

## Allison, Becky

---

**From:** Nancy Baxter <baxternan@aol.com>  
**Sent:** Monday, August 08, 2016 7:27 PM  
**To:** Help-DrillProject  
**Cc:** news@buffaloriveralliance.org  
**Subject:** Investigatng C&H Pond Problems

To the ADEQ:

I am a concerned citizen who has followed the C&H hog farm story for several years now.

I have been appalled by the action and inaction of your department in failing to protect the environment of the Buffalo River valley and your unwillingness or inability to file complete and accurate environmental impact statements or to do the necessary testing to determine whether the hog waste produced by C&H is having a detrimental effect on Big Creek, the local water table, and the Buffalo.

I am encouraged by the fact that you have agreed to perform drilling tests to see if the C&H ponds are leaking into the subsoil and surrounding area. However, I share with the Buffalo River Watershed Alliance the following concerns and ask that they be addressed before drilling commences:

---

- Why is the drilling depth to only 100' when 120' has been recommended?
- Experts have recommended a minimum of three borings are needed. The plan only calls for one. Those with experience point out that the main expense involved with this type of investigation comes from getting the equipment to the site. Two additional core borings would not materially add to the cost.
- BCRET has asked to have at least 2 observers present during drilling. Since the Big Creek Research & Extension Team (BCRET) failed to report the ERI results, we object to the presence of two BCRET team members as observers at the site. This is especially egregious since Dr. Bert Fisher, BRWA's recommended expert, has so far not been invited to observe. As stated most forcefully in our letter to ADEQ, BRWA objects to the presence of any member of BCRET on the site during the investigation. If ADEQ persists in including BCRET it should be only one member of the BCRET team and then only with the presence of Dr Fisher, as a BRWA observer. ADEQ's selection of Mr Hubbard as an observer is only acceptable if no BCRET team members are present.
- Since previous dye tracing research in the area near C&H has indicated that groundwater movement at an astonishing velocity of approximately 2700 feet per day, the plan should include dye tracing before the borehole is closed.
- What does ADEQ plan to do if waste is found in the soil or bedrock?

The Buffalo River is one of the gems of the Arkansas landscape and it is your responsibility to ensure that it remains clean and clear for all Arkansans to enjoy. The smell of hog feces has no part in this picture. The C&H permit should never have been issued and the lack of transparency in the permitting process was and is unforgiveable.

I hope that you will do your duty by the people of Arkansas to complete this testing in the best and most accurate manner possible so that the environmental impact of this operation can be determined scientifically with input from all interested parties and qualified experts.

Thank you.

Nancy Baxter  
3804 Lookout Road  
North Little Rock, AR 72116  
[baxternan@aol.com](mailto:baxternan@aol.com)