# BEFORE THE DIVISION OF WATER RESOURCES KANSAS DEPARTMENT OF AGRICULTURE

Pursuant to K.S.A. 82a-1041.	) )	
in Wichita County, Kansas	)	001 – DWR-LEMA – 2020
Wichita County Local Enhanced Management Area	)	
In the Matter of the Designation of the	)	

# ORDER OF DECISION ACCEPTING THE MANAGEMENT PLAN FOR THE WICHITA COUNTY LOCAL ENHANCED MANAGEMENT AREA

The above-captioned matter came before the Chief Engineer of the Division of Water Resources, Kansas Department of Agriculture ("Chief Engineer"), for a second and final public hearing regarding the acceptance of the management plan for the Wichita County Local Enhanced Management Area ("WHC LEMA") on November 20, 2020, at 9:00 a.m. Such proceeding was held pursuant to K.S.A. 82a-1041(b) and (c). For the reasons set forth below, the Chief Engineer hereby accepts the WHC LEMA Management Plan as sufficient to address the conditions set forth in K.S.A. 82a-1036, and consequently an Order of Designation shall follow this Order of Decision within a reasonable amount of time prescribing corrective control provisions and related matters.

## I. Procedural Background

- On March 26, 2020, the Western Kansas Groundwater Management District No. 1 ("GMD 1") submitted a formal request for the establishment of the WHC LEMA beginning on January 1, 2021, and ending on December 31, 2025.
- 2. On April 7, 2020, the Chief Engineer reviewed the proposed local enhanced management plan. (Exhibit A). Pursuant to K.S.A. 82a-1041(a), the Chief Engineer found that the plan proposed clear geographic boundaries, pertained to an area wholly within a groundwater management

- district, proposed appropriate goals and corrective control provisions to meet the stated goals, gave due consideration to existing conservation measures, included a compliance monitoring and enforcement element, and is consistent with state law.
- Pursuant to K.S.A. 82a-1041(b), timely notice of the initial public hearing was mailed to each
  water right owner located within the boundaries of the proposed WHC LEMA and published
  in the Wichita County Native Sun on July 15, 2020, and the Scott County Record on July 16,
  2020.
- 4. Pursuant to the Pre-Hearing Order, the Chief Engineer presided over the initial public hearing on August 14, 2020, to determine if the initial requirements contained in K.S.A. 82a-1041(b) were satisfied. During the initial public hearing, oral testimony was accepted via Zoom and inperson at the St. Anthony Catholic Church Parish Hall at Leoti, Kansas. Written testimony was accepted in advance of the hearing and the record was held open until August 28, 2020, to allow submission of additional written testimony. The record of the initial public hearing was closed on August 28, 2020. Based on all testimony entered into the record and the applicable law, the Chief Engineer concluded that the WHC LEMA Management Plan satisfied the three initial requirements as set forth in K.S.A. 82a-1041(b)(1)-(3).
- 5. Pursuant to K.S.A. 82a-1041(b), timely notice of the second public hearing was mailed to each water right owner located within the boundaries of the proposed WHC LEMA and published in the Wichita County Native Sun on October 14, 2020, and the Scott County Record on October 15, 2020.
- 6. Pursuant to the Pre-Hearing Order, the Chief Engineer presided over the second public hearing on November 20, 2020, to consider whether the corrective control provisions in the WHC LEMA Management Plan are sufficient to address any of the existing conditions set forth in

K.S.A. 82a-1036(a)-(d) and whether the WHC LEMA Management Plan shall be accepted or rejected, or if modifications should be proposed. Oral testimony was accepted during the second public hearing via Zoom and in-person at the St. Anthony Catholic Church Parish Hall at Leoti, Kansas. Written testimony was accepted in advance of the hearing and the record was held open until December 4, 2020, to allow submission of additional written testimony. The record of the second public hearing was closed on December 4, 2020.

# II. Applicable Law

- 1. The formation of a local enhanced management area is governed pursuant to K.S.A. 82a-1041.
  When the Chief Engineer finds that a local enhanced management plan submitted by a groundwater management district is acceptable for consideration, then the Chief Engineer shall initiate proceedings to designate a local enhanced management area as soon as practicable.
- 2. Once the proceedings are initiated, the Chief Engineer shall hold an initial public hearing to resolve the following:
  - a. Whether one or more of the circumstances specified in K.S.A. 82a-1036(a)
     through (d), and amendments thereto, exist;
  - b. Whether the public interest of K.S.A. 82a-1020, and amendments thereto, requires that one or more corrective control provisions be adopted; and
  - c. Whether the geographic boundaries are reasonable.
- 3. The following circumstances are specified in K.S.A. 82a-1036(a) through (d):
  - a. Groundwater levels in the area in question are declining or have declined excessively;
  - b. The rate of withdrawal of groundwater within the area in question equals or exceeds the rate of recharge in such area;

- Preventable waste of water is occurring or may occur within the area in question; or
- d. Unreasonable deterioration of the quality of water is occurring or may occur within the area in question.
- 4. K.S.A. 82a-1020 recognizes that it is in the interest of the public to create "special districts for the proper management of the groundwater resources of the state; for the conservation of groundwater resources; for the prevention of economic deterioration; for associated endeavors within the state of Kansas through the stabilization of agriculture; and to secure for Kansas the benefit of its fertile soils and favorable location with respect to national and world markets. It is the policy of this act to preserve basic water use doctrine and to establish the right of local water users to determine their destiny with respect to the use of the groundwater insofar as it does not conflict with the basic laws and policies of the state of Kansas."
- 5. K.S.A. 82a-1041(b)(3) directs the Chief Engineer to conduct a subsequent hearing only if the initial public hearing is favorable on all three issues of fact and the expansion of geographic boundaries is not recommended.
- 6. K.S.A. 82a-1041(c) limits the subject of the second hearing to the local enhanced management plan that the Chief Engineer previously reviewed.
- 7. K.S.A. 82a-1041(d) requires the Chief Engineer to issue an order of decision within 120 days that either:
  - a. Accepts the local enhanced management plan as sufficient to address any
    of the conditions set forth in K.S.A. 82a-1036(a)-(d);
  - Rejects the local enhanced management plan as insufficient to address any
    of the conditions set forth in K.S.A. 82a-1036(a)-(d);

- c. Returns the local enhanced management plan to the groundwater management district, giving reasons for the return and providing the district with the opportunity to resubmit a revised plan for public hearing within 90 days of the return of the deficient plan; or
- d. Returns the local enhanced management plan to the groundwater management district and proposes modifications to the plan, based on testimony at the hearing or hearings, that will improve the administration of the plan, but will not impose reductions in groundwater withdrawals that exceed those contained in the plan. If the groundwater management district approves the modifications proposed by the Chief Engineer, the district shall notify the Chief Engineer within 90 days of receipt of return of the plan. Upon receipt of the groundwater management district's approval of the modifications, the Chief Engineer shall accept the modified local enhanced management plan. If the groundwater management district does not approve the modifications proposed by the Chief Engineer, the local enhanced management plan shall not be accepted.
- 8. Pursuant to K.S.A. 82a-1041(e), if the Chief Engineer issues an Order of Decision accepting the local enhanced management plan, then an Order of Designation that designates the area in question as a local enhanced management area shall be issued within a reasonable time following the Order of Decision.

