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DEPARTMENT OF
WATER RESOURCES

Attorneys for City of Pocatello

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	Subcase Nos. 29-271 et al. (see Attachment)
	)	
Case No. 39576	)	CITY OF POCATELLO'S
_____	)	RESPONSE TO BRIEF OF UNITED
	)	WATER IDAHO, CITY OF NAMPA,
	)	AND CITY OF BLACKFOOT
	)	ADDRESSING ALTERNATIVE POINTS
	)	OF DIVERSION CONDITION

INTRODUCTION

The Providers present a set of broad and general scenarios to suggest how a condition similar to Pocatello's could be generally administered. Because the court must resolve Pocatello's challenge based on the specific facts and issues in the City's SRBA proceedings, Pocatello responds to the Providers' Amicus Brief based on the SRBA record for the City's interconnected municipal delivery system in town.¹

- Pocatello's intown delivery system involves 22 existing wells, 21 ground water rights, and four surface water rights.²
- The existence of the 22 wells as of November 19, 1987 is not an issue;³ and the individual well capacities as of November 19, 1987 are not a major issue.⁴

¹ For purposes of responding to the Providers' Amicus Brief on the "alternative points of diversion" condition, Pocatello's response relies on the record for the City's intown delivery system. The City's Notice of Challenge includes additional issues: the delivery system at the airport, alternative points of diversion for the City's surface water rights, priority dates for the Alameda wells, municipal purpose of use for [get number], and inclusion of well 44. The City's Opening Brief on Challenge (filed June 5, 2009) and the City's Reply Brief in Support of Challenge (to be filed August 3, 2009) address all issues.

² The four surface water rights and 21 ground water rights are listed in Appendix A. The 22 interconnected wells are listed in Appendix B to this Response Brief.

- The rates of diversion for the 21 ground water rights and the four surface water rights are not at issue.⁵
- The priority dates of the four surface water rights and 19 of the 21 ground water rights are not at issue.⁶
- *Alternate point of diversion conditions* are recommended for eighteen of the 21 ground water rights.
- The 22 wells are recommended as the alternate points of diversion for each of the 18 ground water rights.

Pocatello addresses four points in its Response Brief:

1. The overall operation of the *alternate points of diversion* condition (Pocatello's and the Providers') for the entire intown interconnected system (Pocatello's and the Providers').
2. The record and the issues in Pocatello's Notice of Challenge.
3. Accomplished transfers and the role of the SRBA's November 19, 1987 "snap shot in time".
4. The administration of SRBA rights already decreed with alternate points of diversion but without any *alternate points of diversion* condition.

³ The pertinent "snapshot in time" for Pocatello's claims under I.C. 42-1425 captures the status of the 22 interconnected wells serving as alternate points of diversion for the City's associated ground and surface water rights as of November 19, 1987. The snapshot represents the final configuration of the wells, which were variously developed, reconfigured, and/or replaced according to the City's needs during the preceding 82 years.

⁴ The total combined capacity of Pocatello's 22 interconnected wells as of November 19, 1987 is between 95.49 cfs and 100.34 cfs. There is a 4.85 cfs variance/range primarily because the physical capacity listed for wells 14 and 33 is shown as 2.23 cfs and 2.67 cfs, respectively, in the SWC-Pocatello Stipulation Agreement (Feb. 23, 2007), but listed in the 2003 Director's Report (July 10, 2003), and the 2006 Supplemental Director's Report (April 13, 2006), as .22 cfs and .21 cfs, respectively.

The 2003 Director's Report, the 2006 Supplemental Director's Report, and the 2007 SWC-Pocatello Stipulation Agreement all agree on the individual well capacity for 15 of the 22 wells (wells 2, 7, 12, 13, 15, 16, 18, 21, 22, 23, 26, 28, 31, 32, 34).

Seven of the 22 wells (wells 3, 10, 14, 27, 29, 30, and 33) are listed among these three documents with varying capacities as of November 19, 1987; however, the total combined variance is at most 4.85 cfs. Appendix B to this Response Brief tabulates the information summarized in this footnote.

