GALLAGHER & KENNEDY
P.A.
ATTORNEYS AT LAW

DAVID P. KIMBALL, III
DIRECT DIAL: (602) 530-8221
E-MAIL: DPK@GKNET.COM

2575 EAST CAMELBACK ROAD
PHOENIX, ARIZONA 85016-9225
PHONE: (602) 530-8000
FAX: (602) 530-8500
WWW.GKNET.COM

November 15, 2010

VIA ELECTRIC AND U.S. MAIL

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

Re: **Detailed 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 letter to provide responses to the general and specific comments provided by the Arizona Department of Environmental Quality (ADEQ) on RID's Well Investigation Work Plan (Task 2 Work Plan) dated August 9, 2010. The attached "response to comments" follows the conceptual approach to revision of the Task 2 Work Plan that was previously proposed in my letter to you dated October 28, 2010.

As discussed with ADEQ, the scope of the well investigation work and the potential impact this may have on RID operations is a key concern to RID. We have consistently indicated RID's willingness to cooperate fully to conduct the investigative work relevant to implementing the Early Response Action (ERA), but at the same time we believe further discussion is needed to clarify what work is necessary. In addition, RID has an obligation to ensure that the work conducted will not pose any unacceptable risk to RID wells, impede RID's ability to provide critical water supply, or disrupt water operations.

Given the need to more carefully and critically define the scope of the Task 2 Work Plan and recognizing the schedule constraints we face to finalize the Work Plan and get any work underway during the next two-month period of off-peak water demands, RID proposes the following actions to enable work to proceed:

1. RID will abridge and resubmit the Task 2 Work Plan to define a scaled-back testing program that can reasonably be accomplished in December and January. The abridged Work Plan will be limited to procedures for video logging and detailed well

investigations that are included in Section 4 of the current draft Task 2 Work Plan, including revisions to address relevant ADEQ comments on this section. The intent of this action is to develop and document the methodology for data collection in very straight-forward and specific "standard operating procedures" associated with the well investigation work so that this work may progress. RID will target submittal of the abridged Task 2 Work Plan by November 24th.

2. Upon ADEQ approval of the abridged Task 2 Work Plan, RID will procure contractor services and conduct a limited well investigation program that is expected to include detailed investigation of deep wells RID-89 or RID-95 and video logging of at least 2 of the shallow RID wells included in the ERA. The schedule for field work will be coordinated to ensure ADEQ technical staff are available for all well logging and sampling. Additional well testing may be conducted as time allows and until RID water demands preclude further work. Following testing, RID will equip the ERA wells with access tubes and install pressure transducers to obtain continuous water level data.

3. RID will immediately initiate efforts to procure a contractor and submit a notice to Arizona Department of Water Resources to drill a replacement well for RID-111. The RID Board of Directors has authorized and prioritized the work to replace RID-111 to enable RID's timely performance of ADEQ's Task 2 conditions so as not to unduly delay and/or jeopardize implementation of the approved ERA. As noted in our October 28, 2010 letter to you, the new well will enable the well testing to proceed during high water demand periods, provide a water supply should any unanticipated problems occur during well investigation work, and offset any reduced water supply due to well modifications as a result of the well investigations. For planning purposes, well drilling and installation are targeted for spring 2011.

4. RID will continue discussions with ADEQ to clarify and reach agreement on the remaining scope of work needed for the Task 2 Well Investigation. Practically speaking, RID suggests deferring any determination regarding the scope of the full testing program until RID and ADEQ have an opportunity to review the results of well investigation work conducted in step #2 and the schedule for drilling and installation of the RID-111 replacement well is better known. Following these discussions, RID will revise the Work Plan to document the remaining scope of work and resubmit for ADEQ approval.

5. RID will conduct the remaining well investigation work following completion of the RID-111 replacement well and upon ADEQ approval of the Revised Task 2 Work Plan. An updated schedule of planned well investigation work will be submitted following ADEQ approval of the Revised Task 2 Work Plan and at least 2 weeks prior to resumption of well testing activities.

We appreciate ADEQ's consideration of the RID comments on the well investigation work and respectfully request your concurrence to proceed with the approach outlined in this

letter so that the work may get underway. Please contact me with any questions or comments you may have.