# III. Testimony Submitted in Accordance with the Hearing Procedure

- 1. The record of the initial public hearing in this matter has been incorporated into the record for this second public hearing. (*Transcript*, <sup>1</sup> pp. 10-11).
- 2. Frank Mercurio, a member of the Wichita County Water Conservation Area Team and a member of the Upper Smoky Hill Regional Advisory Committee, submitted written testimony prior to the hearing in support of the WHC LEMA Management Plan. Mr. Mercurio's testimony discussed the decreasing groundwater supply in the aquifer and the establishment of the Wichita County Water Conservation Area Team ("Team"). He outlined the educational efforts undertaken by the Team, the subsequent development of the Wichita County Water Conservation Area ("WCA"), and the conservation efforts of the Wichita County WCA. Mr. Mercurio explained that while the corrective control provisions of the Wichita County WCA are more stringent than the WHC LEMA Management Plan, the proposed corrective control provisions will be effective in helping conserve water. Finally, Mr. Mercurio addressed concerns with the anticipated economic impact of the WHC LEMA Management Plan. He provided examples where conservation tools were established and expressed that the economic viability in those areas was maintained or improved. Finally, Mr. Mercurio stated that since the corrective control provisions of the WHC LEMA Management Plan will be applied uniformly to irrigation water rights, any potential impact would also be uniform. (Written *Testimony of Frank Mercurio*, pp. 1-3; *Transcript*, p. 55).
- 3. Prior to the hearing, written testimony was submitted by Don Smith, Earl Smith, Luke Smith and Andrew Smith, representatives of Smith Family Farms. The Smiths are irrigators in Wichita County, Kansas who participate in the LEAD Water Conservation Area ("LEAD")

<sup>&</sup>lt;sup>1</sup> Any reference to "*Transcript*" shall mean the transcript from the second public hearing conducted on November 20, 2020.

WCA"). The testimony submitted by Smith Family Farms expressed support for irrigation management; identified conflicts between the LEAD WCA and the WHC LEMA Management Plan; and noted their prior request to GMD 1 to exclude existing water conservation areas from the WHC LEMA Management Plan. Additionally, the testimony outlined concerns with the appeal process and the allocation basis of the WHC LEMA Management Plan. (*Written Testimony of Don Smith, Earl Smith, Luke Smith and Andrew Smith*, pp. 1-3; *Transcript*, p. 55).

- 4. Prior to the hearing, written testimony was submitted on behalf of the Leoti Governing Body by Charlie Hughes, mayor of the City of Leoti. The testimony recommended support for the WHC LEMA Management Plan since reductions in water usage will help extend the useful life of the aquifer for the long-term benefit of Wichita County. (*Written Testimony of Charlie Hughes*, p. 1; *Transcript*, p. 55).
- 5. Kyle Spencer, Manager of GMD 1, submitted written testimony on behalf of GMD 1 prior to the hearing, provided oral testimony during the hearing, and submitted additional testimony after the second public hearing. (Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-80; Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-5; Second Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-2; Oral Testimony of Kyle Spencer, Transcript, pp. 13-37).

Mr. Spencer provided a history and overview of the relevant Kansas statutes, the previous actions taken in this proceeding, and a discussion on various aspects of the WHC LEMA Management Plan. Mr. Spencer's testimony explained that the WHC LEMA Management Plan calls for improved management of water within the townships located in

Wichita County, Kansas that are within the boundaries of GMD 1. The WHC LEMA Management Plan limits the withdrawal of groundwater for irrigation purposes to 246,882.786 acre-feet during the five-year period of January 1, 2021 through December 31, 2025. Under the proposed allocations of the WHC LEMA Management Plan, an irrigation water right's allocation would not result in a reduction of more than 25% from the average use during 2009-2015. (Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-7; Oral Testimony of Kyle Spencer, Transcript, pp. 13-19).

Mr. Spencer included references to Brownie Wilson's testimony from the initial hearing and the data from the Kansas Geological Survey ("KGS") report which determined that a 20.02% reduction in the average annual groundwater withdrawals from the aquifer should stabilize the groundwater levels for the coming decade or two. Furthermore, it is estimated that if the allocations in the WHC LEMA Management Plan are fully utilized over the five-year period, the average water use during 2021-2025 will be approximately 14.7% less than the 2009-2015 average water use. KGS provided GMD 1 with additional information after the second public hearing which discussed the aquifer's saturated thickness and the anticipated useful life of the aquifer. According to the information from KGS, the aquifer's saturated thickness in Wichita County ranges from approximately 10 feet to 30 feet, with an average of 21 feet. In order to answer how long the aquifer's useful life will be extended if the WHC LEMA is established, KGS evaluated the minimum saturated thickness required before irrigation usage is no longer practical. KGS determined that a saturated thickness of 15 feet may allow irrigation to continue if low-yielding wells are chained together, the pumping season is extended, and irrigators utilize the latest conservation technologies and practices. If the 2009-2015 average level of water use continues, it is projected that the aquifer's saturated

thickness will be reduced by approximately 25%, to an average of 15 feet, within seven years. However, if groundwater withdrawals are reduced by 14.7% and assuming the water flowing into the aquifer remains at the current rate, the time for the aquifer to be reduced to a saturated thickness of 15 feet is extended from seven to 16 years. Thus, the corrective control provisions of the WHC LEMA Management Plan will accomplish a significant part of the reductions needed to address the depletion of groundwater in the area. (Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 6-8; Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-2; Oral Testimony of Kyle Spencer, Transcript, pp. 18-21).

Mr. Spencer discussed how the WHC LEMA Management Plan will meet its stated goal of reducing withdrawals of groundwater by irrigation water rights; how the corrective control provisions will be effective in meeting that goal; and how such provisions will help extend the useful life of the aquifer for future use. Mr. Spencer described provisions of the WHC LEMA Management Plan and clarified that water right owners may exceed a water right's average annual LEMA allocation so long as the water right's annual authorized quantity is not exceeded. Irrigation water rights are provided a five-year allocation which will allow water right owners to plan the best use of each allocation. Mr. Spencer advised that the WHC LEMA Management Plan recommends any unused allocation be carried over into a subsequent LEMA, without being subject to an additional conservation factor. Mr. Spencer further explained that the WHC LEMA Management Plan authorizes the creation of combined well units to permit water right owners to move water allocations between wells that are physically tied together if water is diverted from the same source of supply. Additionally, Mr. Spencer clarified that vested water rights are not subject to the corrective control provisions of the WHC

LEMA Management Plan, but vested water rights may be combined with other water rights if those vested water rights are voluntarily enrolled in the WHC LEMA Management Plan. (Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 4-6 and 17; Oral Testimony of Kyle Spencer, Transcript, pp. 15-17 and 32).

Mr. Spencer testified about the appeal process and noted that it was reasonably tailored to provide due consideration to those water right owners that previously implemented voluntary conservation measures, protects property rights, and ensures that the goals of the WHC LEMA Management Plan can be met. Mr. Spencer advised that it is difficult to quantify the number of appeals that may occur, but GMD 1 expects the impact of any such appeals to be minimal. The WHC LEMA Management Plan will allow a water right owner to appeal an allocation for any of the following reasons: to ensure that due consideration is given for prior conservation efforts; to address an improper calculation of an allocation or the water use history upon which the calculation was based; or to establish an allocation based on a flow rate test if the water right is on land not owned, leased, rented, or otherwise previously controlled or pumped during 2009-2015 by the owner as of January 1, 2020. While the appeal process could result in allocations greater than the stated goal, GMD 1 anticipates additional conservation above the stated goal due to various counterbalancing considerations. Such counterbalancing considerations include the following:

- a. the likely inability of vested water rights to pump 100% of their annual authorized quantity;
- that water right owners may voluntarily enroll their vested water rights in conservation tools such as the WHC LEMA Management Plan or a Water Conservation Area;

- c. that water right owners are currently participating in existing voluntary conservation tools that require conservation beyond what is required in the WHC LEMA Management Plan;
- d. that water right owners may not utilize 100% of their allocation or may undertake additional conservation efforts;
- e. that the inclusion of drought years in the historical use period provides additional flexibility to water right owners during the five-year period; and
- f. that the temporary nature of the WHC LEMA Management Plan will permit future modifications if a subsequent LEMA is established after the initial five-year period.