⁵ The 21 ground water rights and four surface water rights total 114.668 cfs. The recommended rates of diversion for these rights are listed in Appendix A to the Response Brief. The rates of diversion are not contested.

⁶ The priority dates for the 21 ground water rights and four surface water rights are listed in Appendix A to the Response Brief.

1. **In contrast to the Providers' scenarios, any administration under the condition leaves Pocatello with no use or reduced use of six operating wells and no use or reduced use of its six most senior water rights.**

Understanding that the condition is to operate only when necessary for administration, there is a dramatic difference between the Providers' scenarios and how the condition would operate system-wide for Pocatello's intown interconnected system.

All of the Providers' wells are accounted for in the conditions for the Providers' four water rights, so it is a matter of location, priority date, and/or "some new injury" as to whether a particular well can operate during administration.

In contrast, if the condition(s) now recommended for Pocatello is used in administration, six of the City's 22 operating wells are either not listed or listed with reduced capacity⁷ and seven non-existent/replaced wells are listed.⁸ Five of the City's most senior water rights (of the 18 for the intown system) have no operating well identified in the condition, and a sixth senior water right (of the 18) has operating wells for only part of the right.⁹

2. **Pocatello's proceedings are based on the November 19, 1987 "snapshot in time" of the SRBA proceedings and the requirement that accomplished transfers be established practices as of November 19, 1987.**

- A. **Pocatello's proceedings do not involve increases in individual well capacity after November 19, 1987.**

Each of the Providers' examples is based on a common factual scenario involving an integrated diversion and delivery system made up of four municipal water rights and four municipal wells, each diverting 1000 gpm and with priority dates respectively of 1920, 1945,

⁷ Wells 10, 12, 15, and 34, all operating now and as of November 19, 1987, are not listed. Wells 2 and 13 are listed below their current and November 19, 1987 established capacities.

⁸ The seven non-existent/replaced wells are Pocatello wells 1 (and its replacement well 5), 4, and 6; and Alameda wells 1, 2, 6, and 7.

⁹ Ground water rights 29-11339, 29-13558, 29-13559, 29-13561, and 29-13562 have no operating wells identified. Ground water right 29-13560 has two operating wells and one non-existent well listed.

1970, and 1985. Because the Providers' examples are also based on water rights claimed in the SRBA as accomplished transfers, the elements of each water right were established as of November 19, 1987.

The Providers' four wells, each with a 1000 gpm diversion rate (capacity) as of November 19, 1987 help illustrate that increases in the capacity (1000 gpm) of individual wells – post-November 19, 1987 – is not an issue in Pocatello's Notice of Challenge.

Prior to trial, using the Providers' 1000 gpm as an analogy, IDWR was concerned about – and the condition was necessary to address -- *increases above 1000 gpm* for any of the wells. At trial IDWR agreed that *increases above 1000 gpm* were no longer a concern because Pocatello had already stipulated that there would be no increases in the November 19, 1987 diversion rates for its individual wells, absent administrative approval. At trial, IDWR then testified that the condition was necessary to address *increases in the length of time that 1000 gpm was pumped* from any of the wells. This analogy illustrates the following discussion of Pocatello's record on Challenge.

In its April 2006 Supplemental Director's Report, IDWR explained that the "Other Provisions Necessary Condition" was necessary -- for eighteen ground water rights¹⁰ serving the City's interconnected culinary delivery system in-town and two ground water rights¹¹ serving the City's interconnected culinary delivery system at the airport -- in order to prevent injury that could result from the City's operation of the alternate points of diversion (wells) claimed for these water rights under the accomplished transfer statute.¹² Specifically, IDWR was concerned

¹⁰ 29-2401, 29-2499, 29-4221, 29-4223, 29-4224, 29-4225, 29-4226, 29-7106, 29-7322, 29-11339, 29-11348, 29-13558, 29-13559, 29-13560, 29-13561, 29-13562, 29-13637, and 29-13639.

¹¹ 29-7450 and 29-13638.

