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From: bill@williamdark.com
Sent: Friday, December 16, 2016 11:20 AM
To: drillingstudyquestions
Subject: 20161216-William-Dark

**Questions and Comments Pertaining to the Harbor Environmental Drilling Study,
C and H Hog Farm, Newton County, Arkansas**

Addendum

December 16, 2016

As an addendum to the questions I asked earlier, I have several other concerns regarding the drilling project at C and H Hog Farm.

Of greatest concern is the strong correlation of the void that was documented in the Field Notes at a drilling depth 59' with the low resistivity values (~50 Ohm-m) in the upper portion of Resistivity Transect MTJ108. What is your interpretation of that data?

Because water and any associated contaminant movement in a karst setting can be mostly downward near the surface, results from a single borehole to the side of the holding ponds would not necessarily demonstrate that the ponds are not leaking; only that no contaminants were detected where the borehole is located. I suspect looking for conduits through which waste contaminants could move by punching holes in the ground will likely be fruitless. I believe a better solution would have been to drill at least two or three monitoring wells (as recommended by Dr. Halihan), two of which should be located down-gradient from the holding ponds. Why were three boreholes not drilled, and why was no dye tracing study performed in the well that was drilled? As other concerned parties have expressed, much more data could have been extracted from the project had three wells been drilled and monitored, so that the hydraulic gradient could be determined, along with data to construct more accurate models of groundwater movement so that all interested parties have a better understanding of the complex hydrogeology of the area.

Given the mission of ADEQ – “to protect, enhance, and restore the natural environment for the well-being of all Arkansans”, I have to wonder how the state can justify spending hundreds of thousands of taxpayer dollars to effectively support a private enterprise run by a handful of folks that believe spreading millions of gallons of hog waste on the banks one of the largest tributaries of the Buffalo National River is ok. While I would like to believe that ADEQ has good intentions, it appears to me that the department is more concerned with protecting the interests of the agriculture community than the interests of the vast majority of Arkansans who want protection for our nation's first National River. I hope ADEQ will schedule a meeting for public comment and questions following your assessment of the drilling study.

Thank you again for your time. I look forward to your reply.

William Dark