



July 12, 2007

SKA Project No. 7007-0001

Mr. Todd W. Brindle  
Superintendent  
United States Department of the Interior  
National Park Service  
Big Thicket National Preserve  
6044 FM 420  
Kountze, Texas 77625

**Re: Response to National Park Service Comments of June 4, 2007  
Work Plan Limited Soil and Groundwater Investigation and Pit Closure for the  
Buford Curtis, Inc. James Rafferty Fee #1**

Dear Mr. Brindle:

SKA Consulting, L.P. (SKA) has received your comments of June 4, 2007 regarding the above-referenced site. We have provided responses as shown below to each of your comments. Your comments are included below in bold for clarity.

- 1. All sample locations should be inspected for topographic lows/surface depressions where surface releases of liquid hydrocarbons might be expected to collect. If low areas/surface depressions are identified within 5 feet of the proposed sampling location, the sample location should be moved to that topographically lower adjacent location.**

Response

SKA concurs with this recommendation.

- 2. We recommend the addition of one soil sample location central to the dashed outline area of Fig. 1 approximately half way between the temporary well and the next northern soil sample location.**

Response

SKA does not concur with this recommendation. SKA concludes that: (1) based on the limited horizontal extent of soil impacts as previously determined by Michael Baker, Jr., Inc. (Baker) (approximately 500-square feet); (2) the number of soil sample locations already proposed by SKA within this area (total of 11 soil sample locations); and (3) the distance of the NPS recommended soil sample location relative to our proposed soil sample locations (less than 10 feet away); no additional sample locations or soil samples will be required to adequately assess this area of concern.

- 3. The soil testing protocol should include the collection of no fewer than two soil samplers per hand auger/borehole at locations occurring within the dashed outline area of Fig. 1 (a total of 8 samples from 4 locations) for submission to the analytical laboratory for testing. The upper interface of any clay layer and**

**overlying coarser material should also be inspected for visual evidence, or odors, of hydrocarbons, and with the photo-ionization detector, as a basis for possible sampling.**

Response

SKA's Work Plan (SKA Proposal No. M2007P066; dated April 20, 2007) outlines the testing protocol for each soil boring and temporary monitoring well location as follows:

- *Testing of the surficial or near surficial soil sample (0-1, 1-2, and/or 2-3 ft-bgs); and/or*
- *Testing of the soil sample with the highest PID field screening result; and/or*
- *Testing of the soil sample from the soil-water interface.*

*SKA will collect additional soil samples at other intervals within the soil column (i.e., at random depths and/or terminal depth of the boring); however, these soil samples will be placed on a "Hold" status in the testing laboratory pending the results of the initial soil testing results.*

SKA does not concur with this recommendation. As indicated in our SOW above, SKA proposes to initially analyze only one shallow soil sample from each soil boring location. However, if elevated concentrations of petroleum hydrocarbon constituents are detected in this first soil sample, then additional (deeper) soil samples from the same soil boring will be analyzed in the testing laboratory. Conversely, if no concentrations of petroleum hydrocarbons constituents are detected, SKA will not analyze any additional deeper soil samples.

- 4. Soil sampling of the temporary monitoring well should also include a minimum of two sample depths (instead of up to two samples), and should include some sample from the soil-water table interface and one other based on the soil testing protocol.**

Response

SKA concurs with this recommendation. SKA will analyze two soil samples from the temporary monitoring well proposed for the site. As a result, SKA will ensure that one of the soil samples will be collected from the soil-water interface for analytical testing.

- 5. The groundwater sampling protocol should specify that no more than a 3 foot well screen length should be used, and the screen interval should be set across the water table (extending approximately 1 foot above and no more than 2 feet below the water table) to avoid the dilution of the sample from the inclusion of groundwater two or more feet below the top of the saturated zone.**

Response

SKA's Work Plan (SKA Proposal No. M2007P066; dated April 20, 2007) outlines the groundwater sampling protocol as follows:

*Based on the soil type and field observations, SKA's on-site Geologist will determine the completion depth and screen interval for the temporary monitoring well in the field. Generally, the temporary monitoring well will be advanced up to 10 feet beyond the contact with the uppermost transmissive zone (shallow groundwater) estimated at*

*approximately 10 feet below ground surface (ft-bgs) in an effort to obtain representative groundwater samples.*

As indicated in our SOW above, SKA proposes to complete the temporary monitoring well with no more than 10 feet of well screen as per Texas Commission on Environmental Quality (TCEQ) Regulatory Guidance document RG-411. The well screen will be positioned at the vertical location within the water column that is most likely to intercept contaminants of concern (i.e., at or near the top to the water table). According to the TCEQ guidance document, this method is acceptable to obtain groundwater samples representative of in-situ conditions.

- 6. The use of a backhoe to drain the pit onsite would result in greater environmental impacts than the use of a vacuum truck and hose alone. Unless some justification for its use is presented, the reference to this equipment on page 6 of the Scope of Work (SOW) should be removed.**

Response

Given the fact that closing the pit per Railroad Commission of Texas (RRC) rules and regulations is beyond the scope of operations that may be conducted under a temporary access permit as per 36 Code of Federal Regulations (CFR) §9.38(a)(1), SKA proposes to collect the soil samples from the bottom of the pit utilizing hand-auger techniques. Therefore, the pit will not be drained or backfilled at this time. Based on telephone conversations with Haigler "Dusty" Pate, SKA understands that the SOW will not need to be updated if the National Park Service (NPS) agrees to the responses presented in this letter.

On behalf of Buford Curtis, Inc., SKA requests that the NPS issue a temporary access permit to perform limited soil and groundwater investigations at the above-reference site as outlined in SKA's Work Plan/Limited Soil and Groundwater Investigation and Pit Closure proposal dated April 20, 2007 and this response letter.

SKA understands that this temporary access permit will enable SKA to collect soil and groundwater samples from the site. At this time SKA does not plan to remove any water from the pit or close the pit (i.e., remove free liquids and backfill the pit) as per a Railroad Commission of Texas (RRC) violation letter dated December 19, 2006.

SKA anticipates that the field activities can begin within 10 business days of receiving the temporary access permit. Additionally, SKA anticipates that the soil and groundwater sampling activities will take two days to complete. SKA will provide all appropriate parties three business days notice before commencing the field activities.

Once the analytical results from the soil and groundwater samples are received from the analytical testing laboratory and interpreted by SKA, SKA will submit a Plan of Operations as per 36 CFR §9.6 to the NPS. SKA understands that an approved Plan of Operations serves as an access permit that will allow SKA and its subcontractors access to the site in order to execute the Plan of Operations.

Once the Plan of Operations has been executed, SKA will submit a final letter report to the NPS documenting that there are no outstanding concerns at the site. Additionally, SKA will request

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that the NPS issue a No Further Action (NFA) letter to Curtis Buford, Inc. which states that Curtis Buford, Inc. is not required to perform additional reclamation activities at the site.

SKA looks forward to working with you in completing this project. Should you have any questions regarding this transmittal, please do not hesitate to call me at (713) 266-6056.

Sincerely,

**SKA CONSULTING, L.P.**

A handwritten signature in blue ink that reads "Adam Taylor". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Adam Taylor  
Project Manager