Mr. Spencer also noted that an appeal allocation will only be granted to the extent that a pump test can demonstrate that water can actually be pumped; that the appeal allocation will only be applied to the specific years that were appealed; and that any additional allocations will not necessarily correspond to an increased use of the same amount of water. (*Written Testimony of the Western Kansas Groundwater Management District No. 1*, pp. 7-12; *Oral Testimony of Kyle Spencer*, *Transcript*, pp. 18-26).

Mr. Spencer's testimony explained that while non-irrigation water rights are not subject to the corrective control provisions established in the WHC LEMA Management Plan, the management plan includes recommendations for stock, municipal, and industrial water rights. Additionally, the WHC LEMA Management Plan explicitly provides recommendations for domestic water rights. During 2009-2015, the withdrawal of groundwater by non-irrigation water rights was minimal, 3.6%; as compared to 96.4% by irrigation water rights. Mr. Spencer advised that GMD 1 elected to only provide recommendations for non-irrigation water rights

because the corrective control provisions in the WHC LEMA Management Plan are reasonably calculated to achieve the goal of reducing groundwater withdrawals from the aquifer and will help preserve the aquifer for future use. The WHC LEMA Management Plan includes a monitoring component and, if as a result of the monitoring, it is determined that an increase in the use of water is occurring by such non-irrigation water rights, GMD 1 can modify any subsequent LEMA management plan to address such usage. Mr. Spencer discussed that the WHC LEMA Management Plan was developed to minimize economic disruption in Wichita County, and that stock and industrial users are common and primary economic drivers that often consume the commodities created by the irrigation water rights. (Written Testimony of the Western Kansas Groundwater Management District No. 1, p. 13; Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, p. 1; Oral Testimony of Kyle Spencer, Transcript, pp. 26-28).

Mr. Spencer also testified regarding the provisions in the WHC LEMA Management Plan that consider priority of water rights. Explicit in the WHC LEMA Management Plan is the exemption of vested water rights and a provision that the Chief Engineer is expected to investigate any claim of impairment and address any such impairment, thus providing consideration of priority. Additionally, Mr. Spencer opined that the WHC LEMA Management Plan considers priority of water rights through its implementation of the corrective control provisions because the reduction of groundwater withdrawals will help stabilize the aquifer which should delay or reduce potential impairment claims. (Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 14-15; Oral Testimony of Kyle Spencer, Transcript, pp. 28-29).

Mr. Spencer summarized the compliance monitoring and enforcement elements of the WHC LEMA Management Plan and explained that such provisions are consistent with existing Kansas law. As such, the WHC LEMA Management Plan does not impose additional monitoring requirements or penalties upon water right owners. Additionally, a Review Board will annually review the status of the WHC LEMA Management Plan. Furthermore, Mr. Spencer affirmed that GMD 1 will review the economic impact of the WHC LEMA Management Plan and will assist researchers interested in evaluating the WHC LEMA Management Plan. (Written Testimony of the Western Kansas Groundwater Management District No. 1, p. 16; Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, p. 2-3; Oral Testimony of Kyle Spencer, Transcript, pp. 30-31).

In response to testimony presented during the second public hearing, Mr. Spencer clarified various aspects of the WHC LEMA Management Plan, and the decisions made by GMD 1's Board of Directors during the development of the management plan. Mr. Spencer's testimony discussed the projections of the usable life of the aquifer and how long the life of the aquifer will be extended if the WHC LEMA Management Plan is established; how GMD 1 intends to evaluate the economic impact and implementation of the WHC LEMA Management Plan; the appeal process of the WHC LEMA Management Plan, including the rationale for the appeal deadline of March 1, 2022, and the rationale and sufficiency of the 150-day multiplier in the flow rate test. Furthermore, Mr. Spencer explained the rationale for the historical-use allocation; the justification for the boundaries of the WHC LEMA Management Plan; and addressed the concerns presented by the testimony of Don Smith, Earl Smith, Luke Smith and Andrew Smith, representatives of Smith Family Farms. (Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-

- 5; Second Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-2).
- 6. Lane Letourneau, Water Appropriation Program Manager, Division of Water Resources ("DWR"), Kansas Department of Agriculture, submitted written testimony prior to the hearing and provided oral testimony during the hearing in support of the WHC LEMA Management Plan. Mr. Letourneau advised that the data from KGS utilized in the development of the WHC LEMA Management Plan is reliable; that the corrective control provisions in the WHC LEMA Management Plan are reasonable, narrowly tailored, and in the public interest; and that the corrective control provisions will be effective to slow the depletion of groundwater. Mr. Letourneau summarized provisions of the WHC LEMA Management Plan and addressed various concerns that were raised during the public hearings. Mr. Letourneau explained that the corrective control provisions of the WHC LEMA Management Plan conform with existing state laws and policies relating to water use and conservation, including the doctrine of prior appropriation. Mr. Letourneau testified that even though the allocations in the WHC LEMA Management Plan are not based on the priority date of the water rights, should any impairment complaints be received by DWR, an impairment investigation would be conducted, and, if necessary, any junior water rights would be curtailed as required to secure the senior water right. Mr. Letourneau stated that DWR believes that the implementation of the WHC LEMA Management Plan will help preserve the aquifer for future use, thus providing long-term benefits to the local economy. Finally, Mr. Letourneau lauded the efforts taken to extend the useful life of the aquifer and support the agricultural-driven economy of Wichita County. (Written Testimony of Lane Letourneau, pp. 1-2; Oral Testimony of Lane Letourneau, *Transcript*, pp. 37-42).

- 7. Mike Meyer, Water Commissioner of the Garden City Field Office, Division of Water Resources, Kansas Department of Agriculture, submitted written testimony prior to the hearing and provided oral testimony during the hearing. Mr. Meyer explained the role of DWR during the WHC LEMA process; noted that DWR staff reviewed and analyzed the data used in the development of the WHC LEMA Management Plan; and that DWR will assist GMD 1 with the administration of the WHC LEMA Management Plan. Mr. Meyer testified that the 25% reduction from historical use is reasonable and that DWR believes the WHC LEMA Management Plan can achieve its stated goals. (Written Testimony of Mike Meyer, p. 1; Oral Testimony of Mike Meyer, Transcript, pp. 42-44).
- 8. Brian W. Bauck, an irrigator in Wichita County, provided oral testimony during the hearing and written testimony after the hearing. Mr. Bauck stated that he supports conservation and irrigation management to extend the useful life of the aquifer but has various concerns with the WHC LEMA Management Plan. Mr. Bauck explained his concerns with the appeal process and opined that a significant number of appeals will result. Mr. Bauck indicated a preference for an acre-inch allocation and considered it a more straightforward approach than the historical-use allocation proposed in the WHC LEMA Management Plan. Mr. Bauck further testified that he believes the LEMA boundaries should be expanded to encompass all of GMD 1. Finally, Mr. Bauck expressed concern that the development of the WHC LEMA Management Plan was driven by a small number of irrigators trying to implement the requirements of their water conservation areas upon other irrigators. (Written Testimony of Brian W. Bauck, Transcript, pp. 47-49).
- 9. Frank Wedel, a resident of Leoti, Kansas, provided oral testimony in support of the WHC LEMA Management Plan. Mr. Wedel recounted his recent observations about various cities

located in Western Kansas, including the viability of such cities and their dependency on water to sustain their economies. Mr. Wedel discussed his children, their businesses, and the dependency upon water to sustain such businesses and the local economy. Finally, Mr. Wedel expressed a desire that his grandchildren be given the opportunity to be a part of the Leoti community in the future. (*Oral Testimony of Frank Wedel, Transcript*, pp. 45-47).

