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September 30, 2024

Mr. Clay McDaniel, Engineer via email: clay.mcdaniel@arkansas.gov
Arkansas Department of Energy and Environment
Division of Environmental Quality, Office of Land Resources
Assessment and Remediation
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Re: Monitoring Point Inspection – May 2024
NABORS Landfill (AFIN 03-00051)
1320 Landfill Road, Mountain Home, Arkansas 72653
Contract No.: 4600043737

Dear Mr. McDaniel:

On May 14, 2024, EnSafe Inc. conducted a site inspection of the NABORS Landfill at 1320 Landfill Road in Mountain Home, Arkansas (Site). The purpose of the inspection was to visually assess monitoring points associated with ongoing Operations and Maintenance and monitoring efforts completed at the Site. EnSafe's subcontractor, Harbor Environmental Inc. (Harbor) was onsite at the time of the inspection and accompanied EnSafe during the inspection.

The EnSafe and Harbor inspection included a visual inspection of accessible groundwater monitoring wells, springs/seeps, and landfill gas monitoring wells. The assessment focused on accessibility, current status of Site features, and required repairs. Attachment A includes a Harbor generated figure illustrating the overall layout of the Site and the location of leachate collection points, landfill gas monitoring points, and groundwater monitoring wells. A detailed discussion of the results of the visual inspection are provided in the table included as Attachment B. Attachment C includes a Harbor-generated photographic log of groundwater monitoring wells and landfill gas monitoring wells.

As detailed in the table in Attachment B, items of note include the following.

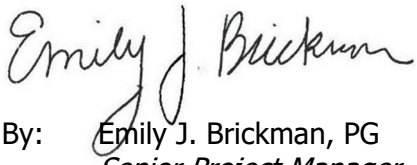
- Landfill groundwater monitoring well NAB-4 is damaged. The well casing is bent and cannot be locked; however, the well can still be sampled.
- Landfill gas monitoring well GP-16R is damaged. The well casing is bent and cannot be locked and the concrete pad is significantly cracked. The integrity of this location has been compromised.
- A number of monitoring wells lack identification.
- A number of well casings and bollards show signs of deteriorating or peeling/cracked paint.

- Access to a number of monitoring wells is hindered by steep terrain and, access to many locations is only achievable via all-terrain vehicle or by foot.

If the Arkansas Department of Energy and Environment, Division of Environmental Quality, Office of Land Resources Assessment and Remediation has any questions regarding this letter or attachments, please contact the undersigned by phone at 214-529-5600 or by email at ebrickman@ensafe.com.

Respectfully submitted,

EnSafe Inc.



By: Emily J. Brickman, PG
Senior Project Manager

Attachments:
Attachment A — Site Layout Figure
Attachment B — Inspection Results Summary Table
Attachment C — Photographic Log

Attachment A
Site Layout Figure

Harbor
5800 Evergreen Drive
Little Rock, AR 72205
P: 501.663.8800
www.HarborEnv.com

Client: ENSAFE

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Figure 1 - Site Layout
NABORS Landfill
Mountain Home, Baxter County, AR

Date: 5/2/2024
Drawn by: TH
Checked by: LD

Attachment B
Inspection Results Summary Table

NABORS Landfill Monitoring Points
1320 Landfill Road — Mountain Home, Arkansas
Contract No.: 4600043737