Very truly yours,

David P. Kimball, III

Cc: Amanda Stone, Arizona Department of Environmental Quality
Julie Reimenschneider, Arizona Department of Environmental Quality
Stan Ashby, Roosevelt Irrigation District
Dennis H. Shirley, PG, Synergy Environmental

RESPONSE TO ADEQ COMMENTS
ON TASK 2 WELL INVESTIGATION WORK PLAN

RID responses to ADEQ "general comments" and "specific comments" on the August 9, 2010, Task 2 Well Investigation Work Plan are provided consistent with the numerical listing set forth in ADEQ's October 8, 2010, letter. The ADEQ comments are shown in italics followed by the RID responses to these comments:

General Comments:

1. *The work plan needs to specify the objectives of the investigation activities to be conducted. It then needs to detail what decision criteria will be evaluated to determine if the objectives have been met.*

The Revised Task 2 Work Plan will specify the following objectives and tactical goals of the well investigation work:

Objective #1: Document the existing construction and structural integrity of RID wells that will be integrated into final implementation of the Early Response Action (ERA).

RID will conduct video logging of all wells associated with Phase 2 of the ERA (the 10 most highly-contaminated RID wells) to document the existing well construction and down-hole conditions. The well video logs will be used by RID to evaluate well structural integrity and the need for, type, and timing of potential well modification and/or rehabilitation to improve long-term reliability of the wells for use in the ERA.

Objective #2: Characterize vertical distribution of groundwater flow and VOC concentrations in deep ERA extraction wells that penetrate the Lower Alluvial Unit (LAU) to determine if modification of any well(s) is(are) warranted to enhance regional groundwater management and maximize the benefit of the ERA.

RID will conduct fluid movement investigations and obtain depth-specific water quality samples to determine the vertical distribution of groundwater flow and differences in water quality in deep RID wells that are completed across the Upper and Middle Alluvial Units (UAU and MAU) and into the LAU. The fluid movement investigations will be used by RID to determine the quantity and quality of LAU groundwater entering deep wells, when pumping, and the extent to which it may be possible to isolate flow into the well from deep, "clean" screened intervals. For the purposes of this investigation, "clean" refers to groundwater uncontaminated by VOCs.

Objective #3: Analyze how ERA Work Plan implementation will affect hydraulic capture of groundwater contaminant plumes and groundwater elevations within the WVBA compared to what would be expected with the current pumping conditions.

RID will conduct a preliminary modeling study to evaluate how the changes in the ERA pumping regimen will affect groundwater quality and water levels within the WVBA. RID will use a groundwater flow model to project changes in hydraulic capture of regional contaminant plumes and groundwater levels that result from implementation of the ERA, compared to that occurring with current pumping conditions.

2. *At a minimum, a full explanation of what RID means by "project funding" is necessary. If RID does not have the funding for the ERA, then the ERA should be withdrawn.*

RID believes the term "project funding" is self-explanatory; however, RID will remove references to project funding since this is not a technical issue.

RID takes strong exception to the unfounded and mistaken supposition stated in this comment. Contrary to this assertion, conditional requirement #4 of the Agreement to Conduct Work, dated October 8, 2009, between ADEQ and RID expressly states: "The RID shall prepare and submit Work Plans detailing the Work (defined to include the ERA and Feasibility Study [FS]) to be conducted. Once submitted and approved by ADEQ and when adequate funds are available from potentially responsible parties or cost recovery actions, the Work Plans shall become an enforceable part of this Agreement."

3. *Although there will be no net change in annual groundwater pumping volumes by RID in the WVB Site, ADEQ is concerned that cones of depression will adversely affect existing wells and plume migration. Therefore, the groundwater system needs to be better understood so that the impact of extended pumpage of each RID well can be anticipated.*

RID is implementing the ERA to mitigate the impact of widespread groundwater contamination on a portion of the RID wells and water supply in the WVBA and to prevent the impact of additional RID wells. Although this is primarily intended as an RID water supply restoration initiative, RID will prioritize well use and pumping of the ERA wells to enhance control, management, and cleanup of WVBA groundwater contamination. The current seasonal pumping regimen employed by RID will be modified for the ERA to pump the most highly-contaminated wells in the center of the plume that convey water to the treatment facility as continuously as possible and, where feasible, to reduce pumping of RID wells on the periphery of the plume.