- 10. Tammy Simons, a farmer and rancher in Wichita County, Kansas and a member of the Leoti-Wichita County Board of Education, provided oral testimony in support of the WHC LEMA Management Plan. Ms. Simons explained that she represents the fourth and fifth generations of her family involved in agriculture and that she has been involved in conservation efforts since the Wichita County WCA meetings in 2016. Ms. Simons testified about the National Geographic Magazine article discussing the Ogallala Aquifer and the attention its depletion has garnered; outlined select provisions of the WHC LEMA Management Plan; and discussed the relationship between water, the agricultural-based economy of Wichita County, and the viability of the community. Ms. Simons encouraged even greater conservation efforts to attain the withdrawal reductions identified by KGS as necessary to stabilize the aquifer. Finally, Ms. Simons stated that conservation efforts are necessary for the immediate future of the community and for future generations. (*Oral Testimony of Tammy Simons, Transcript*, pp. 49-54).
- 11. Subsequent to the hearing, written testimony was submitted by Mike Hunter, a representative of Green Plains Cattle Company. Mr. Hunter advised that Green Plains Cattle Company operates a cattle feeding facility in Wichita County and others across southwest Kansas. Mr. Hunter's testimony addressed the importance of agriculture and water in western Kansas; the operation of the cattle feeding facility, including the purchase of local commodities, the

facility's use of water, and the facility's investment in water management upgrades. Mr. Hunter discussed the relationship between extending the useful life of the aquifer and the continued economic viability of the area. Mr. Hunter detailed the public support for such conservation efforts and noted that the public interest will be served by the implementation of the WHC LEMA Management Plan. (*Written Testimony of Mike Hunter*, p. 1).

- 12. Subsequent to the hearing, written testimony was filed by Ray Smith, Board Member of GMD 1. Mr. Smith discussed his voluntary participation in water conservation areas and noted the difficulty in determining allocations in a LEMA management plan. Mr. Smith's testimony expressed concern with the appeal process of the WHC LEMA Management Plan and felt that the 150-day multiplier in the flow rate test may be too high, and, as a result, the corrective control provisions may not be sufficient to extend the useful life of the aquifer. (*Written Testimony of Ray Smith*, p. 1).
- 13. Subsequent to the hearing, written testimony was filed by Richard Felts on behalf of Kansas Farm Bureau. The testimony of the Kansas Farm Bureau expressed concern that the WHC LEMA Management Plan may not be consistent with existing state law, including the Kansas Water Appropriation Act and the Groundwater Management District Act. The testimony alleged that the WHC LEMA Management Plan is inconsistent with state law because the allocations were not based on priority of water rights and only irrigation water rights are subject to the corrective control provisions of the management plan. Additionally, the testimony questioned if the corrective control provisions of the WHC LEMA Management Plan diminish private property rights. (Written Testimony of Richard Felts, pp. 1-2).
- 14. Subsequent to the hearing, written testimony was filed on behalf of the Kansas Water Office by Cara Hendricks, Acting Director. The testimony of the Kansas Water Office discussed the

water planning activities for the State of Kansas and how the WHC LEMA Management Plan supported certain goals and objectives of those water planning activities. Additionally, the Kansas Water Office expressed its support for the local efforts to conserve and extend the useful life of the aquifer. (*Written Testimony of Cara Hendricks*, p. 1).

## IV. <u>Discussion</u>

- 1. Prior to the issuance of an Order of Designation, it is appropriate to address the concerns included in the testimony recounted above.
- 2. Concerns were expressed about whether the WHC LEMA Management Plan is consistent with existing state law, including the doctrine of prior appropriation. The allocations in the WHC LEMA Management Plan are not based upon priority of water rights, except vested water rights are exempt from the provisions of the WHC LEMA Management Plan. The LEMA statute does not require allocations in a LEMA management plan to be based on priority—it permits groundwater management districts to address the depletion of groundwater in a creative, locally-driven manner. K.S.A. 82a-1041 allows for reductions to address specific problems, and provides the flexibility to implement LEMA management plans that adequately address such problems while still protecting senior water rights. For example, K.S.A. 82a-1041(f) allows for the use of four specific corrective control provisions plus any additional requirements that the public interest may require. Of these, the only mention of priority is in K.S.A. 82a-1041(f)(2), which relates to determining the total permissible withdrawal in an area apportioned "insofar as may be reasonably done" with the relative dates of priority. Additionally, K.S.A. 82a-1041(f)(3) explicitly allows for "reducing the permissible withdrawal of groundwater by any one or more appropriators..." (emphasis added). It is also important to note that K.S.A. 82a-707(b) provides that the priority to use water comes into

effect when the "supply is not sufficient to satisfy all water rights." The implementation of the WHC LEMA Management Plan is an attempt to address the well-documented regional lowering of the aquifer and not impairment of senior water rights by junior water rights. Here, the strict use of priority in determining allocations could result in significant individual economic harm to junior water right holders while providing little additional benefit to some senior right holders due to variability of the saturated thickness of the aquifer across Wichita County without providing any of the assumed protections (supply of water) that go along with administering strictly according to priority. Of the testimony received in this proceeding, only one entity mentioned that allocations in the WHC LEMA Management Plan should be based on priority of water rights. However, the local community did not express an interest in priority-based allocations, and despite the allocations not being based upon priority, the WHC LEMA Management Plan is consistent with state law. As such, it was reasonable for the GMD 1 Board of Directors to use additional factors when determining allocations in the WHC LEMA Management Plan. Further, as testimony by DWR staff shows, priority is still the fundamental consideration if impairment between two water rights occurs. In such case, the prior appropriation doctrine will be used to secure water to the senior appropriator. Finally, this legal concern was previously resolved in the Memorandum Decision issued in Friesen v. Barfield, 2018 CV 10, Gove County District Court (October 15, 2019). The Memorandum Decision stated, "[h]ad the Legislature meant for the prior appropriation to apply to LEMA's and IGUCA's then there would have been mention of it within the statute. Instead, the Legislature authorized the corrective controls that directly and unambiguously contravene with the prior appropriation doctrine." Id. at 24. For all these reasons, the WHC LEMA Management Plan is

- consistent with existing state law, including the Kansas Water Appropriation Act and the Groundwater Management District Act.
- 3. Testimony received in this proceeding included concerns that the corrective control provisions of the WHC LEMA Management Plan only address one type of use (irrigation) without also imposing restrictions on other types of use. As previously discussed, the WHC LEMA Management Plan provides an allocation for irrigation water rights while non-irrigation water rights are not subject to the corrective control provisions of the management plan. Nonirrigation water rights are not provided allocations, nor are they required to reduce their use the WHC LEMA Management Plan simply includes recommendations for those users. For the same reasons discussed above relating to the doctrine of prior appropriation, it is also reasonable to exclude non-irrigation water rights from specific allocations under the WHC LEMA Management Plan. The Memorandum Decision issued in *Friesen v. Barfield*, 2018 CV 10, Gove County District Court (October 15, 2019) also addressed this concern. In that case, where non-irrigation uses also constituted a tiny fraction of total use, GMD 4's LEMA Management Plan only provided allocations to irrigation water rights and did not regulate the other types of use. In the Memorandum Decision, the Gove County District Court found that a LEMA Management Plan which only regulates one type of water use is permissible and does not violate the equal protection standards of the Federal and State Constitutions. *Id.* at 16. The WHC LEMA Management Plan was created to address depletion of groundwater and it is reasonable for the corrective control provisions to regulate irrigation water rights because the irrigation water rights account for 96.4% of the groundwater withdrawals from the aquifer. The goal of reducing groundwater withdrawals can be met through corrective control provisions directed at irrigation water rights and is a logical and rational way to fulfill the purpose of the

LEMA statute and the WHC LEMA Management Plan. For all these reasons, the WHC LEMA Management Plan is consistent with existing state law, including the Kansas Water Appropriation Act and the Groundwater Management District Act.