¹² Supplemental Director's Report Regarding City of Pocatello's Basin 29 State-Based Water Rights at 12-14, *In Re SRBA Case No. 39576* (April 13, 2006)(Supplemental Director's Report).

about injury to other water users due to a possible future increase in capacity or rate of diversion at any of Pocatello's wells serving as alternate points of diversion. On page 14 of the Report, IDWR explained: "[i]f at some time in the future, the City increases the pumping capacity of a well within the City's interconnected well system, and it reduces the amount of water available to another water user, [the] condition [would preserve] the ability of a water user to protect their water right."¹³ By analogy to the Providers' scenarios, this is IDWR's concern about *increases above 1000 gpm* for any of the wells.

IDWR further explained that the purpose of the "other provisions necessary condition" was to "preserve the historical relationship between various users,"¹⁴ and again identified the specific diversion rates of Pocatello's individual wells as the "historical relationship" to be preserved:

Allowing the City to increase the diversion rate withdrawn from any particular well by listing multiple, alternate PODs on its water rights could cause injury to other surface and ground water users.¹⁵

By analogy to the Providers' scenarios, this restates IDWR's concern about *increases above 1000 gpm* for any of the wells.

In its agreement subsequently negotiated with the Surface Water Coalition, and also offered as settlement to the State and IDWR, Pocatello stipulated that it would not increase the capacity of any of its interconnected wells beyond the well's individual capacity which existed in 1987 without first seeking administrative approval.¹⁶ The State and IDWR did not accept the Pocatello/Surface Water Coalition Agreement as settlement of Pocatello's objections to the

¹³ Supplemental Director's Report at 14.

¹⁴ Supplemental Director's Report at 15.

¹⁵ Supplemental Director's Report at 15.

¹⁶ See Stipulation and Agreement Between Pocatello and the Surface Water Coalition in Pocatello's SRBA Subcases 29-271 *et seq.*, (Feb. 23, 2007)(IDWR Exhibit No. 43 at trial).

“Other Provisions Necessary Condition.” However, at trial, Director Tuthill specifically acknowledged that Pocatello’s Stipulation Agreement with the Surface Water Coalition would “take care of” IDWR’s concerns about possible injury from an increase in the rate of diversion (pumping capacity – the “1000 gpm”) of any well beyond that well’s capacity established as of November 19, 1978.¹⁷

Possible injury due to an increase in the established rate of diversion from any individual well -- the alternate points of diversion -- was not an issue at trial because the record established that there would be no increases in the diversion rates for individual wells, absent administrative approval. By analogy to the Providers’ scenarios, *increase above 1000 gpm* for any of the wells was no longer a basis for the condition and was not an issue at trial; and Pocatello’s record is not a basis for a condition (as suggested in the Providers’ Amicus Brief) that allows increases above the November 19, 1987 established well capacity without prior administrative approval.

With the condition no longer necessary to protect against the increases in well capacity cited in the Director’s 2006 report to the court, IDWR’s trial testimony focused instead on possible injury from *increases in the length of time* that a well’s established capacity was pumped. This was a new position for IDWR, not previously articulated in the record before the court. With reference to the Providers’ scenarios, the capacity of each well would be 1000 gpm, but the injury concern would come from the **well pumping more hours per day** than it had pumped historically.

At the beginning of his testimony, Director Tuthill expressed IDWR’s fears about injury broadly: (1) well interference that could happen in the future as a result of pumping wells for longer periods of time; and (2) conjunctive administration concerns relative to diversion from

¹⁷ Transcript of Proceedings, Volume II at 292, lines 18-25, through p. 293, lines 1-4, *In Re SRBA Case No. 39576*, Subcase Nos. 29-00271, et al., (February 26, 2007); *see also*, Director Tuthill’s testimony at Tr. Vol. II at 293, lns 18-24.

one location as compared with diversion from another location.¹⁸ Later in his testimony, Director Tuthill clarified these issues by providing the court with illustrative examples. His first example cites well interference based on a scenario where a 1970 priority municipal well historically pumped 12 hours per day, increased pumping to 24 hours per day in the year 2010.¹⁹

Director Tuthill further explained, in contrast to the April 2006 Supplemental Director's Report, that the condition was imposed in order to provide water users protection from local interference due to increases in the volume pumped over time, not due to increases in the rate of diversion from specific wells.²⁰ At trial, Director Tuthill acknowledged that the Supplemental Director's Report did not contain anything about possible injury resulting from increases in the number of hours per day that the City operates its wells.²¹

If the “alternative points of diversion” condition is retained, the Providers’ Amicus brief does not address administration where there is no change in established well capacity for the “alternative points of diversion.”