RID believes that sufficient understanding of the hydrogeologic conceptual model of the WVBA was developed during ADEQ's remedial investigation to assert with reasonable confidence that the ERA will enhance plume capture and VOC mass removal without significant adverse impact to regional groundwater levels or quality in the WVBA and nearby WQARF/Superfund sites. However, to address ADEQ's stated concern as suggested in ADEQ's June 24, 2010 ERA-approval letter, RID will conduct modeling as part of an integrated approach to well investigations, to demonstrate that the proposed changes in pumping in the ERA will not adversely affect groundwater levels or quality within the WVBA beyond what would be expected with the current pumping conditions. The methodology for conducting a comparative

modeling evaluation will be specified in the Revised Task 2 Work Plan and is briefly summarized below.

Montgomery & Associates will utilize the "Central Phoenix Plume Model" (CPPM) that was developed during the late 1990s by Roy F. Weston, Inc. for ADEQ. The final CPPM developed by Weston for ADEQ was a 5-layer transient groundwater model that was calibrated and validated to seasonal pumping and groundwater flow conditions in the model study area during the period 1972 through 1998. Montgomery & Associates obtained the CPPM from ADEQ, updated portions of the model to incorporate data available through 2007, and conducted preliminary work with the model to confirm the model executes properly. The updated CPPM will be used to simulate the current RID pumping regimen and the proposed ERA pumping regimen to project the net hydrogeologic effect of the proposed pumping changes in the ERA.

Also, as part of an overarching initiative to document the effects of the ERA on groundwater conditions, RID will conduct area-wide monitoring of groundwater elevations using a network of ERA extraction wells and, with ADEQ's permission, WVBA monitor wells. These data will enable characterization of 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 during the FS.

4. *ADEQ understands the need to conduct well investigations in a phased approach to minimize impact on RID operations and maximize efficiency. ADEQ does not agree with investigating only four wells. ADEQ required in the conditional approval that all RID wells chosen for Phase I of the ERA be fully investigated. This includes fluid movement investigations and depth specific sampling. After this full investigation of Phase 1 wells is completed, RID can propose options for Phase II wells.*

Contrary to ADEQ's statements, neither "all" nor "Phase I" are cited in ADEQ's June 24, 2010 approval of the ERA. However, RID is willing to fully cooperate with well investigations necessary to characterize the impact of WVBA Site groundwater contamination on RID wells and water supply as long as the well investigation activities will not harm or pose undue risk to RID wells, impede RID's ability to provide critical water supply, or unnecessarily delay implementation of the ERA. Further, as acknowledged by ADEQ, any well investigation work will need to be staged in such a way to minimize the impact on RID operations, which presently limits RID's ability to take wells out of service for well testing during the high-demand period which typically runs from early February through mid October. The current need to schedule work in coordination with RID's operations will be a limiting factor in any plan to conduct well investigations.

Therefore, a critical aspect that needs to be clarified at this juncture is to determine what work is <u>needed</u> to implement the ERA and what work can be deferred for subsequent conduct during the remedial action. RID believes a focused well investigation is appropriate, at least for the ERA,

and the focus should be on determining the current conditions of ERA wells and any future modifications needed to enhance well structural integrity. Although not needed for the ERA, RID would agree to seal off deeper screened LAU intervals that may produce substantial volumes of uncontaminated groundwater in response to recommendations from other stakeholders.

RID will conduct video logging of all wells associated with Phase 2 of the ERA (the 10 most highly-contaminated RID wells) to evaluate current well conditions and structural integrity. RID will focus the detailed well investigations on RID-89, RID-95, and RID-106, the three deepest RID wells included in the ERA. RID's analysis, which will be presented in the Revised Task 2 Work Plan, indicates that these three wells offer the most potential to improve the ERA by sealing off unimpacted aquifer zones to avoid pumping better quality groundwater from the LAU and reducing vertical flow gradients that may induce downward contaminant migration.

RID believes that additional work intended to better understand the groundwater system, as referenced in the preceding ADEQ comment, can be conducted during the FS process that will be used to propose and select the final groundwater remedy for the WVBA Site. RID has entered into an agreement with ADEQ to prepare a FS for the WVBA Site and, as part of this effort, is willing to conduct subsequent phases of well investigation consistent with the principles stated above.

