of this unit. Also included are proposed locations of 'western boundary' alluvial monitoring. This report, in conjunction with the letter to you, dated August 23, 2001 should fully address the four issues we discussed in Roswell on July 19, 2001.

1. Alluvium adjacent to the landfill - When the sides of the upper portion of the landfill are lined, the alluvium will be removed for a lateral distance of 16 feet from the side of the landfill. This material will be replaced with clay - resulting in a "clay plug" that will remain in place during operations and closure. This plug is intended to prevent potential fluids in the alluvium from entering the landfill and to keep leachate in the landfill from migrating out to the environment.

However, during Phase 1A (current draft permit) only the north slope of the landfill will be lined to the crest. The alluvial material adjacent to the landfill on this slope will still be stripped away for a distance of 16 feet and the clay plug will be placed. On the remaining slopes that are not lined to the crest, the alluvial materials will be removed, but the clay and liner materials will not be placed. Instead, a small drainage ditch will be constructed on the top of the Upper Dockum sediments to control any potential fluid movement from the alluvium.

Under these operating conditions, monitoring wells on the periphery of the landfill in the alluvial material would provide absolutely no information. There will be no waste activities in the landfill adjacent to this unit And more importantly, the unit will be entirely exposed and any contained fluids would be caught in the drainage ditch. We propose that the two monitoring wells originally scheduled for development adjacent to the landfill be included in the fence of 'western boundary' wells as discussed below.

2. Western boundary monitoring wells - Gandy Marley, Inc. is committed to installing a fence of four monitoring wells in the alluvial sediments west of the operating area. This is a direct response to comments expressed at the recent public meetings. The purpose of this fence of monitoring wells is to ensure that the Triassic Park Disposal Facility is protective of any water in the alluvium and will have no impact on the existing wells currently producing from these sediments five miles west of the facility.

Presented below are two options for the location of these monitoring wells.

- **Option 1** - As we have discussed, Figure 1 shows a fence of monitoring wells along the western property boundary. These wells are positioned at 500-foot intervals along the boundary. They are west of and topographically below all Phase 1A operational areas, including the Stormwater Detention Basin.

  Although this is the location we had discussed in the past, it is <u>not</u> our preferred location for the following reasons.

  1) As described above, the alluvial sediments will be stripped away from the sides of the landfill and completely exposed during this phase. There will be no waste activities in the upper portion of the landfill and alluvial sediments will have no contact with hazardous materials.
  2) We have been stating in public meetings that we are installing monitor wells adjacent (within hundreds of feet) to operational facilities so that any excursion could be recognized early and dealt with before it reaches the site boundary.
  3) This proposed fence of monitoring wells is topographically below the Stormwater Detention Basin. This feature is designed to collect uncontaminated water from storm events and direct this water away from the operational area. In this case, it would direct this water into the area of shallow monitoring wells. It is very likely that fluid may be seen in these dry wells after the water from a storm event is diverted into these alluvial sediments. This fluid would have nothing to do with the landfill operations, but would certainly cause an interruption in activities.

- **Option 2** - Our preferred location is shown in Figure 2. Instead of locating the fence of wells along the western property boundary, they would be located along the western boundary of the operations area. These wells would be spaced at approximately 330-foot intervals along this fence. This accomplishes the original purpose for a fence of monitoring wells, but in a more efficient manner.

  Our rationale for this includes:

  1) These wells would be within hundreds of feet of the western operational units - Evaporation Ponds, Truck Wash Unit and Maintenance Shop. In the unlikely event of an excursion, these locations allow Gandy Marley a quicker response time.
  2) For the reasons mentioned above, there is no need to have a monitor well adjacent to the Phase 1A landfill. No monitoring well would give the amount of information that will already be available from stripping away and exposing an entire unit.
  3) These monitoring wells would be placed to monitor operational facilities, not the Stormwater Detention Basin and avoid unnecessary complications.

Please let me know what you think of the two options. As soon as we can agree, I will write it up as a comment response and submit it into the hearing process.

