



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

July 18, 2023

Army Environmental Division- BRAC Operations Branch

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

SUBJECT: Safety Concerns/ Additional Extension Request for the Parcel 3 Well Replacement Installation, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974

Dear Mr. Maestas:

The purpose of this letter is to provide an update on the status of the groundwater monitoring well installation at Parcel 3 and to request an additional extension for completing the remaining fieldwork and submitting the final report, from August 30, 2023, and October 10, 2023, respectively, to November 30, 2024, and January 31, 2025. Well installations at Parcel 3 are being conducted under *Final Revision 1, Parcel 3 Groundwater Background Wells and Replacement Monitoring Wells Installation Work Plan* approved with modifications by New Mexico Environment Department (NMED) in letter HWB-FWDA-19-005, dated November 20, 2020.

Background monitoring wells BGMW14 and BGMW16 and replacement wells CMW43 and CMW45 have been installed. To date, three extensions have been requested to complete the well installations, during which the Army has continued searching for opportunities to complete the groundwater monitoring well replacements at Parcel 3. Unfortunately, large quantities of munitions debris and munitions of explosive concern (MEC) continue to be discovered during ongoing munitions response actions at Parcel 3.

The Army must prioritize the munitions response actions as the MEC continues to be an imminent threat to the health and safety of site workers, including the staff standing by to install wells and perform groundwater sampling. Ongoing munitions excavation and removal activities are also being performed as a source removal action for chemicals of potential concern. The Army continues to expand the excavations and perform demilitarization and disposal activities for MEC utilizing remote-controlled excavation equipment, as safety protocols restrict even highly trained munitions response staff from working in the safety arc radius of the MEC excavations.

Replacement monitoring wells CMW37 through CMW42, CMW44, CMW46, and CMW47 are either within the explosive safety arcs of active excavation or demilitarization activities or within soil testing/staging and drainage areas. The safety of field staff would be jeopardized by placing them within the explosive safety arcs. In addition, wells located in areas that have been cleared of MEC but still need final earth grading activities are in jeopardy of damage and/or destruction by heavy equipment. This includes the area where the drainage channel was diverted as

necessary to complete the MEC removal activities. The groundwater in the vicinity of several replacement wells is strongly controlled by inflow from the surface drainage, and proceeding with well installation while the surface flows are diverted will not allow for accurate well depths and screen placements in the replacement wells. Subsurface alluvial conditions are likely to be dry in the short term, which is not representative of conditions as they will be once the drainage patterns in these areas are restored.

Munitions response activities are currently scheduled at Parcel 3 through the summer of 2024. Subsequent to summer 2024 MEC removal activities, site restoration, including re-grading, revegetation, and the restoration of drainage patterns will be completed.

The Army proposes the resumption of Parcel 3 well installation efforts in August and September 2024, followed by well development and initiation of groundwater monitoring pending NMED approval of the Parcel 3 Groundwater RCRA Facility Investigation Supplemental Sampling Work Plan (submitted April 2023).

The Army is seeking an extension in time under RCRA Permit Section I.M., in order to complete the field work and associated report until January 2025.

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

Sincerely,

*George H. Cushman IV*

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

cc:

Dave Cobrain, NMED, HWB  
Ben Wear NMED, HWB  
Michiya Suzuki, NMED, HWB  
Dale Thrush, U.S. EPA Region 6  
Laurie King, U.S. EPA Region 6  
Ian Thomas, BRAC OPS  
Alan Soicher, USACE  
Alvin Whitehair, SW BIA  
George Padilla, BIA, NRO  
Wenona Wilson, BIA  
Sharlene Begay-Platero, Navajo Nation  
Timothy Trimble, Zuni Tribe  
Admin Record, OH / NM