B. Providers’ scenarios interpret the “snap shot” and the accomplished transfers to permit the subsequent doubling, tripling, or quadrupling of November 19, 1987 well capacities.

Each of the Providers’ example scenarios describes a situation where there is a dramatic increase in the rate of diversion (capacity) at one or more wells, far beyond the well’s 1000 gpm

¹⁸ Tr. Vol. II at 233, ln. 20-25; *see also*, Director Tuthill’s testimony at Tr. Vol. II at 293, lns 18-24.

¹⁹ Tr. Vol. II at 237, ln 23, through p. 239, ln 14.

²⁰ Tr. Vol. II at 240, lns 7-12 (“However, because of the -- of the power of the municipal right and the opportunity to continue to pump and to increase the volume pumped over time, our assessment was that we needed to provide some protection from local interference due to conditions that might change in the future.”).

²¹ Tr. Vol. II at 289, ln 8 through page 290, ln 5 (“The 706 report does not explicitly state that aspect. It does refer to injury between surface and groundwater, but does not explicitly state the number of hours pumping. That’s correct.”).

rate of diversion (capacity) that was established as of November 19, 1987.²² This is problematic because the issue presented at trial in Pocatello's proceedings was whether IDWR could rightfully impose the condition based on concerns about future injury from increases in the length of time (hours per day) a well's established capacity (1000 gpm) was pumped, NOT from future increases in the individual well's established capacity.

C. The condition proposed for Pocatello's water rights is different from the Providers' condition because Pocatello's condition lists wells no longer in existence on November 19, 1987, omits wells that were in existence on November 19, 1987, and lists individual well capacities that do not correspond to November 19, 1987 well capacities.

Pocatello has 21 ground water rights and 22 operating wells associated with the City's interconnected intown system. All 22 wells are listed as alternate points of diversion for the 18 ground water rights with the condition. However, the *alternate points of diversion conditions* – which will operate in times of administration - include only 18 of the 22 *operating* wells, list two operating wells with reduced capacity, and identify seven *non-existent/non-operating* wells.²³

The condition for Pocatello's eighteen water rights and the example condition for the Providers' four water rights each begin with identical introductory language concerning future administration:

To the extent necessary for administration between points of diversion for ground water, and between points of diversion for ground water and hydraulically connected surface sources, ground water was first diverted under this right

²² See, e.g., Providers' Brief at 2 (the Providers set up their first example by assuming the partial decrees obtained for each water right under the accomplished transfer statute would allow the hypothetical city to pump any of its water rights, or any combination of its water rights, from any well, and further, that if the city could "improve production from the 1985 well, it could pump both the 1920 water right and the 1985 water right from the newer well—without seeking a transfer.")

²³ See footnotes 7 and 8, *supra*. In addition, these seven wells are not currently in operation and were not in operation as of November 19, 1987. The wells are documented in Pocatello's historical well development but IDWR never recommended these wells as points of diversion for the City's municipal water supply because they no longer existed or were no longer in operation as of November 19, 1987.

Following this common introduction, the Providers' four wells are identified by the conditions. In contrast, of the 22 wells operating in November 19, 1987 and operating today, the City's conditions do not identify four wells, list two with reduced capacity, and identify seven non-existent/replaced wells.

Ten²⁴ of the eighteen ground water rights have conditions that *match* the Providers' example:²⁵

- the condition identifies a single well;
- the well is in existence on November 19, 1987;
- the well's capacity as of November 19, 1987 is identified; and
- the well's capacity as of November 19, 1987 matches the rate of diversion for the associated water right.