Monitoring Well ID	Latitude	Longitude	TD (feet below TOC)	Sampled (Y/N)	Needs ATV (Y/N)	May 2024 Status	Repairs Required - May 2024	October 2022 Status
CAO-1	36.460000	-92.449167	36.8	Y	N	Well intact and accessible by vehicle	Consider adding well identification labeling/painting	Well intact and accessible by vehicle
CAO-2	36.458889	-92.450833	45.6	Y	Y	This well was extended vertically during the landfill closure. The casing is bent slightly and is situated on the side of a steep slope. Access is via all terrain vehicle (ATV) only along sloped pathway.	Slightly bent, still functioning, no repairs required at this time	Well has been extended and is accessible by ATV — behind new chain-link fence
CAO-3	36.458333	-92.449722	23.1	Y	N	Well intact and accessible by vehicle	Consider adding well identification labeling/painting	Well intact and accessible by vehicle/ATV
MW-1	36.460833	-92.447222	77.2	Y	N	Well intact and accessible by vehicle — near leachate tanks	—	Well intact and accessible by vehicle
MW-1R	36.460556	-92.447222	78.6	Y	N	Well intact and accessible by vehicle — near leachate tanks	Consider adding well identification labeling/painting	Well intact and accessible by vehicle
MW-2	36.459842	-92.449760	48.7	Y	Foot	This well is intact but is down a steep, uneven, rocky slope that is highly overgrown with underbrush. Access is difficult and by foot only as it is behind a narrow gate in the fence.	—	Well intact and accessible by foot — behind new-chain link fence
MW-3	36.459167	-92.451389	39.6	Y	Y	This well was extended vertically during the landfill closure. The casing is bent slightly(but still can be sampled) and is situated on the side of a steep slope. Access is via ATV only along sloped pathway.	—	Well has been extended and is accessible by ATV — behind new chain-link fence
MW-4	36.460556	-92.451944	99.9	Y	Y	Well intact and accessible by vehicle; however, ATV access preferable	—	Well intact and accessible by ATV — behind new-chain link fence
MW-5	36.461944	-92.451944	89.0	Y	Y	Well intact and accessible by ATV via difficult, sloped pathway — try accessing from MW-4	—	Well intact and behind new chain-link fence, but direct access blocked due to erosion — equipment was carried on foot
MW-6	36.462500	-92.449444	68.3	Y	Y	Well intact and accessible by vehicle; however, ATV access preferable	—	Well intact and accessible by ATV — access road needs clearing
MW-7	36.463056	-92.445833	22.9	Y	Y	Well intact and accessible by vehicle; however, ATV access preferable	—	Well intact and accessible by ATV — access road needs clearing
MW-509D	36.460833	-92.445000	39.7	Y	Y	Well intact and accessible by ATV only via difficult, sloped pathway	Consider adding well identification labeling/painting	Well on top of topographic mound, but mostly accessible by ATV — grading would help access
MW-577	36.459722	-92.443056	55.2	Y	Y	Well intact and accessible by ATV only via difficult, sloped pathway	Consider adding well identification labeling/painting	Well on top of topographic mound, but mostly accessible by ATV — grading would help access
MW-633D	36.458056	-92.447222	88.1	Y	N	Well intact and accessible by vehicle; however, ATV access preferable but vehicle is fine	—	Well intact and accessible by vehicle
MW-689D	36.457500	-92.443333	43.8	Y	N	Well intact and accessible by vehicle; however, ATV access preferable	—	Well intact and accessible by ATV — access road needs clearing
NAB-2	36.460556	-92.445000	102.8	Y	Y	This is one of the wells extended during the landfill closure. The casing is bent slightly and is situated on the side of a steep slope, but can still be sampled. Access is via ATV only along a sloped pathway.	—	Well has been extended and is accessible by ATV
NAB-3	36.458333	-92.442778	46.3	Y	N	Well intact and accessible by vehicle; however, ATV access preferable	Consider adding well identification labeling/painting	Well intact and accessible by ATV — access road needs clearing
NAB-4	36.458056	-92.445833	140.0	Y	Y	This is one of the wells extended during the landfill closure. The casing is severely bent (but can be sampled) and is situated on the side of a steep, rocky slope. The well lid can not be closed. Access is on foot via a gate.	**It is recommended that the existing well completion (3-foot by 3-foot above grade completion) be reinstalled as an above grade completion so that the well lid can be closed and the integrity of the well can be confirmed.**	Well has been extended but is on steep slope with dense vegetation; partially accessible by ATV — behind new chain-link fence
NAB-7	36.462500	-92.446667	43.7	Y	Y	Well intact and accessible by vehicle; however, ATV access is preferable. This well is located in a dense cedar grove and is hard to locate.	Consider adding well identification labeling/painting	Well intact and accessible by ATV — access road needs clearing
NAB-8	36.461111	-92.451944	85.6	Y	Y	The well is accessible by vehicle, with less than 3 feet of water, and is purged and sampled with a bailer. The well goes dry and recovers slowly. It is typically sampled on the next day.	—	Well accessible by vehicle — purged and sampled with bailer
NE-2	36.460833	-92.444167	63.0	Y	Y	Well intact and accessible by ATV only via difficult, sloped pathway	—	Well intact and accessible by foot only — need better access The well is purged and sampled with a bailer.
NE-3	36.455000	-92.443056	27.8	Y	Y	Well intact and accessible by vehicle; however, ATV access preferable — access is from NAB-3	—	Well intact and accessible by ATV — access road needs clearing
NE-4	36.461762	-92.444888	112.2	Y	Y	Well intact and accessible by ATV only via difficult, sloped pathway	—	Well intact and accessible by foot only — need better access
NE-6	36.457222	-92.452500	18.2	Y	Y	Well intact and accessible by ATV only via steeply sloped pathway along power easement.	—	Well intact and mostly accessible by ATV.

