

Email to: **Madai.Corral@state.nm.us**
Subject Line: **HWB 21-02 WIPP SHAFT COMMENT**

Ms. Madai Corral, Hearing Clerk
New Mexico Environment Department (NMED)

Dear Ms. Corral:

I join with many other people to object to the Waste Isolation Pilot Plant (WIPP) expansion and to the New Shaft. Please deny the New Shaft draft permit modification.

The New Shaft is an integral part of the Department of Energy's (DOE's) expansion plan for WIPP. That plan violates existing volume and time limits for WIPP set in federal law, state agreements, the WIPP Permit, and DOE's decades-old social contract with New Mexicans.

DOE has not presented the entire WIPP expansion plan to the public and to New Mexico officials. Instead, DOE is providing only a single piece of the plan – the New Shaft – saying that other pieces of the plan will be presented in the future. I object to DOE's piecemeal and illegal approach. I object to NMED's refusal to explain the true purpose of the shaft in their required notification documents for the public. In order to provide informed public comments, the public must be able to review DOE's entire plan.

I know that in 2020 the National Academy of Sciences reported that, "An incremental approach inhibits a comprehensive review by regulators and public of the full impact of the proposed ... program on a future WIPP."

I also know that in the same year it was the Government Accountability Office – not DOE or NMED – that properly labeled the new shaft as a "utility shaft" and provided the public with the design of DOE's plan to more than double the number of underground waste disposal panels.

DOE's claim that the new shaft is needed solely for underground ventilation is a false narrative to distract NMED and the public away from the WIPP expansion. Since it opened in 1999, WIPP has been operating with the existing four shafts. A New Filter Building will be completed far before the New Utility Shaft will be finished, and that New Filter Building will provide more underground ventilation than WIPP has ever had before. As a result, an additional shaft to be used solely for ventilation, would be redundant. In reality, the New Utility Shaft is an integral part of DOE's expansion plans. These expansion plans must be a part of the public hearing as without them the hearing is defective.

Again, there is no need for a new ventilation shaft. Please deny the draft permit.

Sincerely,

(Your **Name**, **Address** and **Date**)