Five of Pocatello's water rights have conditions that *do not match* the Providers' example because the Pocatello conditions only identify wells no longer in existence and no longer operating on November 19, 1987.²⁶

**3. SRBA decrees confirm accomplished transfer practices
in existence as of November 19, 1987.**

The redundancy cited in Pocatello's testimony and briefing is redundancy among existing well capacities: when a well fails or needs repair, production from other wells on the system will

²⁴ 29-2499, 29-4221, 29-4223, 29-4224, 29-4225, 29-4226, 29-7106, 29-11348, 29-13637, and 29-13639.

²⁵ The condition for the Providers' four water rights and Pocatello's eighteen water rights each begin with identical introductory language concerning future administration:

To the extent necessary for administration between points of diversion for ground water, and between points of diversion for ground water and hydraulically connected surface sources, ground water was first diverted under this right

Following the common introduction, the condition is tailored to each ground water right to identify a well (or wells) -- by name and legal description -- from which ground water was first diverted for the specific ground water right. For the Providers' four ground water rights, a different well is identified in each of the conditions; each well is in existence on November 19, 1987 with a capacity that matches the rate of diversion for the associated water right. The ten Pocatello ground water rights in Footnote 24 have similar conditions to the Providers' scenarios.

²⁶ 29-11339, 29-13558, 29-13559, 29-13561, 29-13562.

be increased to maximum capacity and/or operated for more hours, but there is no increase to any individual well's capacity established as of November 19, 1987.

In the Providers' scenarios, a primary reason for the condition is to address increases in individual well capacity post-November 19, 1987 – without prior approval through IDWR's transfer process. The premise is that SRBA decrees with alternate points of diversion – confirmed by accomplished transfers pursuant to 42-1425 – provide notice that any of the alternate points of diversion (APODs) can be increased to divert up to the combined rates of diversion for all the water rights served by the APODs. In the Providers' examples, the four ground water rights total 4000 cfs. Therefore, the individual wells which each had a capacity of 1000 cfs on November 19, 1987, could each have its capacity increased to 4000 cfs, so long as only 4000 cfs is diverted at any one time for all the wells combined. The accomplished transfer is deemed to allow combined well capacities to increase from 4000 cfs to 16,000 cfs.

4. Effect on existing SRBA decrees for ground water rights without the APOD condition.

The historical relationship that must be proved for accomplished transfers is what existed as of November 19, 1987. The SRBA decree confirms that relationship. The Providers' scenarios presume that the historical relationship includes future increases in well capacity. Pocatello's record preserves the well capacities in existence on November 19, 1987 and establishes the diversion of multiple water rights at these wells (alternate points of diversion) within the individual well capacities as of November 19, 1987.

What notice is provided by the decree of accomplished transfers in the SRBA? The notice is that Pocatello has exercised and will continue to exercise its various priority ground water rights at the alternate points of diversion listed in the City's SRBA claims, IDWR's 2003, 2006, and 2007 reports, and the 2007 Pocatello/SWC Stipulation. The claims were documented

by an extensive record summarized in the City's ground water development timeline. This is notice that these ground water rights and priority dates are diverted from these wells at the well capacities stipulated prior to trial. It was not notice that the city would increase any individual well's capacity, post-November 19, 1987, without first obtaining prior administrative approval.

At this point in the SRBA adjudication, there have been many ground water rights decreed with alternate points of diversion without any APOD condition. If the condition is necessary as IDWR/Providers claim, it is necessary because of a presumption that November 19, 1987 well capacity can be increased – for any and all of the wells that are APODs – limited only by the combined rates of diversion of the water rights served by the APODs. If, instead, the APODs are operated without increases in individual well capacity – as Pocatello's record establishes – the condition is unnecessary.

This interpretation is reasonable and practical for administration of SRBA decrees with APODs. Otherwise, ground water rights already decreed with APODs in the SRBA without the condition would be understood to have the ability to increase individual well production up to the total cfs of water rights served by the APODs. This is not consistent with the “snap shot in time.”