5. *If there will be modifications to the techniques or number/types of tests to be performed on the RID wells, then the work plan needs to spell out the modifications expected and the criteria that the modifications will be based on.*

RID expects the data collection activities associated with the well investigation work to be straightforward and follow the specified procedures in the Work Plan. The only significant variable may be the determination of sampling depths for depth-specific samples. Additional specificity regarding selection of depth-specific samples is provided in the response to ADEQ Specific Comment #13.

6. *The work plan states that field activities etc. will be conducted according to ADEQ protocol presented in ADEQ plans. This is fine for tasks that are presented in the ADEQ documents but other tasks which are not contained in the ADEQ documents need to be fully documented in RID documents submitted to and approved by ADEQ. Any planned deviations from methods and procedures presented in the ADEQ documents need to be identified and fully explained. No field activities should be conducted until these documents are approved by ADEQ.*

Comment noted. RID will revise the Task 2 Work Plan accordingly.

Specific Comments:

1. *Section 3.4, second paragraph, second sentence - The work plan states that "The contaminated groundwater in the WVBA site impairs RID's wells, its operations, and restricts the use of this water supply." Please be more specific in how wells, operations, and use have been impaired to date.*

The groundwater contamination in the WVBA has impaired the RID wells and operations by degrading the quality of the water extracted from these wells. The widespread groundwater contamination in the WVBA prevents RID from excercising its legal right to pump uncontaminated groundwater for any and all uses. In order to minimize the amount of contamination extracted from the RID wells (and released to the local environment), RID has reduced the usage of RID wells within the plume, thereby restricting (impairing) their operational flexibility. The VOC contamination present, which exceeds drinking water standards in at least 16 RID wells, also renders this water supply unusable for higher beneficial end-use such as source water for municipal use, without treatment.

2. *Section 4.0: - A higher level of specific technical detail for each of the tasks and how the data would be used needs to be included in this section.*

Comment noted. RID will revise the Task 2 Work Plan accordingly.

3. *Section 4.0, fourth paragraph, first sentence: - The work plan states that test equipment will access zones below the pumps. What about zones above the pumps? All of the proposed tests should also be performed on well zones that are above the pumps including depth specific sampling.*

To maximize the interval below the pump during testing operations, the pump will be set as shallow as feasible. A pipe will be installed from land surface to below the pump to provide access for logging and sampling tools. The upper section of the access pipe must not have perforations to allow calibration of the spinner logging tool. A small section of the access pipe may be perforated above the pump.

All tests proposed can and will be conducted above the pump, but some tests rarely provide useful results within this depth interval. Groundwater quality in the access pipe above the pump may be representative; therefore, depth-specific samples, fluid resistivity logs, and temperature logs will be obtained and analyzed. Groundwater flow conditions inside the access pipe above the pump are generally not representative of average flow conditions in that interval; therefore, spinner logging is generaly not useful above the pump. The logging tools must pass through the interval above the pump to access the interval below the pump; therefore, spinner logging data will be conducted above the pump, but these data will likely not be analyzed quantitatively.

4. *Section 4.0, last paragraph, last sentence: - ADEQ requests a minimum of two weeks notice prior to initiation of field activities.*

Comment noted. RID will revise the Task 2 Work Plan accordingly.

5. *Section 4.1, last sentence - Scheduling of work needs to be planned so that well investigations are completed within a time frame where minimal hydrogeological variation occurs within the system (i.e., within one season). This will allow the extrapolation of data to other seasons if seasonal variation in the aquifer system is understood.*

It is not necessary to conduct all testing within one season to provide valid and useable data for evaluation of flow conditions in wells. The hydrologic system in the WVBA has been operating under similar seasonal hydraulic stresses for many years. Variations in the percent of total flow entering a well from different vertical zones are not expected to vary substantially in different pumping seasons. Further evaluation of this issue can be included in the FS, if of interest to ADEQ or other stakeholders.

A generalized schedule will be provided in the Revised Work Plan; however, the schedule will be subject to change depending on RID's water demands. ADEQ will be notified 2 weeks prior to start of testing operations.