4. Additionally, concerns were expressed regarding the boundaries of the WHC LEMA; how the allocation basis was determined; and various issues with the appeal process of the WHC LEMA Management Plan. Ultimately, each issue was evaluated by GMD 1's Board of Directors and the provisions in the WHC LEMA Management Plan were developed based on local input. For the reasons discussed below, it is appropriate to give deference to the decisions made by GMD 1's Board of Directors when it developed the WHC LEMA Management Plan.

Regarding the WHC LEMA boundaries, it is important to note that the issue was discussed during the initial public hearing and the Chief Engineer determined that the boundaries were reasonable. (See generally, Findings and Order Establishing the Initial Requirements for the Designation of a Local Enhanced Management Area). Although the aquifer and the movement of water through it are not affected by township, county, or GMD boundaries; for practical and administrative reasons, the Board of Directors elected to focus its resources in developing a LEMA management plan for Wichita County, an area that presents the greatest decline rates and has significant public support for conservation measures.

With respect to the allocation basis, some individuals indicated a preference for an allocation based on an acre-inch calculation instead of an allocation based on the pumping history of each water right. Mr. Spencer's written testimony discussed the basis for the allocations and factors that were considered when developing the allocations in the WHC LEMA Management Plan. (See generally, Second Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, p. 1). While there are other methods

for determining an allocation basis, GMD 1's Board of Directors determined that the proposed allocation basis was appropriate and includes a reasonable provision to give due consideration to water right owners that have previously implemented voluntary conservation measures.

Finally, specific concerns were raised regarding the appeal deadline of March 1, 2022; the inability to appeal the allocation if property is purchased after the deadline; the number of appeals that may result; the resources that will be utilized to address the appeals; whether the 150-day multiplier in the flow rate test is correct; and whether the timeline of the flow rate test is appropriate and provides water right owners with appropriate notice regarding their allocation under the WHC LEMA Management Plan. Mr. Spencer's written testimony addressed many of those concerns including the appeal deadline, the reasoning behind the 150-day multiplier in the flow rate test, and the appropriateness of the timeline for the flow rate test. (See generally, Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-18; Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-5; Second Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-2). GMD 1's Board of Directors determined the appeal process of the WHC LEMA Management Plan was sufficient.

The LEMA statute allows groundwater management districts and their members to control the destiny of their water use. In this case, GMD 1 submitted a request for the establishment of the WHC LEMA Management Plan, with the goal of limiting irrigation withdrawals. GMD 1's Board of Directors evaluated various methods and determined the provisions within the WHC LEMA Management Plan were the best means to achieve the stated goals. The decisions made by GMD 1's Board of Directors are reasonable, lawful, and appropriate and, as such, deference should be given to their decisions.

5. Finally, testimony received during the proceeding noted concerns about the economic impact that may result from the implementation of corrective control provisions, including whether the WHC LEMA Management Plan will devalue private property rights. As summarized above, various persons testified that the implementation of the corrective control provisions were necessary to extend the useful life of the aquifer, thus benefiting the economy. In particular, Mr. Spencer's testimony included excerpts from reports evaluating the impact of the Sheridan 6 LEMA and the Wet Walnut Creek IGUCA. (See generally, Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-80; Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-5; Second Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-2; Oral Testimony of Kyle Spencer, Transcript, pp. 13-37; Written Testimony of Frank Mercurio, pp. 1-3; Transcript, p. 55; Written Testimony of Lane Letourneau, pp. 1-2; Oral Testimony of Lane Letourneau, Transcript, pp. 37-42). While the economic impact of implementing corrective control provisions has not been clearly established, evidence from other areas that have implemented conservation tools has not shown a significant decline in profits or property values. It is likely that significant economic impacts will result if the depletion of groundwater continues unchecked. Corrective control provisions are necessary to extend the life of the aquifer and data from the KGS found that if the average water use from 2009-2015 continues, it is projected that the aquifer's saturated thickness will reach 15 feet within seven years. However, if withdrawals are reduced 14.7%, and assuming the amount of water coming into the aquifer remains constant, the remaining usable life of the aquifer should be doubled. (See generally, Supplement to Written Testimony of the Western Kansas Groundwater Management District No. 1, pp. 1-2). The corrective control provisions

in the WHC LEMA Management Plan will help ensure groundwater is available for all water rights into the future and provide long-term benefits to public health and welfare, and to the local economy.

## V. Findings of Fact

- 1. The order entitled *Findings and Order Establishing the Initial Requirements for the Designation of a Local Enhanced Management Area* is hereby adopted by reference and made a part of this record.
- 2. The proposed geographical boundaries of the WHC LEMA include the following sections in Wichita County, Kansas:

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Township 16S, Range 35W, Sections 1 through 36
Township 16S, Range 36W, Sections 1 through 36
Township 16S, Range 37W, Sections 1 through 36
Township 16S, Range 38W, Sections 1 through 36
Township 17S, Range 35W, Sections 1 through 36
Township 17S, Range 36W, Sections 1 through 36
Township 17S, Range 37W, Sections 1 through 36
Township 17S, Range 38W, Sections 1 through 36
Township 18S, Range 35W, Sections 1 through 36
Township 18S, Range 36W, Sections 1 through 36
Township 18S, Range 37W, Sections 1 through 36
Township 18S, Range 38W, Sections 1 through 36
Township 19S, Range 35W, Sections 1 through 36
Township 19S, Range 36W, Sections 1 through 36
Township 19S, Range 37W, Sections 1 through 36
Township 19S, Range 38W, Sections 1 through 36
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The WHC LEMA Management Plan proposes clear geographic boundaries and the boundaries of the WHC LEMA are located wholly within GMD 1.

3. Evidence shows there is a need for corrective control provisions in Wichita County, Kansas due to excessive declines in groundwater levels and a rate of withdrawal of groundwater that exceeds the rate of recharge.

- 4. The WHC LEMA Management Plan limits irrigation withdrawals within the WHC LEMA boundaries to 246,882.786 acre-feet for the period of January 1, 2021 through December 31, 2025. This five-year allocation, along with flexibility in how the allocation can be applied by water right owners, provides corrective control provisions which are sufficient to meet that goal.
- 5. The WHC LEMA Management Plan provides due consideration to water users that have previously implemented voluntary conservation measures.
- 6. The proposed WHC LEMA Management Plan provides for comprehensive accounting procedures and penalties for violations.

#### VI. Conclusions of Law

- 1. Notice of the initial public hearing and the second public hearing was proper and complied with the requirements of K.S.A. 82a-1041(b).
- 2. As determined by the *Findings and Order Establishing the Initial Requirements for the Designation of a Local Enhanced Management Area*, the initial requirements for the establishment of a LEMA were met during the initial public hearing.
- 3. The second public hearing took place according to the requirements of K.S.A. 82a-1041.
- 4. All other procedures required pursuant to K.S.A. 82a-1041 have been complied with in the formation and submittal of the WHC LEMA Management Plan.
- 5. In order to address excessive declines in the groundwater level and to address rates of withdrawal that exceed the rate of recharge as stated by K.S.A. 82a-1036, the public interest requires the establishment of corrective control provisions within Wichita County, Kansas.
- 6. A corrective control provision that only reduces the rate of decline, but does not prevent decline, is in the public interest as contemplated by K.S.A. 82a-1020.

7. Pursuant to K.S.A. 82a-1041(d)(1), the WHC LEMA Management Plan is sufficient to address

the excessive declines in groundwater levels and the rate of withdrawal of groundwater that

exceeds the rate of recharge in the area in question.

8. The WHC LEMA Management Plan is consistent with the Kansas Water Appropriation Act

and other Kansas law.

VII. Order of Decision

COMES NOW the Chief Engineer, who, based upon substantial competent evidence, as

provided by the testimony and comments offered at, or in relation to, all public hearings on this

matter, finds that the management plan for the Wichita County Local Enhanced Management Area

is sufficient to address the decline in groundwater levels in the area in question.

