

JAMES, DRIGGS, WALCH, SANTORO,
KEARNEY, JOHNSON & THOMPSON

ATTORNEYS

3773 HOWARD HUGHES PARKWAY, SUITE 290N
LAS VEGAS, NEVADA 89109
TEL (702) 791-0308
FAX (702) 791-1912
EMAIL FIRM@JAMES-LAW.COM

MARK A. JAMES
JOHN E. LEACH
GREGORY J. WALCH
NICHOLAS J. SANTORO
MICHAEL E. KEARNEY
J. DOUGLAS DRIGGS, JR.
RICHARD F. HOLLEY
DAVID G. JOHNSON
RONALD J. THOMPSON
JOHN E. HAM

JAMES E. WHITMIRE, III
BRADLEY M. BALLARD
ELIZABETH E. WACHSMAN
L. KIRK WILLIAMS
JAMES B. MACROBBIE*
DEAN S. BENNETT
KIRBY C. GRUCHOW, JR.
JENNIFER LAZOVICH
ANGELA K. ROCK
ANDREW J. GLENDON*
RODNEY S. WOODBURY
*CALIFORNIA ONLY

August 1, 2000

Mr. Steve Wall
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: Eagle Drilling Inquiry

Dear Mr. Wall:

Republic DUMPCo, Inc. ("Republic") has retained our firm to inquire into certain aspects of Eagle Drilling's ("Eagle") activities at the Sunrise Landfill. As you and Ms. Doty discussed on July 20 with David Faircloth and Alan Gaddy, Eagle's use of an unapproved drilling foam and improper "seal" installation in wells 2C and 5B3 required further investigation by Republic. As you are aware, Republic removed Craig Chaffee of Eagle from the site upon Republic's July 5 discovery of the improperly installed cross-contamination seal.¹ This letter presents our findings.

Eagle's Use of Thatcher TF Foam

Approximately 16 drums of Thatcher TF Foam were discovered during your site visit. EPA previously approved the use of Sinclair Foam for reaming purposes followed by installation of a concrete seal at wells within the Sunrise Landfill. Our investigation revealed that Mr. Chaffee ordered ten 55-gallon drums of Thatcher TF Foam on June 22, and six drums on June 26, and that he instructed employees to pour the Thatcher TF Foam into Sinclair foam containers to conceal the use of the foam. We were unable to discern from our conversations with Eagle employees why Eagle used the unapproved foam.

Thatcher TF Foam was most likely used during reaming activities at wells 3B, 5B3, 6B, 11A, and 12B. Republic's investigation indicated that Eagle may have used Thatcher TF Foam during

¹ The Eagle Drilling B-90 drill rig was released from the site on July 20 following the discussion for the need of a small rig such as the B-90. The T3W rig of Western HazMat is substantially larger and fulfills the same function as Eagle's B-90.

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well 2C reaming operations as well. Of all the wells that Eagle apparently used Thatcher TF Foam, only wells 6B and 11A have been advanced to depths beyond the reaming activities and installation of the concrete seal. Based upon our understanding of Eagle's drilling process, all locations where Thatcher TF Foam was used in Wells 6B and 11A have now been pressure grouted and sealed off from lower formations. Wells 2C, 3B, 5B3 and 12B have been abandoned and are being redrilled by a different contractor. Wells 2C and 5B3 were abandoned because of the improper concrete seal installation referred to above and in your previous conversations with Alan Gaddy. Well 3B experienced a cave-in and collapsed. Well 12B was reamed crooked by Western HazMat's T3W rig and the steel casing could not be installed. Well 6B was reamed to approximately 140 feet and a concrete seal installed. The well has since advanced to approximately 370 feet where water has been contacted. Well 11A was reamed to 252 feet and the concrete seal has been installed. The well has since been advanced to 379 feet where water has also been contacted.

The review of the Thatcher TF Foam MSDS reveals the presence of Isopropyl Alcohol as a component of the foam. Water analyses of wells 6B and 11A will include analysis for alcohol.

Republic continues to monitor activities of all contractors at the Sunrise Landfill, and will continue to keep EPA informed of developments. Republic intends to pursue this matter further with Eagle and fully comply with all of EPA's directives regarding the Sunrise Landfill investigation.

If you have any questions regarding this investigation, please do not hesitate to contact me at (702) 791-0308.

Very truly yours,



Gregory J. Walch, Esq.