NABORS Landfill Monitoring Points
1320 Landfill Road — Mountain Home, Arkansas
Contract No.: 4600043737

Springs/Seeps	Latitude	Longitude	Sampled (Y/N)	Needs ATV (Y/N)	May 2024 Status	Repairs Required (Y/N)	October 2022 Status
Landfill entrance seep	36.463330	-92.448060	Y	Foot	Flowing, collected sample	NA	No flow observed
Spring A	36.463273	-92.445690	Y	Foot	Flowing, collected sample	NA	No flow observed
Spring B	36.462549	-92.447661	N	Foot	No flow observed	NA	No flow observed
TSP-1	36.460893	-92.444001	Y	Foot	Flowing, collected sample	NA	No flow observed
TSP-2	36.460520	-92.444403	Y	Foot	Flowing, collected sample	NA	No flow observed
TSP-3	36.458881	-92.443324	N	Foot	No flow observed	NA	No flow observed
TSP-4	36.456670	-92.445560	N	Foot	No flow observed	NA	No flow observed
Class I Draw	36.458150	-92.450692	N	Foot	No flow observed	NA	No flow observed
Class IV Draw	36.455370	-92.448645	N	Foot	No flow observed	NA	No flow observed
SP-4	36.460636	-92.452376	N	Foot	Minimal flow in seep	NA	No flow observed
SP-5	36.459676	-92.449427	N	Foot	No flow observed	NA	No flow observed
SP-7	36.463022	-92.448468	Y	Foot	Flowing, collected sample	NA	Flowing, collected sample
Spring near NE-3	36.454925	-92.443042	N	Foot	Minimal flow, mixed with surface water	NA	No flow observed

Gas Monitoring Well	Latitude	Longitude	Checked with Four- Gas Monitor (Y/N)	Needs ATV (Y/N)	May 2024 Status	Repairs Required (Y/N)	April 2023 Status
GP-1	36.459125	-92.451500	Y	Y	Well intact, access is via ATV only along sloped pathway outside fence	N	
GP-2	36.458228	-92.449827	Y	N	Well intact and accessible by vehicle	N	
GP-3	36.456568	-92.449992	Y	N	Well intact and accessible by vehicle	N	
GP-4	36.455641	-92.447669	Y	N	Well intact and accessible by vehicle	N	
GP-5	36.458028	-92.446659	Y	N	Well intact and accessible by vehicle	N	
GP-6	36.457943	-92.445276	Y	N	Well intact and accessible by vehicle	N	
GP-7	36.458041	-92.443528	Y	N	Well intact and accessible by vehicle	N	
GP-8	36.459434	-92.442697	Y	N	Well intact and accessible by vehicle	N	
GP-9	36.461081	-92.443443	Y	N	Well intact and accessible by vehicle	N	
GP-10	36.462737	-92.443669	Y	N	Well intact and accessible by vehicle	N	
GP-11	36.464722	-92.442778	Y	N	Well intact and accessible by vehicle	N	
GP-12	36.467500	-92.443333	Y	Y	Well intact and accessible by ATV only	N	
GP-13	36.466111	-92.445556	Y	Y	Well intact and accessible by ATV only	N	Lock was rusted and well could not be opened or measured
GP-14	36.465000	-92.448333	Y	Y	Well intact and accessible by ATV only	N	
GP-14R	36.466111	-92.448611	Y	Y	Well intact and accessible by ATV only	N	
GP-15	36.463889	-92.451111	Y	N	Well intact and accessible by vehicle	N	
GP-16	36.462436	-92.451086	Y	N	Well intact and accessible by vehicle	N	
GP-16R	36.463611	-92.452500	Y	Y	Well was damaged a few years back by someone clearing electrical utility easement. The concrete pad is cracked and the stick-up well casing is bent preventing locking. The integrity of the well is compromised.	**It is recommended that the existing well completion (3-foot by 3-foot above grade completion) be reinstalled as an above grade completion so that the well lid can be closed and the integrity of the well can be confirmed.**	
GP-17	36.461260	-92.452072	Y	Y	Well intact and accessible by ATV only	N	
GP-18	36.459953	-92.452279	Y	Y	Well intact and accessible by ATV only	N	
GP-18R	36.460000	-92.452327	Y	Y	Well intact and accessible by ATV only	N	
Main Office Area	36.461323	-92.438399	Y	N	Accessible by vehicle	N	
Second Office	36.461348	-92.438463	Y	N	Accessible by vehicle	N	
Restroom/Storage	36.461284	-92.438386	Y	N	Accessible by vehicle	N	
Scale House	36.463505	-92.444331	Y	N	Accessible by vehicle	N	