THEREFORE, the Chief Engineer, pursuant to K.S.A. 82a-1041(e)-(h), shall within a

reasonable time, enter a subsequent order of designation, which shall define the boundaries of the

WHC LEMA and include all necessary corrective control provisions.

ENTERED THIS 30th DAY OF DECEMBER, 2020.

Earl D. Lewis, Jr., P.E.

Chief Engineer

Division of Water Resources

Kansas Department of Agriculture

Prepared by:

Kelly Navsky-Weyl # 25480

Staff Attorney

Kansas Department of Agriculture

1320 Research Park Drive

Manhattan, Kansas 66502

Phone: (785) 564-6715

Fax: (785) 564-6777

Email: Kelly.NavinskyWenzl@ks.gov

# **Exhibits:**

Exhibit A: "GMD 1 Wichita County Local Enhanced Management Area" dated March 26, 2020.

**Exhibit B**: "Wichita County Local Enhanced Management Area (LEMA): Historical Use & Allocations."



## Request for a Wichita County LEMA Submitted to the Chief Engineer, Kansas Department of Agriculture, Division of Water Resources

#### March 26, 2020

#### I. Definitions

- a. "Annual Authorized Quantity or AAQ" The maximum amount of annual water use assigned to a Water Right by DWR when the Water Right was approved or certified, and as modified by any subsequently approved changes, terms or conditions.
- b. "Appropriation Water Rights" Pursuant to K.S.A. 82a -701(f), Water Rights that do not meet the conditions to be a Vested Water Right.
- c. "Board" The GMD1 Board of Directors.
- d. "Chief Engineer" The Chief Engineer of the Division of Water Resources, Kansas Department of Agriculture.
- e. "Comparison Years" The years, 2009 through 2015, used to determine Historical Usage of a point of diversion.
- f. "Conservation Factor" A 25% reduction applied to the Historical Usage for the calculation of a WHCL Allocation.
- g. "Combined Well Unit or CWU" Multiple wells diverting water from the same source of supply and physically tied together for the distribution of water prior to the starting date of the WHCL.
- h. "Domestic Water Rights"- Shall mean the same as KSA82a-701 (c).
- i. "DWR" Division of Water Resources, Kansas Department of Agriculture.
- j. "GMD1" Western Kansas Groundwater Management District No. 1.
- k. "Historical Usage" The average quantity of authorized water in acre-feet used by a point of diversion during the Comparison Years, excluding years of zero use from the seven-year average, used for the calculation of the WHCL Allocation.
- 1. "K.A.R." Kansas Administrative Regulations.
- m. "KGS" Kansas Geological Survey.
- n. "K.S.A." Kansas Statutes Annotated.
- o. "LEMA" Local Enhanced Management Area.
- p. "LEMA Period" A five year period that shall run from January 1, 2021 through December 31, 2025.

- q. "Management Plan" A written plan required pursuant to K.S.A. 82a-1041 which serves as the basis of the order establishing this LEMA to promote the conservation of water and water use efficiency.
- r. "MYFA or Multi-Year Flex Account" A type of Term Permit as defined in K.S.A. 82a-736.
- s. "Stakeholder" Any Water Right owner within the WHCL boundaries.
- t. "Term Permit" A DWR permit to appropriate water that is issued for a specified period of time and is automatically dismissed at the end of the period.
- u. "Vested Water Right" Pursuant to K.S.A. 82a -701(d), a Water Right which was put to beneficial use prior to June 28, 1945.
- v. "Voluntarily Enrolled Vested Right" A Vested Water Right which voluntarily enrolls in the WHCL Management Plan.
- w. "Water Rights"- means the same as defined in K.S.A. 82a-701(g).
- x. "WUC" Water Use Correspondent.
- y. "WCA" Water Conservation Area.
- z. "WHCL" Wichita County Local Enhanced Management Area.
- aa. "WHCL Allocation" The quantity of water in acre-feet allowed for each irrigation Appropriation Water Right and Voluntarily Enrolled Vested Right, assigned by point of diversion that may be diverted during the LEMA Period.
- bb. "WHCL Order of Designation" The Order of Designation issued by the Chief Engineer pursuant to K.S.A. 82a-1041.

#### II. Management Plan Goals

In order to meet the goal of extending the Ogallala Aquifer supplies for the long term benefit of the area included in the proposed WHCL, a public process was utilized. Specifically, the Board worked with Stakeholders during board meetings and other public meetings to develop a Management Plan based on the desires of the public.

The WHCL shall exist for a five-year period beginning on January 1, 2021 and ending on December 31, 2025. In order to address excessive water level declines and withdrawal rates exceeding recharge rates within the proposed WHCL boundaries, the goal of the Management Plan shall be to limit irrigation withdrawals to 246,882.786 acre feet during the LEMA Period.

## III. Proposal

The WHCL shall include all irrigation Appropriation Water Rights whose source is the Ogallala Aquifer within the WHCL boundaries. Pursuant to K.S.A. 82a-703 Vested Water Rights within the WHCL boundaries shall not be regulated except through voluntary enrollment. Once voluntarily enrolled in the WHCL, Vested Water Rights may not be

withdrawn for the remainder of the LEMA Period.

- a. Irrigation allocations were established for each Water Right thru an impartial process without deference to Water Right priority; however, Water Right priority is a consideration, if an impairment complaint is filed with the Chief Engineer.
- b. Non-irrigation uses will not be assigned a WHCL allocation due to their total combined water usage amounting to a minimal percentage of the total water use within the proposed WHCL boundaries. However, efficiency recommendations are provided for utilization in their management practices.
- c. The WHCL shall include the following townships:

#### Wichita County

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Township 16S, Range 35W, Sections 1 through 36
Township 16S, Range 36W, Sections 1 through 36
Township 16S, Range 37W, Sections 1 through 36
Township 16S, Range 38W, Sections 1 through 36
Township 17S, Range 35W, Sections 1 through 36
Township 17S, Range 36W, Sections 1 through 36
Township 17S, Range 37W, Sections 1 through 36
Township 17S, Range 38W, Sections 1 through 36
Township 18S, Range 35W, Sections 1 through 36
Township 18S, Range 36W, Sections 1 through 36
Township 18S, Range 37W, Sections 1 through 36
Township 18S, Range 38W, Sections 1 through 36
Township 19S, Range 35W, Sections 1 through 36
Township 19S, Range 36W, Sections 1 through 36
Township 19S, Range 37W, Sections 1 through 36
Township 19S, Range 38W, Sections 1 through 36
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This represents a LEMA boundary that is both clearly identifiable and entirely within the boundaries of GMD1, fulfilling the requirements of K.S.A. 82a-1041(a) (1), (2).

- d. All WHCL Allocation quantities shall be expressed in terms of total acre-feet for the LEMA Period and such quantity will be provided to each Water Right owner.
- e. Any unused WHCL Allocation, up to a maximum of five times the Annual Authorized Quantity, may be carried forward to a subsequent LEMA if designated by the Chief Engineer which commences in the year 2026 and the carryover quantity will not be subject to the new LEMA's conservation requirements.
- f. No point of diversion shall receive more than five times the Annual Authorized Quantity for the LEMA Period.
- g. WHCL Allocations are shown in Attachment A.
- h. WHCL Allocations for Water Rights subject to a DWR penalty order effecting permitted withdrawals from 2009 through the LEMA Period will be adjusted accordingly by DWR, and such order may not be appealed within the WHCL appeal process.

- i. Applications to change a Water Right filed with DWR will be processed under existing laws, rules, and regulations; and should be reviewed for consistency with the goals of the WHCL during the LEMA Period.
- j. Water Rights will not be permanently altered by a WHCL Order of Designation but will be subject to the terms and conditions of the WHCL Order of Designation for the duration of the LEMA Period.
- k. Water Rights currently in their perfection period shall not be restricted by the Management Plan while in their perfection period.
- 1. New Water Right applications will be considered by the Board on a case-by-case basis.