6. *Section 4.2, fourth paragraph - Please give details of a monitoring program in this work plan. ADEQ should not have to refer to a "future" report/work plan.*

This comment is presumed to refer to the 5th paragraph of Section 4.0 in which it was stated that RID would conduct monitoring activities pursuant to a Groundwater Monitoring and Data Management Program (GMDMP) proposed by RID in a separate work plan. This statement was included in the Task 2 Work Plan based on discussions with ADEQ on July 22, 2010, which led RID to believe that ADEQ would support development of the GMDMP. Since there is no such integrated groundwater monitoring program for the WVBA Site, this paragraph will be removed from the Revised Task 2 Work Plan.

7. *Section 4.3, fifth sentence - Please state when video surveys will occur. ADEQ cannot guess when impacts will be minimized or it will be feasible to conduct video surveys for RID. ADEQ requires that all wells to be used in the ERA be video logged. Wells which need to be repaired/cleaned should be video logged again after completion of the repairs/cleaning.*

A schedule for RID well video surveys will be developed following the contractor procurement process defined in Task 2 and explained in Section 4.2 of the Task 2 Work Plan. RID will submit a proposed schedule of planned video surveys and other field activities within 30 days following ADEQ approval of the Revised Task 2 Work Plan and prior to mobilizing any

contractors to conduct work. As a general rule, RID will obtain a well video log after completion of any well repairs or rehabilitation.

To clarify the scope of the video survey task in the Revised Task 2 Work Plan, RID is proposing to only conduct video logging of the 10 RID wells associated with final implementation of the ERA. These wells have the highest VOC concentrations within the RID wellfield and are identified as "Phase 2" in Table 1 of the Task 2 Work Plan. RID does not believe video logging of RID-105, RID-109, and RID-110 (from "Phase 1" of the ERA) is appropriate at this time, given the potential that exists for well damage associated with the test program and since these wells will only tie-in to the ERA on a short-term basis. The need for well investigations and the final disposition of RID-105, RID-109, and RID-110 will be addressed by RID in the FS process.

8. *Section 4.4.1, first paragraph, second sentence: - This sentence states that flow rates of portable pumps installed into the RID wells for the well investigation will be similar to the normal pumping rate. This does not seem likely because of the high volume of groundwater normally pumped by the designated pumping equipment. Please indicate what type of portable pump is expected to be used to accomplish similar pumping rates.*

Line-shaft turbine test pumps will be used for fluid-movement investigations. Line-shaft turbine pumps are presently installed as permanent equipment in all RID wells. Test pumps to be used will be selected during the contractor bidding process. The principal factor that could limit the pumping rate during fluid-movement investigations is the diameter of the well casing. However, preliminary evaluations indicate that test pumps having a diameter that would allow an access pipe to be installed below the pump are available that can yield the same or similar rates to the existing pumping rates for the three RID wells proposed for fluid-movement investigations. No changes to the Work Plan are required pursuant to this ADEQ comment.

9. *Section 4.4.1, first paragraph, fourth sentence: - This sentence states that the portable submersible pump will be set to the minimum depth required for testing. How will this minimum depth be determined?*

The test pump will be set to provide a minimum submergence below the normal pumping water level; this will maximize the portion of the well where fluid movement investigatgions can be conducted below the pump. The minimum submergence required is generally determined by the net positive suction head required to prevent cavitation of the pump. This explanation will be added to the Revised Work Plan.

10. *Section 4.4.1, second paragraph: - This paragraph is confusing. Is the work plan stating that the purpose of three days of pumping using the test equipment prior to fluid-movement investigations to attempt to recreate regular pumping conditions within the aquifer prior to conducting the fluid-movement investigations? How was three days of pumping determined to be the appropriate amount of pumping? Will other types of testing such as aquifer testing be conducted during the three days of pumping? Aquifer*

testing at each of the RID wells proposed for remediation are (SIC) needed for the collection of viable data to be used during the modeling phase of the ERA. The best time for conducting aquifer testing may be after the completion of well testing and modifications. Details on how the aquifer testing will be performed needs to be included in the work plan as a separate section.

Aquifer testing will be conducted during purging and pumping operations for fluid-movement investigations at the three deep wells completed into the LAU. A duration of 3 days of pumping was selected to provide a reasonable and cost-effective amount of time to purge the well prior to conduct of fluid-movement investigations. In combination with results of fluid-movement investigations, these test data will enable estimates of aquifer properties that can be used in modeling during the FS process. If groundwater flow to a well is substantially reduced by any well modifications, additional testing may be conducted following well modification operations. The Work Plan will be revised accordingly.

