

FENNEMORE CRAIG, P.C.

2394 East Camelback Road, Suite 600
Phoenix, Arizona 85016-3429
(602) 916-5000

Scott K. Ames

Direct Phone: (602) 916-5339
Direct Fax: (602) 916-5539
sames@fclaw.com

Law Offices

Denver (303) 291-3200
Las Vegas (702) 692-8000
Nogales (520) 281-3480
Phoenix (602) 916-5000
Reno (775) 788-2200
Tucson (520) 879-6800

July 21, 2014

Arizona Department of Environmental Quality
ATTN: Danielle Taber
ADEQ Project Manager
1110 West Washington Street
Phoenix, AZ 85054

Re: Comments on the Roosevelt Irrigation District's ("RID") "Operation and Maintenance Plan"

Dear Danielle:

RID submitted an Operation & Maintenance Plan ("O&M Plan"), Revision 3, dated October 2013, to the Arizona Department of Environmental Quality ("ADEQ"). In its O&M Plan, RID references the four wells that it is treating as part of its Modified Early Response Action Work Plan that was conditionally approved by ADEQ on February 1, 2013. Those four wells – RID-89, RID-92, RID-95 and RID-114 – are drilled to different depths, have different pumping capacities and, because of their respective locations, treat groundwater of varying contaminant concentrations. Moreover, RID has installed different size and capacity wellhead treatment facilities on each of those wells that must therefore be monitored and maintained individually.

As a result of these pronounced differences, it is more logical to consider these four wellhead treatments as four separate treatment facilities requiring four separate O&M Plans.

Sincerely,

FENNEMORE CRAIG, P.C.



Scott K. Ames

SAME/tmm

cc: Anthony E. Young, Esq. – Arizona Attorney General
Laura L. Malone - ADEQ