#### IV. WHCL Allocations

WHCL Allocations shall be assigned to each point of diversion and shall apply to all irrigation Appropriation Water Rights and Voluntarily Enrolled Vested Rights, subject to Section III. No Water Right shall be allowed to exceed its Annual Authorized Quantity (AAQ) unless authorized by a DWR Term Permit. WHCL Allocations for each Water Right will be included in an official Order of Designation issued by the Chief Engineer. Upon approval of the WHCL, WHCL Allocations are subject to review pursuant to Section IV (a) (5). WHCL Allocations will be established based on the following:

- a. Irrigation Water Rights
  - 1. The Historical Usage shall be reduced by the Conservation Factor. The result shall be multiplied by five (5) to establish the total WHCL Allocation for each point of diversion during the LEMA Period as follows:
    - A. If the Historical Usage is 20% or less of the AAQ for a point of diversion, the WHCL Allocation shall be:

Historical Usage x 5

- B. If the Historical Usage is more than 20% of the AAQ for a point of diversion, the WHCL Allocation shall be the greater of:
  - (i) AAQ x 20% x 5, or
  - (ii) Historical Usage x 75% x 5
- 2. If an Appropriation Water Right is authorized for the same point of diversion as a Vested Water Right that has not voluntarily enrolled in the WHCL, a WHCL Allocation shall be established for the portion, if any, of the Historical Usage authorized by the Appropriation Water Right, as follows:
  - A. If the Annual Authorized Quantity for the overlapped Vested Water Right is greater than the Historical Usage, then no WHCL

- Allocation will be established for that point of diversion and the Vested Water Right will be unaffected by the WHCL.
- B. If the Historical Usage from the point of diversion is greater than the Annual Authorized Quantity of an overlapped Vested Water Right, the WHCL Allocation will be established by subtracting the Vested Water Right's Annual Authorized Quantity from the Historic Usage, multiplying the remaining quantity, which is authorized by the overlapping Appropriation Water Right, by 75% then multiplying that product by five as described in Section IV (a) (1).
- 3. Each point of diversion within the WHCL boundaries will be assigned a WHCL Allocation pursuant to Section IV(a) (1) and are subject to review pursuant to Section IV (a) (5), (6).
- 4. If a point of diversion is authorized by more than one Water Right, it will be subject to any DWR limitations for the point of diversion.
- 5. Due consideration will be given for past conservation. If Water Rights are enrolled or have been enrolled in conservation programs, have implemented past conservation measures affecting their Historical Usage record, establishment of the WHCL Allocation will follow the guidelines set forth in Section XIII.
- 6. For Water Rights operating under the authority of a Term Permit, including a MYFA, or enrolled in a K.A.R. 5-5-11 change, WCA, or other flexible water plan, the most water restrictive plan shall apply. Water Rights within the WHCL boundaries that are withdrawn from an existing WCA during the LEMA Period shall be subject to the WHCL and provided a WHCL Allocation based on the years remaining in the LEMA Period.
- 7. Irrigation Use applications for MYFA Term Permits must be filed in the first year of the LEMA Period. If a subsequent LEMA is designated pursuant to Section III(e), then any carryover shall be limited by the provisions of this Management Plan and if no LEMA is subsequently designated then pursuant to K.S.A. 82a-736.
- b. Vested Water Rights (See Attachment B).
  - 1. Pursuant to K.S.A. 82a-703, Vested Water Rights shall not be subjected to the Management Plan.
  - 2. Vested Water Rights once voluntarily enrolled in the WHCL may access the flexibilities of the Management Plan. If voluntarily enrolled, the Vested Water Right shall be subject to the terms and conditions of the Management Plan including the assignment of a WHCL Allocation as described in Section IV (a) (1). Enrollment must occur in the first year of the LEMA Period; prior to the first irrigation application and will require all owners of the Water Right(s), to sign a notarized document provided by GMD1.

c. Non-Irrigation Uses - The water use reports of all non-irrigation Water Rights will be reviewed annually by the Board. Additionally each type of use is encouraged to implement the following recommendations:

## 1. Stock Water Rights

- A. Increase efficiency by implementing scheduled infrastructure inspections, repairing leaks in a timely manner, upgrading old equipment, and applying water reuse technology.
- B. Use less than the recommended maximum water authorized by K.A.R. 5-3-22.

### 2. Municipal Water Rights

- A. Reduce the gallons per capita per day.
- B. Implement scheduled infrastructure inspections, conduct system repairs in a timely manner, implement systems to account for all water usage.
- C. Consider implementing water reuse technology for precipitation runoff and effluent.
- D. Require all new and remodel construction projects to use water efficient plumbing fixtures and recommend that all consumers meet the new standard by updating their existing fixtures.
- E. Request all consumers, especially administrators of large capacity facilities and outdoor sport and recreation areas, maintain infrastructures and repair leaks in a timely manner.
- F. Request all consumers use less water intensive plants and lawns, water in the early morning and late evening, and be aware of the amount of water applied per year.
- 3. Industrial and Recreational Water Rights are asked to voluntarily conserve water whenever possible for the betterment of their water community.

### 4. Domestic Water Rights

- A. Reduce their gallons per capita per day.
- B. Install water efficient plumbing fixtures in new and remodel construction and update their existing fixtures.
- C. Identify and repair leaks.

D. Use less water intensive plants and lawns, and water in the early morning or late evening.

## V. Combined Well Unit (See Attachment C)

Wells within a Combined Well Unit will be allowed to share the combined quantity of their individual WHCL Allocations. No individual well shall be allowed to exceed its Annual Authorized Quantity unless authorized by a DWR Term Permit. Enrollment in a CWU must occur in the first year of the LEMA Period; prior to the first irrigation application and will require all owners of the Water Right(s), to sign a notarized document provided by GMD1. This document will contain the water right numbers and locations of the wells that are physically tied together along with a map showing the location of the pipeline. If Water right changes are required to implement a CWU, the owners are responsible for completing all necessary applications and gaining approval of such by the Chief Engineer. All Combined Well Units must be approved by the Board and the Chief Engineer prior to implementation.

#### VI. Violations

The WHCL Order of Designation shall serve as initial notice to all Water Right owners within the WHCL boundary on its effective date. A copy of the Order of Designation and the Management Plan shall be available on DWR's website and GMD1's website. DWR shall mail a notification that the Order of Designation is effective to all Water Right owners and WUC, if different from the owner, with instructions on how to request a copy of the Order of Designation. Violations shall be addressed as follows:

- a. Exceeding the five-year WHCL Allocation and all other Water Right violations shall be subject to applicable Kansas statutes and regulations, specifically but not limited to K.A.R. 5-14-10 and K.A.R. 5-14-12.
- b. The combined authorized pumping rate of all wells in a CWU shall be used to calculate the number of days pumping occurred in excess of the CWU's WHCL Allocation.

### VII. Metering and Monitoring

- a. All Water Right owners shall be responsible for ensuring their water flowmeters are in compliance with state statutes and regulations prior to the diversion of water at each point of diversion.
- b. In addition to being in compliance with DWR requirements and reporting annually the quantity of water diverted from each point of diversion, all Water Right owners within the WHCL boundaries are encouraged to implement at least one additional well or meter monitoring procedure.
- c. Should the water flowmeter reported readings be in question and determined insufficient and no other records are provided upon request of GMD1, the well shall be assumed to have pumped its full Annual Authorized Quantity for the year in question.
- d. Whenever a meter is repaired or replaced, the Water Right owner or authorized designee

shall submit form DWR 1-560 Water Flowmeter Repair/Replacement Form to GMD1 or DWR within seven days of the completed repair.

e. This metering protocol shall be a specific annual review issue and if discovered to be ineffective, specific adjustments shall be recommended to the Chief Engineer by GMD1.