CONCLUSION

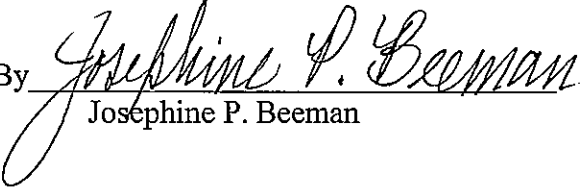
According to IDWR, the condition is a necessary tool that IDWR must have in order to properly administer a municipal water system with alternate points of diversion. Pocatello disagrees with IDWR's position on the condition in the abstract but, more importantly, Pocatello's challenge addresses the condition as it has been applied to Pocatello's unique factual situation. The Providers' Amicus Brief does not address factual issues which leave Pocatello without access to operating wells and senior water rights during times of administration. Nor does the Amicus Brief address the operation of the condition when there is no change in the

November 19, 1987 well capacity, only a change in the number of hours the well is operated (diverted volume).

The Providers' Amicus Brief begins with four wells with a combined capacity of 4000 gpm. The Providers' scenarios presume the four wells can increase their combined capacity to 16,000 gpm without an approved transfer. Pocatello's record begins and ends with 22 wells with individual capacities totaling 95.49 cfs to 100.34 cfs. The only changes in these individual capacities would occur with notice to other ground water users through the IDWR transfer process.

Dated this 20th day of July 2009.

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Attorneys for the City of Pocatello

By 
Josephine P. Beeman

Attachment (30 subcases)

29-00271
29-00272
29-00273
29-02274
29-02338
29-02401
29-02499
29-04221
29-04222
29-04223
29-04224
29-04225
29-04226
29-07106
29-07118
29-07119
29-07322
29-07375
29-07450
29-07770
29-11339
29-11348
29-13558
29-13559
29-13560
29-13561
29-13562
29-13637
29-13638
29-13639

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of July 2009, I caused a true and correct copy of the foregoing document to be served on the following by U.S. Mail:

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Represented by:

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STATE OF IDAHO

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UNITED STATES OF AMERICA

Represented by:

US DEPARTMENT OF JUSTICE

ENVIRONMENT & NAT'L RESOURCES

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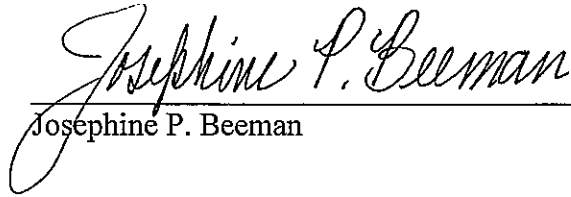
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CHART OF 30 WATER RIGHTS

Notice of Challenge	intown interconnected system 21 ground water rights		intown interconnected system 18 ground water rights		intown interconnected system 4 surface water rights		airport interconnected system 2 ground water rights	biosolids program 3 ground water rights	Alameda wells; Priority for 2 ground water rights
30 water rights	CFS		CFS		CFS				
29-02274	29-02274	9.69							
29-02338	29-02338	9.53							
29-02401	29-02401	12.22	29-02401	12.22					
29-02499	29-02499	4.10	29-02499	4.10					
29-04221	29-04221	2.67	29-04221	2.67					
29-04223	29-04223	.21	29-04223	.21					
29-04224	29-04224	3.89	29-04224	3.89					
29-04225	29-04225	4.44	29-04225	4.44					
29-04226	29-04226	.22	29-04226	.22					
29-07106	29-07106	3.90	29-07106	3.90					
29-07322	29-07322	17.06	29-07322	17.06					
29-07375	29-07375	2.23							
29-11339	29-11339	3.36	29-11339	3.36					
29-11348	29-11348	4.90	29-11348	4.90					
29-13558	29-13558	1.34	29-13558	1.34					29-13558
29-13559	29-13559	.96	29-13559	.96					
29-13560	29-13560	9.13	29-13560	9.13					
29-13561	29-13561	4.23	29-13561	4.23					
29-13562	29-13562	2.45	29-13562	2.45					
29-13637	29-13637	4.46	29-13637	4.46					
29-13639	29-13639	3.68	29-13639	3.68					29-13639
29-00271					29-00271	3.22			
29-00272					29-00272	.56			
29-00273					29-00273	1.218			
29-04222					29-04222	5.00			
29-7450							29-7450		
29-13638							29-13638		
29-7118							29-7118		
29-7119							29-7119		
29-7770							29-7770		
TOTALS		104.67		83.22		9.998			

