

EXHIBIT H

CORRESPONDENCE FROM ADEQ

ADEQ

ARKANSAS
Department of Environmental Quality

November 20, 2014

Marcella J. Taylor
Mitchell, Williams, Selig, Gates, and Woodyard P.L.L.C.
425 West Capitol Avenue
Suite 1800
Little Rock, AR 72201

RE: Petition to Initiate Rulemaking to Change the TDS and Sulfate Criteria in the Red River

Dear Mrs. Taylor:

The Department has reviewed your draft Petition to Initiate Rulemaking regarding modification of the Total Dissolved Solids and Sulfate criteria in the Red River. The Department supports Domtar proceeding with proposing an administrative correction to the Site Specific Criteria based on the following rationale:

- o The Red River is a large river with historically high minerals levels in AR that are caused primarily by naturally occurring sources in upstream states (salt seeps in OK & TX);
- o Much of the segment of primary interest (the upper Red River segment in AR) has two totally different TDS criteria depending on which bank of the river you are on, 1100 mg/l TDS on the south bank (TX) and 850 mg/l on the north bank (AR);
- o The current AR criterion in the upper Red River segment in AR is based on a standards change in 1994 that would have selected a higher number if it had used the analysis and assessment methodology in place today;
- o The progression from high upstream criteria in OK and TX to low and lower criteria in AR segments, followed by much higher criteria in LA makes no sense and has no rational connection to the longstanding historical reality in the river.

It is understood that the proposed rulemaking and site specific criteria modification is dependent on the successful completion and ultimate approval of the pending SWEPCO Third Party Rulemaking on the Red River. The Department may modify this determination after consideration of all comments received during the Rulemaking Process.

Sincerely,



J. Ryan Benefield, PE
Interim Director