
Subject:

FW: NERT Unit 4 and 5 Buildings Investigation, First Mobilization Tech Memo -
Response to Comments

From: Weiquan Dong [<mailto:wdong@ndep.nv.gov>]

Sent: Tuesday, June 28, 2016 3:16 PM

To: Jay A. Steinberg, President (trustee.president@lepetomaneinc.com) <trustee.president@lepetomaneinc.com>

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Subject: RE: NERT Unit 4 and 5 Buildings Investigation, First Mobilization Tech Memo - Response to Comments

Dear Mr. Steinberg,

The NDEP and EPA have received and reviewed the Trust's above-identified Deliverable-- Response to Comments on NERT Unit 4 and 5 Buildings Investigation, First Mobilization Tech Memo and find that the document is acceptable with the following comments noted for the Administrative Record:

NERT's RTC to Unit Buildings 4 and 5, First Mobilization

EPA and NDEP have concerns over the proposed telescoping well construction. The EPA and NDEP both agree that protection of the lower aquifer is very important, therefore;

- 1) we want to see the seal construction materials are placed via tremie pipe. Many drillers are reluctant to place these lower seals with via tremie pipe because of the seal material bridging or plugging up the tremie pipe. One solution to that issue is to chase the seal material with a bag of filter sand.
- 2) After the seal material is in-place and allowed to set up for a designated time period, the casing should be positioned into the seal, there is no feel with the casing to the final position as the seal is still too soft. Give the seal some more time to setup.
- 3) Then we would like the newly constructed lower seal to be tested. A negative pressure test would be performed by lowering the water level in the casing by 10 or 20 feet over the water level outside the casing, cover the well with a plate and allow it to rest overnight or up to 24 hours if schedule will allow.

If the heads are still as expected upon reentry then drilling inside the set casing with next smaller size drill string could continue. If the seal has failed and the water level in the casing is now high, the seal needs to be reset.

This would be repeated at each lower seal in the telescope set, and it allows for strong confidence in the seals at each junction of a telescoping well to be considered competent. This will slow down the speed of constructing a well and add to the overall cost of a well but this knowledge goes toward the objective of not carrying down contaminated materials.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-486-2850 x252.

Sincerely,



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