33 Wells Well # Gone Active	Date drilled and redrilled	Rate of Diversion – Nov 19, 1987				Town ship	Ran ge	Sec- tion	QQ
		2003 Cond 22 wells	2006 cond 31 wells	2007 cond 25 wells	Stipulation 23 wells				
1	12/31/1926		2.45	2.45		7S	34E	1	NWNE
2	12/31/1926	3.12	2.45	2.45	3.12	7S	34E	1	NWNE
2	6/15/1948		.67	missing		7S	34E	1	NWNE
3	12/31/1926	4.23	4.23	4.23	4.46	7S	34E	1	SWNE
4	8/31/1931		4.23	4.23		6S	34E	35	NWSE
5	10/1933 replaced 1			Replaced 1		6S	34E	35	NWSE
6	12/31/1936		2.45	2.45		6S	34E	35	NWSE
7	12/31/1940	4.46	4.46	4.46	4.46	6S	34E	35	NWNE
8	6/15/1948		2.67			6S	34E	15	NWSW
9	6/15/1948		1.00			6S	34E	27	NWSE
10	6/15/1948	5.35	5.35	missing	6.23	6S	34E	26	NENW
12	9/1/1953	6.20	6.20	missing	6.20	6S	34E	35	SENE
13	9/1/1953	2.22	2.22	missing					
13	10/16/1958	0.89	.89	.89	3.11	7S	34E	1	SESE
14	12/31/1955	0.22	.22	.22	2.23	7S	35E	7	NESW
15	9/1/1953	1.11	1.11	missing					
15	2/24/1977	2.23	2.23	missing	3.34	7S	35E	6	NWSE
16	10/16/1958	6.67	6.67	6.67	6.67	6S	34E	26	SWSE
18	10/16/1958	4.66	4.66	4.66	4.66	6S	34E	15	NENW
21	9/15/1955	3.89	3.89	3.89	3.89	6S	34E	23	SWNE
22	10/22/1952	3.68	3.68	3.68	3.68	6S	34E	23	SENW
23	8/15/1956	4.44	4.44	4.44	4.44	6S	34E	23	NWNE
26	6/1/1945	2.67	2.67	2.67	2.67	6S	34E	15	NWNE
27	12/10/1964	4.10	4.10	4.10	4.90	6S	34E	14	NWNW
28	8/31/1951	4.90	4.90	4.90	4.90	7S	34E	1	NESE
29	11/6/1972	6.20	3.90	3.90	4.01	6S	34E	23	NESW
30	4/25/1976	5.57	5.57	5.58	6.23	6S	34E	35	NWNE
31	4/25/1976	8.02	8.02	8.03	8.02	6S	34E	15	NESE
32	4/25/1976	3.45	3.45	3.46	3.45	6S	34E	16	NENE
33	10/1/1962	0.21	.21	.21	2.67	7S	35E	18	SENE
34	2/18/1985	7.00	7.00	missing	7.00	6S	34E	15	NESE
44					4.46	7S	35E	16	SWSW
Alameda 1			1.34	1.34					
Alameda 2			0.96	0.96					
Alameda 6			1.70	1.70					
Alameda 7			1.66	1.66					
Cfs by: list, active, gone, missing active, net diff among active wells		2003 22wells=95.49 22active=95.49	2006 v. 2003 31wells=111.65 22active=93.19 9 gone = 18.46 -2.3= net diff among active wells 2006 v. 2003	2007 v. 2003 25 wells=83.23 18active=68.44 7 gone =14.79 Missing=24.78 (well or incr in capacity) -2.27= net diff among active wells '07v'03	Stip v. 2003 23wells=104.8 23active=104.8 well 44=4.46 +4.85= net diff among active wells stip v'03				
Total cfs		95.49 2003	93.19 active +2.30 well diff 95.49 2003	68.44 active +24.78 missing 93.22 +2.27welldiff 95.49 2003	104.80 active -4.46 well 44 100.34 -4.85welldiff 95.49 2003				

Appendix B