Following video logging, RID will equip all ERA wells with pressure transducers, where feasible, to obtain continuous water level data. This will enable RID to conduct short-term aquifer tests for ERA wells completed in the UAU and MAU. Wells to be tested will be selected in consultation with ADEQ. In conjunction and with ADEQ's permission, RID will set transducers in key WVBA monitoring wells to better characterize responses to pumping of the ERA wells, laterally and vertically. The water level data will be used to refine aquifer parameters for subsequent groundwater modeling.

11. *Section 4.4.2: - What precautions/efforts prior to sampling will be used to minimize the effects of mixing of well fluids by geophysical equipment while being raised and lowered within the well?*

For fluid-movement under pumping conditions, mixing resulting from movement of the logging and sampling tools is not of concern. Groundwater will be flowing rapidly toward the pump as it passes the geophysical tools. Under non-pumping conditions, mixing cannot be avoided, and no attempts will be made to avoid mixing. However, the order of the investigations: temperature log; conductivity log; spinner flow meter; depth-specific sampling; and caliper log (if not conducted in combination with one of the other geophysical logs) will minimize the potential impact of mixing. Spinner logging under non-pumping conditions will identify the magnitude of any existing vertical flow in the well to aid in interpretation of flow profiles.

12. *Section 4.4.2: - Is the order of tests presented in Section 4.4.2 the order that the tests will be performed in the RID wells?*

Yes. See response to Specific Comment #11.

13. *Section 4.4.2, third sentence - Although the exact sampling depths can not be determined prior to collection of data, currently available data such as lithology and well*

construction can be used to determine target sampling depths. As data are collected, specific depths for sampling can be adjusted/added. ADEQ requests that the data be presented to ADEQ for consultation prior to the collection of samples at the adjusted depths.

This comment is presumed to refer to the fourth sentence of Section 4.4.2. We agree with the comment and will modify the Revised Task 2 Work Plan to indicate that all currently available lithologic and well construction data will be used to determine target sampling depths. RID will consult with ADEQ prior to the testing operation to confirm the target sampling depths and will, at a minimum, collect depth-specific samples at inferred contacts of major hydrostratigraphic units. In the field, additional depth-specific samples will be selected at depths where substantial flow into or out of the well are inferred based on results of the temperature, fluid resistivity, and spinner logging data. ADEQ is welcome to observe the testing operations, and RID will confer with ADEQ, if present, regarding interpretation of the field data obtained from fluid flow and geophysical logs for final determination of depth-specific sample target depths and selection of any additional depth-specific samples, to the extent that this does not unduly delay the execution of the sampling.

14. *Section 5.0: - Will there be any other well modifications considered beside the one well modification presented in this section? Could modifications include the cleaning of clogged well screen, reinforcement of weak well casing, etc.? A work flow should be presented on how the evaluation will be performed to address expected well conditions and the process that will be undertaken to complete the well modifications. The work plan also needs to identify how the modifications will be inspected/tested to determine if the modifications were successful.*

The Work Plan will be modified to include more detail regarding the evaluation criteria and well modification processes to be implemented. For example, if the integrity of the well casing is determined to be problematic, a casing liner may be installed to protect the well. In addition, if results of fluid-movement investigations indicate that the LAU is contributing substantial volumes of uncontaminated groundwater to a well, a well modification plan may be recommended. However, the Work Plan will lack specificity for some potential scenarios, as an integrated approach must be implemented that is responsive to the perceived level of risk to RID wells. As indicated in Section 5.0, specific recommendations for any well modifications will be provided in the hydrogeologic report that summarizes the results of the well investigations.

15. *Section 5.0, second sentence - please replace the word "clean" with a definition of how Montgomery and Associates is basing its clean determination.*

Comment noted. RID will revise the Task 2 Work Plan accordingly.

16. *Section 6.0, fifth sentence - Please remove this sentence from the work plan. The Working Agreement with RID and approval of work is not based on RID's funding source. ADEQ's conditional approval of the ERA was not contingent on funding.*

Please refer to response to ADEQ general comment #2.

17. *Table 2 - This table should also contain pump depth settings.*

Table 2 already contains the pump depth settings. This information is located in the last column on the right. The title of the column is "Pump Setting Depth".