



March 3, 2015

Becky Keogh  
Director  
Arkansas Department of Environmental Quality  
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**VIA FIRST CLASS MAIL  
AND ELECTRONIC DELIVERY**

Ryan Benefield  
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Re: Modification Request for C&H Hog Farms, Inc. NPDES Permit No. ARG590001,  
File AFIN 51-00164

Dear Director and Deputy Director:

This letter is in response to recent documents submitted by C&H Hog Farms, Inc. to your office including its Modification Request posted January 24, 2015, its Revised Nutrient Management Plan dated February 1, 2015, and its Revised Comprehensive Nutrient Management Plan, posted February 26, 2015.

All of these documents continue to contain incorrect maps specifically regarding ownership of field 5 and parts of fields 12 and 16. According to former Director Marks in a letter to Earthjustice dated February 20, 2014, C&H Hog Farms was to submit new, correct maps to ADEQ by March 30, 2014. We are not aware of any new maps and they are not included in the Revised NMP.

However, we do note that the Big Creek Research and Extension Team is using some unexplained field numbers, including a field 5a. This field is not part of the NMP and is reportedly not receiving any waste applications from C&H. This only further confuses the ongoing errors and misrepresentations regarding application field ownership and identification.

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Until these ongoing errors are corrected we ask that all requests by C&H for permit modifications be denied.

Sincerely,



Monica K. Reimer  
Attorney

On behalf of:



Bob Allen  
Arkansas Canoe Club



Jack Stewart  
Buffalo River Watershed Alliance



Emily Jones  
National Parks and Conservation Association



Robert Cross  
Ozark Society

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