

JAMES OYSTER

I support the Agency Initiated Modification (AIM) to the WIPP Permit that the NMED has submitted.

The Department of Energy (DOE) has not fulfilled its agreements to prioritize the removal to WIPP of legacy waste at LANL. DOE has shown that it will not do so without guidance and pressure from NMED.

DOE stores the legacy waste at LANL in drums in tents at Area G—on a mesa in a known wildfire zone. Should one fire reach the tents at Area G, a severe disaster—one from which New Mexico could not recover—would be the result. In the last 50 years three wildfires have burned onto LANL property: the La Mesa fire (in 1977), the Cerro Grande fire (in 2000), and the Las Conchas fire (in 2011). Two more fires—the Dome fire (in 1996) and the Cerro Pelado fire (in 2022)—have burned to within a few miles of LANL property.

The modifications give DOE clear, concise, step-by-step instructions for how to fulfill its obligations. They allow NMED to measure and track DOE's progress. They also set a penalty should DOE fail to deliver on its mission.

James Oyster