



May 9, 2011

Ms. Julie Riemenschneider  
Manager, Remedial Projects Section  
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY  
1110 West Washington Street  
Phoenix, Arizona 85007

Re: **Well Investigation Work Plans  
Roosevelt Irrigation District Early Response Action**

Dear Ms. Riemenschneider:

On behalf of the Roosevelt Irrigation District (RID), I am submitting this letter to withdraw from further consideration by the Arizona Department of Environmental Quality (ADEQ) the *Well Investigation Work Plan* that was prepared by Montgomery & Associates and submitted to ADEQ on August 9, 2010. The RID wishes to retract this Work Plan to reflect the fact that RID and ADEQ have jointly agreed to conduct a first phase of well investigation work in accordance with an *Abridged Task 2 Well Investigation Work Plan* submitted by RID to ADEQ on November 24, 2010. The Abridged Work Plan was approved by ADEQ in your letter dated December 16, 2010 (reissued on February 9, 2011 with clarification). Our intent in retracting the August 9, 2010 Work Plan is to set aside the discourse raised by ADEQ comments and RID responses regarding the necessary scope of work. By focusing on completion of the first phase of work in the Abridged Work Plan, RID can obtain critical data to characterize conditions in a subset of RID extraction wells and use this information to evaluate requirements for any further work, if needed.

As part of the Abridged Work Plan, RID completed well rehabilitation and detailed testing of RID-95 earlier this year. Results of this investigation were presented to ADEQ in a meeting on April 28, 2011 and the data and findings will be submitted to ADEQ in a Technical Memorandum. As previously discussed with ADEQ, the well investigation work has been discontinued until such time that RID completes drilling and development of a new replacement well at the RID-111 site. Completion of a replacement well for RID-111 is necessary to enable RID to continue with ADEQ's requested well investigation work during RID's peak seasonal demand without damage to its customers and to avoid delays in implementation of the RID Early Response Action. Once the new RID-111 well is installed, RID will continue the well testing program requested by ADEQ in your December 16, 2010 approval letter.

The installation of a replacement well for RID-111 provides an opportunity to characterize groundwater conditions in a newly constructed well. Consequently, with this letter RID is requesting ADEQ approval to conduct detailed well investigations and testing at well RID-111, rather than well RID-114 as specified in the Abridged Work Plan. The rationale for this change is that the new well will provide more reliable and representative



data to characterize groundwater conditions and avoid the inherent complicating factors associated with well investigations of an older well such as RID-114. We believe well testing at RID-111 will reasonably represent hydrologic conditions at RID-114 since both wells are shallow completions (e.g. expected depths of 425 feet or less) and in the same general vicinity of the West Van Buren Area WQARF Site. Additionally, the well investigation work at new well RID-111 can be conducted on an earlier schedule, following RID-111 well construction.

Please contact me with any questions or comments.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Dennis H. Shirley", written in a cursive style.

Dennis H. Shirley, PG  
SYNERGY Environmental, LLC

cc: Amanda Stone, Arizona Department of Environmental Quality  
Stan Ashby, Roosevelt Irrigation District  
David P. Kimball, Esq., Gallagher & Kennedy  
Tim Leo, Montgomery & Associates