



DEPARTMENT OF THE ARMY  
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9  
600 ARMY PENTAGON  
WASHINGTON, DC 20310-0600

March 29, 2024

Base Realignment and Closure Operations Branch

Mr. Ricardo Maestas  
Chief, Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

RE: Response No. 1 to Disapproval, 2024 Interim Northern Area Groundwater Monitoring Plan, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974, HWB-FWDA-24-001

Dear Mr. Maestas:

This letter provides the Army's Response No. 1 to the comments issued in the Notice of Disapproval (NOD) letter from the New Mexico Environment Department (NMED) on the 2024 Interim Northern Area Groundwater Monitoring Plan, Fort Wingate Depot Activity (FWDA), McKinley County, New Mexico, EPA ID# NM6213820974, HWB-FWDA-24-001, dated March 19, 2024. Response No. 1 provides an update on the groundwater sampling event currently being mobilized for April 2024. In light of the NMED disapproval of the 2024 Interim Groundwater Monitoring Plan, the Army is proceeding with monitoring under the *Final 2022 Interim Northern Area Groundwater Monitoring Plan, Revision 2*, approved by NMED letter HWB-FWDA-20-004 dated August 3, 2021. However, the Army is incorporating the analytical changes authorized by NMED in the March 19, 2024, letter. Specifically, the Army is updating the analyte list for specific wells as directed/approved by NMED. The attached table indicates the analytical changes for specific wells and identifies the comment number in the NMED March 19, 2024, letter based on the revision.

As required in NMED's March 19, 2024, letter, the Army will submit the revised 2024 Interim Northern Area Groundwater Monitoring Plan, addressing all comments contained in the letter no later than April 30, 2024. The full Army response will include a Response No. 2 letter to address each NMED comment.

If you have questions or require further information, please contact me at [George.h.cushman.civ@army.mil](mailto:George.h.cushman.civ@army.mil), 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile) or [Cheryl.a.frischkorn.civ@army.mil](mailto:Cheryl.a.frischkorn.civ@army.mil), 703-624-6429 (Mobile).

Sincerely,

*George H. Cushman IV*

George H. Cushman IV  
BRAC Environmental Coordinator  
Fort Wingate Depot Activity  
BRAC Operations Branch  
Environmental Division

Enclosures

CF:

Neelam Dhawan, NMED, HWB  
Ben Wear, NMED, HWB  
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Timothy Trimble, The Zuni Tribe  
Admin Record, NM / Ohio

**April 2024 – Sampling Matrix**  
 Updated based on NMED March 19, 2024 letter

Well ID	TCL VOC	TPH GRO	Total Explosives	Herbicides	Major Anions	TAL Total Metals	TAL Dissolved Metals	Perchlorate	TCL SVOC	TCL Pesticides	TPH DRO	PCB	Notes
Northern Area Monitoring Wells - Alluvial													
BGMW01	x		x		x	x	x	x	x	x			
BGMW02	x		x		x	x	x	x	x	x			
BGMW03	x		x		x	x	x	x	x	x			
BGMW11	x	x	x	x	x	x	x	x	x	x	x	x	
BGMW12	x	x	x	x	x	x	x	x	x	x	x	x	
BGMW13D	x	x	x	x	x	x	x	x	x	x	x	x	
BGMW13S	x	x	x	x	x	x	x	x	x	X	x	x	Comment 25: Add pesticides
FW31	x		x		x	x	x		x	x			
FW35	x		x		x	x	x		x				
MW01	x	x	x		x	x	x	x		x	x		
MW02	x	x	x		x	x	x	x		x	x		
MW03	x	x	x		x	x	x	x			x		
MW18D	x	x	x		x	x	x	x			x		
MW18S	x					x	x						
MW20	x	x	x		x	x	x	x	x	x	x		
MW22S	x	x	x		x	x	x	x	x	x	x		
MW22D	x	x	x		x	x	x	x	x	x	x		
MW23	x		x		x	x	x	x	x	x			
MW24	x		x		x	x	x	x	x	x			
MW25	x	x	x	x	x	x	x	x	x	x	x	x	
MW26	x	x	x	x	x	x	x	x	x	x	x	x	
MW27	x	x	x	x	x	x	x	x	x	x	x	x	
MW28	x	x	x	x	x	x	x	x	x	x	x	x	
MW29	x	x	x	x	x	x	x	x	x	x	x	x	
MW30	x	x	x	x	x	x	x	x	x	x	x	x	
MW31	x	x	x	x	x	x	x	x	x	x	x	x	
MW32	x	x	x	x	x	x	x	x	x	x	x	x	
MW33	x	x	x	x	x	x	x	x	x	x	x	x	
MW34	x	x	x	x	x	x	x	x	x	x	x	x	
MW35	x	x	x	x	x	x	x	x	x	x	x	x	
MW36D	x	x	x	x	x	x	x	x	x	x	x	x	
MW36S	x	x	x	x	x	x	x	x	x	X	x	x	Comment 25: Add pesticides
MW37	x	x	x	x	x	x	x	x	x	x	x	x	
MW38	x	x	x	x	x	x	x	x	x	x	x	x	
MW39	x	x	x	x	x	x	x	x	x	x	x	x	
SMW01	x		x		x	x	x	x	x				
TMW01	x		x		x	x	x	x	x				
TMW02	x		x		x	x	x	x	x				
TMW03	x		x		x	x	x	x	x				
TMW04	x		x		x	x	x	x	x				
TMW06	x	x	x		x	x	x		x		x		
TMW07	x	x	x		x	x	x		x		x		
TMW08	x	x			x	x	x	x	x	x	x		