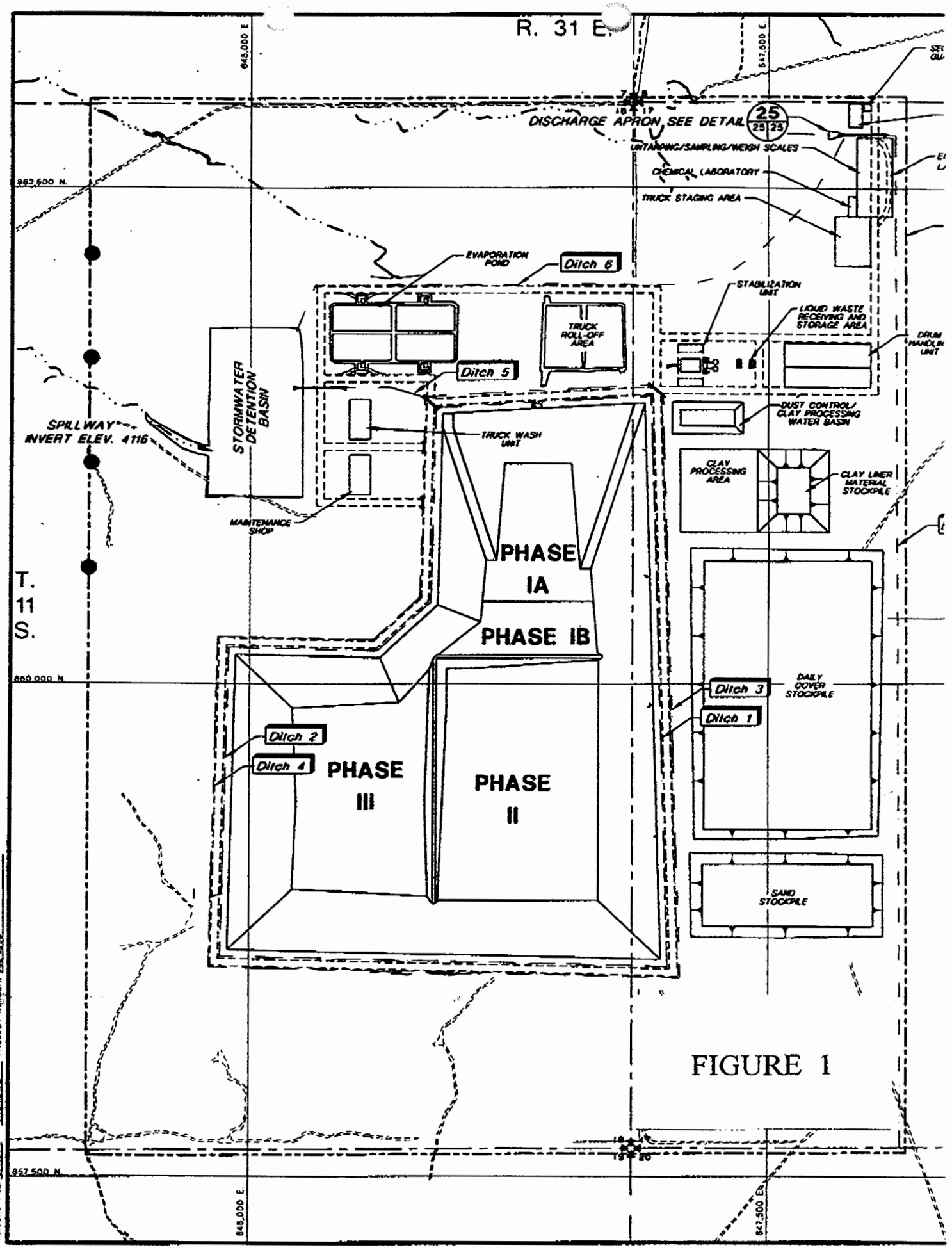
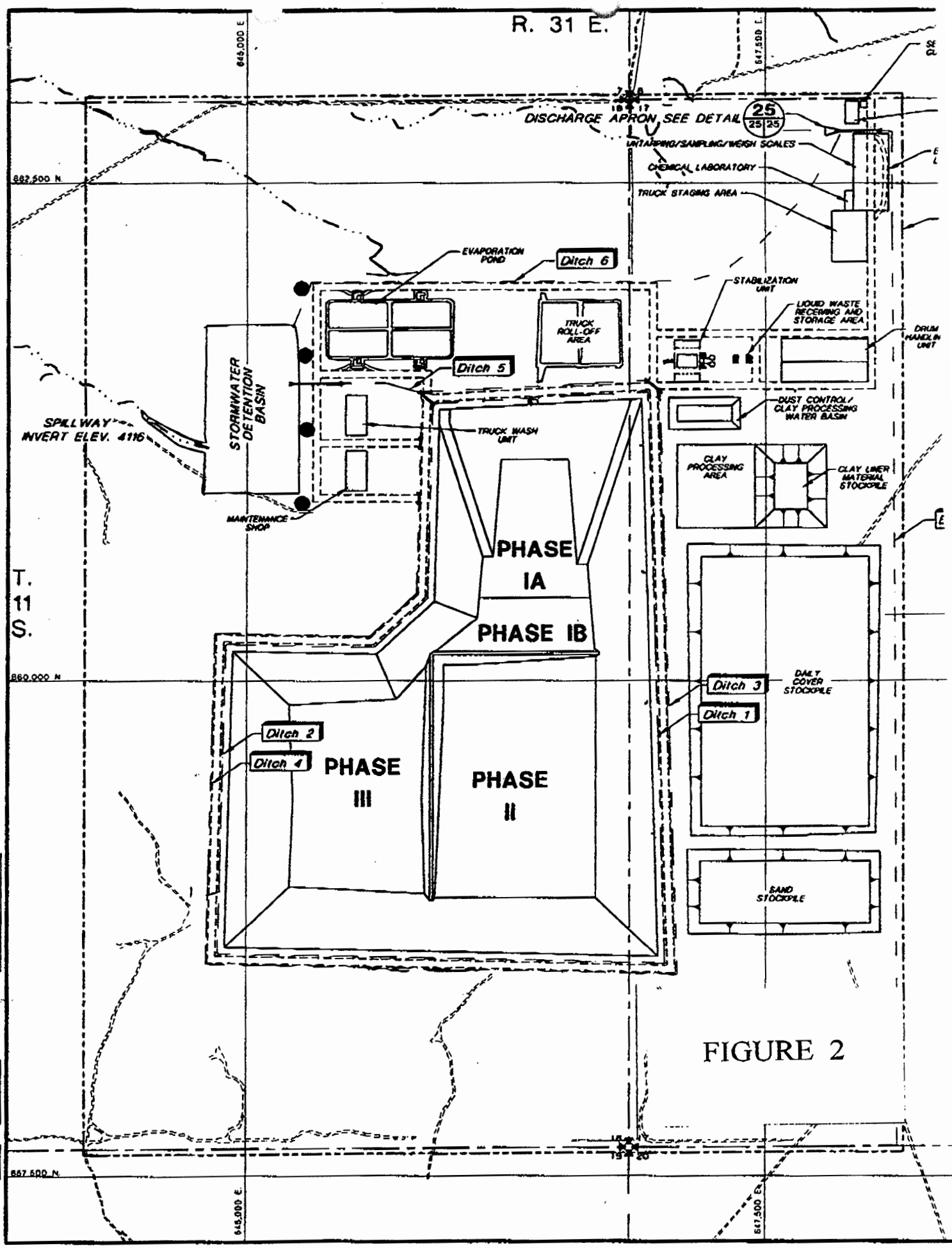