Notes:
TD = total depth
TOC = top of casing
ATV = all-terrain vehicle
NA = not applicable

Attachment C
Photographic Log

Photo No. 1 **Date:** 5/13/2024 **Well ID:** CAO-1

Photo No. 2 **Date:** 5/13/2024 **Well ID:** CAO-2

Photo No. 3 **Date:** 5/13/2024 **Well ID:** CAO-3

Photo No. 4 **Date:** 5/13/2024 **Well ID:** MW-1

Photo No. 5 **Date:** 5/13/2024 **Well ID:** MW-1R

Photo No. 6 **Date:** 5/13/2024 **Well ID:** MW-2

Photo No. 7 **Date:** 5/13/2024 **Well ID:** MW-3

Photo No. 8 **Date:** 5/13/2024 **Well ID:** MW-4

Photo No. 9 **Date:** 5/13/2024 **Well ID:** MW-5

Photo No. 10 **Date:** 5/13/2024 **Well ID:** MW-6

Photo No. 11 **Date:** 5/13/2024 **Well ID:** MW-7

Photo No. 12 **Date:** 5/13/2024 **Well ID:** MW-509D

Photo No. 13 **Date:** 5/13/2024 **Well ID:** MW-577

Photo No. 14 **Date:** 5/13/2024 **Well ID:** MW-633D

Photo No. 15 **Date:** 5/13/2024 **Well ID:** MW-689D

Photo No. 16 **Date:** 5/13/2024 **Well ID:** NAB-2

Photo No. 17 **Date:** 5/13/2024 **Well ID:** NAB-3

Photo No. 18 **Date:** 5/13/2024 **Well ID:** NAB-4

Photo No. 19 **Date:** 5/13/2024 **Well ID:** NAB-7

Photo No. 20 **Date:** 5/13/2024 **Well ID:** NAB-8

Photo No. 21 **Date:** 5/13/2024 **Well ID:** NE-2

Photo No. 22 **Date:** 5/13/2024 **Well ID:** NE-3

Photo No. 23 **Date:** 5/13/2024 **Well ID:** NE-4

Photo No. 24 **Date:** 5/13/2024 **Well ID:** NE-6

Photo No. 1 **Date:** 5/13/2024 **Well ID:** GP-1

Photo No. 2 **Date:** 5/13/2024 **Well ID:** GP-2

Photo No. 3 **Date:** 5/13/2024 **Well ID:** GP-3

Photo No. 4 **Date:** 5/13/2024 **Well ID:** GP-4

Photo No. 5 **Date:** 5/13/2024 **Well ID:** GP-5

Photo No. 6 **Date:** 5/13/2024 **Well ID:** GP-6

Photo No. 7 **Date:** 5/13/2024 **Well ID:** GP-7

Photo No. 8 **Date:** 5/13/2024 **Well ID:** GP-8

Photo No. 9 **Date:** 5/13/2024 **Well ID:** GP-9

Photo No. 10 **Date:** 5/13/2024 **Well ID:** GP-10

Photo No. 11 **Date:** 5/13/2024 **Well ID:** GP-11

Photo No. 12 **Date:** 5/13/2024 **Well ID:** GP-12

Photo No. 13 **Date:** 5/13/2024 **Well ID:** GP-13

Photo No. 14 **Date:** 5/13/2024 **Well ID:** GP-14

Photo No. 15 **Date:** 5/13/2024 **Well ID:** GP-14R

Photo No. 16 **Date:** 5/13/2024 **Well ID:** GP-15

Photo No. 17 **Date:** 5/13/2024 **Well ID:** GP-16

Photo No. 18 **Date:** 5/13/2024 **Well ID:** GP-16R

Photo No. 19 **Date:** 5/13/2024 **Well ID:** GP-17

Photo No. 20 **Date:** 5/13/2024 **Well ID:** GP-18

Photo No. 21 **Date:** 5/13/2024 **Well ID:** GP-18R