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TMW10	x	x	x		x	x	x	x			x		
TMW11	x		x		x	x	x	x					
TMW13	x				x	x	x	x					
TMW15	x		○		x	x	x	x	○				Comment 40
TMW21	x	x	x		x	x	x	x			x		
TMW22	x		x		x	x	x	○	○				Comment 42
TMW23	x		x		x	x	x	x	x	x			
TMW24	x		x		x	x	x	x		x			
TMW25	x		x		x	x	x						
TMW26	x		x		x	x	x	x					
TMW27	x					x	x	x					
TMW28	x				x	x	x						
TMW29	x		x		x	x	x	x					
TMW31S	x		x		x	x	x	x	x	x			
TMW33	x	x			x	x	x		x		x		
TMW34	x	x			x	x	x	x	x		x		
TMW35	x	x			x	x	x	x	x	○	x		Comment 46
TMW39S	x		x		x	x	x	x	x	○			Comment 47
TMW40S	x		x	x	x	x	x	x	x	X			Comment 25: Add pesticides
TMW41	x		x		x	x	x	x	x	x			
TMW43	x		x		x	x	x	x	x	x			
TMW44	x		x		x	x	x	x	x	○			Comment 48
TMW45	x		x		x	x	x	○	x	○			Comment 49
TMW46	x	x	○		x	x	x	x	x	○	x		Comment 50
TMW47	x		x		x	x	x	x	x	○			Comment 51
TMW54	x	x	x	x	x	x	x	x	x	x	x	x	
TMW56	x	x	x	x	x	x	x	x	x	x	x	x	
TMW57	x	x	x	x	x	x	x	x	x	x	x	x	
TMW59	x	x	x	x	x	x	x	x	x	x	x	x	
TMW60	x	x	x	x	x	x	x	x	x	x	x	x	
TMW61	x	x	x	x	x	x	x	x	x	x	x	x	
TMW62	x	x	x	x	x	x	x	x	x	x	x	x	

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Well ID	TCL VOC	TPH GRO	Total Explosives	Herbicides	Major Anions	TAL Total Metals	TAL Dissolved Metals	Perchlorate	TCL SVOC	TCL Pesticides	TPH DRO	PCB	Notes
<b>Northern Area Monitoring Wells - Bedrock</b>													
BGMW07	x		x	x	x	x	x	x	x	x		x	
BGMW08	<i>Do not purge or sample</i>												Comment 6: Halt purging & sampling
BGMW09	x		x	x	x	x	x	x	x	x		x	
BGMW10	x		x	x	x	x	x	x	x	x		x	
TMW14A	x		○		○	x	x	X	x				Comment 54
TMW16	x		○			x	x	○	x				Comment 55
TMW17	x				x	x	x	x					
TMW18	x		x		x	x	x	x	x				
TMW19	x		x			x	x	x	x				
TMW30	x		x		x	x	x	x	x	x			
TMW31D	x		x		x	x	x	x	○	○			Comment 57
TMW32	x		x		x	x	x	x	○	○			Comment 57
TMW36	x		x		x	x	x	x	○	○			Comment 58
TMW37	x		○		x	x	x	x	○	○			Comment 59
TMW38	x		x		x	x	x	x	x	x			
TMW39D	x		x		x	x	x	x	○	○			Comment 60
TMW40D	x		x		x	x	x	x	○	○			Comment 60
TMW48	x		x		x	x	x	x	○	○			Comment 60
TMW49	x		x		x	x	x	x	x	x			
TMW50	x	x	x	x	x	x	x	x	x	x	x	x	
TMW51	x	x	x	x	x	x	x	x	x	x	x	x	
TMW52	x	x	x	x	x	x	x	x	x	X	x	x	Comment 25: Add pesticides
TMW53	x	x	x	x	x	x	x	x	x	x	x	x	
TMW55	x	x	x	x	x	x	x	x	x	x	x	x	
TMW58	x	x	x	x	x	x	x	x	x	x	x	x	
TMW63	x	x	x	x	x	x	x	x	x	x	x	x	
TMW64	x	x	x	x	x	x	x	x	x	x	x	x	

**LEGEND:**

x = Sample is analyzed for the specified method, as described in the 2022 Interim Groundwater Monitoring Plan.

X = Analysis added based on NMED March 19, 2024 letter.

○ = Analysis removed based on NMED March 19, 2024 letter.

**ABBREVIATIONS and ACRONYMS:**

DRO = diesel range organics

GRO = gasoline range organics

ID = identification

SVOC = semivolatle organic compound

PCB = polychlorinated biphenyl

TAL = total analyte list

TCL = target compound list

TPH = total petroleum hydrocarbons

VOC = volatile organic compound