R. 31 E.
T. 11 S.
DISCHARGE APRON, SEE DETAIL 25
UNLOADING/SAMPLING/WEIGH SCALES
CHEMICAL LABORATORY
TRUCK STAGING AREA
EVAPORATION POND
Ditch 6
STABILIZATION UNIT
LIQUID WASTE RECEIVING AND STORAGE AREA
TRUCK ROLL-OFF AREA
Ditch 5
STORMWATER DETENTION BASIN
SPILLWAY INVERT ELEV. 4116
DUST CONTROL/ CLAY PROCESSING WATER BASIN
TRUCK WASH UNIT
CLAY PROCESSING AREA
CLAY LINER MATERIAL STOCKPILE
MAINTENANCE SHOP
PHASE IA
PHASE IB
Ditch 3
DAILY COVER STOCKPILE
Ditch 1
Ditch 2
Ditch 4
PHASE III
PHASE II
SAND STOCKPILE
862,500 N.
860,000 N.
857,500 N.
845,000 E.
847,500 E.

FIGURE 1


R. 31 E.
645,000 E.
647,500 E.
DISCHARGE APRON, SEE DETAIL
25
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UNLOADING/SAMPLING/WEIGH SCALES
CHEMICAL LABORATORY
TRUCK STAGING AREA
662,500 N.
EVAPORATION POND
Ditch 6
STABILIZATION UNIT
LIQUID WASTE RECEIVING AND STORAGE AREA
TRUCK ROLL-OFF AREA
DRUM HANDLING UNIT
Ditch 5
STORMWATER DETENTION BASIN
SPILLWAY INVERT ELEV. 4116
TRUCK WASH UNIT
DUST CONTROL/ CLAY PROCESSING WATER BASIN
CLAY PROCESSING AREA
CLAY LINER MATERIAL STOCKPILE
MAINTENANCE SHOP
T. 11 S.
PHASE IA
PHASE IB
660,000 N.
Ditch 3
DAILY COVER STOCKPILE
Ditch 1
Ditch 2
Ditch 4
PHASE III
PHASE II
SAND STOCKPILE
657,500 N.
645,000 E.
647,500 E.

FIGURE 2