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October 28, 2010

Via U.S. Mail and Electronic Mail

Mr. Henry Darwin
Deputy Director
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
1110 West Washington Street
Phoenix, Arizona 85007

Re: **Response to ADEQ Comments on the Roosevelt Irrigation District
Early Response Action "Well Investigation Work Plan"**

Dear Mr. Darwin:

On behalf of the Roosevelt Irrigation District (RID), Gallagher & Kennedy is submitting this response to comments received from the Arizona Department of Environmental Quality (ADEQ) on RID's August 9, 2010, Well Investigation Work Plan (Task 2 Work Plan) associated with the RID Early Response Action (ERA) that was approved by ADEQ on June 24, 2010 for the RID wells in the West Van Buren Area (WVBA) WQARF Site. The comments contained in ADEQ's October 8, 2010 letter, were further clarified during our meeting on October 18, 2010. During this meeting, RID agreed to provide immediate written responses to the ADEQ comments in order to continue the expedited implementation of the ERA, as directed by ADEQ.

RID appreciates ADEQ's expressed support and approval, as reconfirmed in our October 18 meeting of the substantive elements of the ERA to pump 20,000 gallons per minute (gpm) of groundwater from the most highly-contaminated RID wells in the WVBA to a central treatment facility to remove volatile organic compounds (VOCs). We also appreciate ADEQ's understanding of the need to conduct investigative work in a manner that minimizes the impact on RID's operations. RID is willing to cooperate fully to conduct the investigative work relevant to implementing the ERA. In addition, RID is willing to consider other work contemplated by ADEQ to better characterize the WVBA groundwater conditions for evaluation and selection of the final groundwater remedy as part of the future feasibility study (FS). RID will seek and expects to recover all costs incurred to investigate and remediate contamination that impacts or threatens to impact RID's wells and water supply from the potentially responsible parties (PRPs) that are liable for the contamination and RID's costs.

In October 2009, RID entered into an agreement with ADEQ to conduct the ERA as a water supply and well restoration initiative; however, consistent with applicable state law, RID

cannot accept any substantial reduction in production capacity that could limit its capability to meet customer demands. At the same time, RID recognizes ADEQ's interest in maximizing the benefit of pumping and treating contaminated groundwater in the WVBA Site. It is for this reason that RID is willing to conduct focused well investigations that could enhance the ERA from a regional groundwater management perspective.

RID will revise the Task 2 Work Plan to address most of ADEQ's comments. Many of RID's proposed revisions to the Task 2 Work Plan were conceptually discussed with ADEQ at our recent meeting on October 18, 2010. However, consistent with RID's commitment to ADEQ to propose well investigatory work that would address many of ADEQ's comments and that can be reasonably implemented this winter when the RID wells are available, RID will propose to revise the Task 2 Work Plan to include a new overarching initiative to conduct an integrated analysis of the effects of the ERA on groundwater conditions, including modeling and regional groundwater elevation monitoring and analyses. Below are notable changes from the August 9, 2010 draft of the Task 2 Work Plan:

- RID will conduct video logging of 10 wells instead of 13 wells, schedule permitting. RID has decided to eliminate video logging of RID-105, RID-109, and RID-110 since these wells will only tie-in to the ERA on a short-term basis until they are diverted to the RID Main Canal. The need for specific well investigation and final disposition of RID wells 105, 109, and 110 will be addressed by RID in the FS process.
- RID will focus the detailed well investigations on RID-89, RID-95, and RID-106, the three deepest RID wells included in the ERA. As will be explained in our revised Task 2 Work Plan, RID's analysis indicates these three wells offer the most potential to enhance the ERA by sealing off unimpacted aquifer zones and avoiding pumping better quality groundwater from the Lower Alluvial Unit (LAU). RID believes it makes sense from a plume containment and regional groundwater management point-of-view to focus groundwater extraction of the ERA in the Upper and Middle Alluvial Units (UAU/MAU) and to restrict pumping from the LAU, as much as possible. To avoid potential damage to RID's water supply customers, the Task 2 Work Plan field activities need to commence by no later than early December in order to complete the well investigations by February.
- RID will conduct a preliminary modeling study to project changes in groundwater levels and quality under the ERA pumping regimen compared to the current RID pumping regimen. Review of the Draft ADEQ Remedial Investigation Report and preliminary analyses conducted to date indicate that the projected changes in groundwater conditions will be localized and are not likely to adversely affect groundwater levels and quality within the WVBA.
- With ADEQ's permission, RID will conduct area-wide groundwater monitoring to acquire continuous water level data from a network of ERA extraction wells and WVBA monitor wells. This data will enable characterization of measured water level changes that occur when the RID wells resume pumping in the spring. This program will also include two additional activities: 1) water level measurement during the proposed well testing in the three

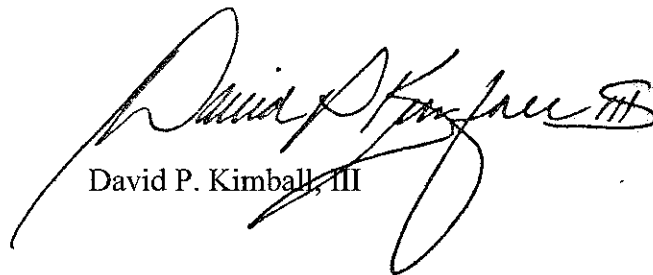
deep LAU wells, and 2) short-term aquifer tests in other RID wells completed in the UAU and MAU. The wells used for short-term aquifer tests will be selected in coordination with ADEQ. The water level data will be used to estimate aquifer parameters for subsequent groundwater modeling by RID during the FS.

For the well investigations set forth in the Task 2 Work Plan or for any subsequent work, RID must ensure that any intrusive well testing will not damage RID's wells, pose unnecessary risk to RID's wells, impede RID's ability to provide critical water supply, or unnecessarily delay the implementation of the ERA. To minimize the potential impact to RID's operations from well investigations required by the Task 2 Work Plan, the RID Board of Directors is considering constructing a replacement well for RID-111, which is currently out-of-service. The new well, if authorized by the RID Board, will provide a source of water supply during the implementation of the work plans and to mitigate potential damages in the event that unanticipated problems arise during the well investigation work that might cause prolonged downtime of existing wells. The water supply provided by this new well will also enable the well investigation work to proceed during high demand periods (if needed) and offset any reduced water supply due to well modifications as a result of the well investigations.

RID is willing to consider other well investigation work, including additional phases of detailed well investigation and aquifer testing, as long as this work does not pose unacceptable risks to RID's wells or impacts to RID's water supply. RID believes subsequent phases of investigation may be appropriate during the FS process, and the scope of work should be established in the Feasibility Study Work Plan.

Though more specific comments will follow next week, we respectfully request that RID's conceptual revision of the Task 2 Work Plan, as described above, be reviewed quickly by ADEQ and any comments regarding these revisions be provided to RID so that RID can implement appropriate changes and submit the Revised Task 2 Work Plan in a manner that will expedite ADEQ's approval and provide RID with the greatest potential to conduct some or all of these well investigations this winter.

Very truly yours,



David P. Kimball, III

Cc: Stan Ashby, Roosevelt Irrigation District
Dennis H. Shirley, PG, Synergy Environmental