### VIII. Accounting

- a. DWR, in cooperation with GMD1, shall keep records of the annual diversion amounts for each Water Right within the WHCL boundary and the total five-year quantity balances. Upon written request, this information will be available to the Water Right owner or GMD1.
- b. GMD1 and DWR shall cooperate on reconciliation and correction of any annual water use report found to be in error.
- c. GMD1 will provide DWR with copies of all completed Combined Well Unit Forms and any other documentation or information concerning the WHCL in a timely manner.

#### IX. LEMA Reviews

a. The Board and a member of DWR staff appointed by the Chief Engineer shall comprise the "Review Board" and shall conduct an annual review of the items in subsection (b). The review data shall also be presented at the Annual Meeting of GMD1.

#### b. Annual Review Items

- 1. Water use data.
- 2. Water table information.
- 3. Economic data as is available.
- 4. Compliance and enforcement issues.
- 5. Any new and preferable enhanced management authorities that become available.
- 6. Other items deemed pertinent by the Review Board.

### c. WHCL Order of Designation Reviews

In addition to the annual review of the WHCL, the Review Board shall conduct a more formal review of WHCL Order of Designation in the fourth year of the LEMA Period. The review will encompass the annual review items with a focus on the economic impacts, as data is available, to the WHCL area and the local public interest while pursuing the LEMA goals.

The Review Board shall produce a report to the Chief Engineer following this review that contains specific recommendations regarding future WHCL actions. This report shall be presented at Stakeholder meetings for the purpose of considering any future LEMA plans. All recommendations shall be supported by reports, data, testimonials, affidavits or other information of record.

#### X. Impairment Complaints

The Stakeholders request that any impairment complaint submitted to the Chief Engineer during the LEMA Period be investigated with consideration to Water Right priority and the Management Plan.

## XI. Water Level Monitoring

Prior to this WHCL proposal there were 43 recognized observation wells, two with continuous water level sensors and one continuously monitored index well, all within or near the WHCL area that have been measured annually by either DWR or KGS personnel. For each of these wells, there is a long history of annual water level measurements. Pumping influences and recovery trends can be analyzed to evaluate results of the corrective controls implemented by this Management Plan.

#### XII. Coordination

The Stakeholders expect reasonable coordination between DWR and GMD1 on at least the following efforts:

- a. Development of the WHCL Order of Designation resulting from the LEMA process.
- b. Compliance and enforcement of the WHCL Order of Designation.
- c. Annual accounting of the WHCL Allocation quantities used and available balance to Water Right owners and WUC if different from the owner.

#### XIII. Allocation Appeal Process

- a. The following process will govern appeals for the possible modification of WHCL Allocations.
  - 1. Only the amount of the WHCL Allocation may be appealed. Appeals regarding any other issues shall not be allowed and will not be considered through this process.
  - 2. The Board will serve as the appeals board. Information generated by DWR, KGS, any agency of the United States, and GMD1 will be the Board's official source of information for appeals.
- b. Water Right owners must submit a written request for an appeal to GMD1 before March 1, 2022. Failure to file an appeal before March 1, 2022 will cause the WHCL Allocation to become final during the LEMA Period. The request shall specify the point(s) of diversion, relevant year(s) of the Comparison Years, and the basis for the appeal. During the appeal period, each point of diversion is limited to one appeal for each of the three reasons listed below. Water Right owners may withdraw their

appeal by providing written notice prior to the Board issuing a final determination pursuant to subsection (e). New WHCL Allocations authorized by the Board will become effective the year the appeal is approved. Appeals may be based on any of the following reasons:

- 1. Verification of reported water use history used for the WHCL Allocations provided in Attachment A.
- 2. Due consideration of previous voluntary conservation measures resulting in an incomplete or diminished Historical Usage record.
- 3. Water Rights on land not owned, leased, rented or otherwise previously controlled or pumped for any of the Comparison Years by the Farm Services Agency producer of record as of January 1, 2020 shall be allowed a flow rate test, pursuant to subsection (f). Appeals for this reason shall be reviewed by the Board for approval.
- c. Appeals based solely on reported water use history will be referred to DWR for verification. Written notification will be provided to the Water Right owner when the process is completed.
- d. Appeals based on previous voluntary conservation measures must be accompanied by supporting documentation before the appeal will be scheduled for consideration by the Board. Information that will be required includes:
  - 1. For water rights enrolled in government sponsored conservation programs, documentation must include an approved enrollment contract indicating the years of participation.
  - 2. Any other documentation supporting past voluntary conservation that may have influenced the water use record during the Comparison Years.
- e. The Board will review the submitted information at the next scheduled board meeting or special meeting scheduled for the purpose of appeal reviews. The Board shall issue one of the following determinations:
  - 1. Denial of appeal.
  - 2. Grant an extension for the Water Right owner to provide additional information.
  - 3. New WHCL Allocation based on the information presented.
  - 4. Authorize a flow rate test. For points of diversion enrolled in government sponsored conservation programs the test may be postponed until the current contract expires.
  - 5. Authorize a WHCL Allocation equal to 20% of a point of diversion's AAQ x 5.
  - f. Flow Rate Test Procedure

- 1. All flow rate tests shall be conducted by GMD1 or DWR between June 15 and September 15.
- 2. All wells shall have adequate spacing to allow proper installation of test equipment. If spacing is insufficient the Water Right owner will have the opportunity to make the required adjustments to facilitate an accurate test.
- 3. Each well within a Combined Well Unit shall be tested independently.
- 4. The resulting flow rate will be multiplied by 150 days to determine an annual acre-foot quantity, not to exceed the Annual Authorized Quantity. The annual quantity may be used to replace the year(s) of the Comparison Years under appeal. The new Historical Use record shall be reduced by the Conservation Factor to establish the new WHCL Allocation pursuant to Section IV (a) (1).

#### XIV. Attachments

Attachments A, B, & C will be available at the GMD1 office and on the GMD1 website (www.gmd1.org).

Attachment A: Listing of WHCL Water Rights and WHCL Allocations/17 page spreadsheet

Attachment B: Voluntarily Enrolled Vested Right WHCL Consent Form

Attachment C: Combined Well Unit Form

Attachment D: GMD1 Map

Attachment E: Wichita County LEMA Boundary Map

Attachment F: KGS Estimated Useable Life Projection Map

Attachment G: KGS Observation Well Map

Attachment H: KGS Water Level Change Map

## Attachment A: Listing of WHCL Water Rights and WHCL Allocations

Proposed Allocations available on the LEMA page at <a href="www.gmdl.org">www.gmdl.org</a>
Access the allocation table linked to "View Proposed Allocations Here - 11/20/2019"

Linked Document Titled

"Wichita County Local Enhanced Management Area (LEMA): Historical Use & Allocations"

Revised 11/15/2019

# ATTACHMENT B VOLUNTARILY ENROLLED VESTED RIGHT WHCL CONSENT FORM

By signing this Voluntary Vested Right Enrollment Consent Form, I am voluntarily choosing to enroll my Vested Right into the WHCL and I understand that by enrolling my Vested Right into the WHCL that my Vested Right will be subject to all of the WHCL's conditions, restrictions and benefits.

Owner Name:						
Owner Address:				· · · ·		
City:		State:	Zip:		Phone:	
Water Right File No(s) (Use Additional Sheets if Needed)	Well ID	Section	Township	Range	Annual Authorized Quantity	LEMA Allocated Quantity
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I am voluntarily entering the Vested Water Right No(s) listed above into the WHCL. I understand that once this voluntary consent form has been approved, these Vested Rights will have to remain in the WHCL until December 31, 20 .

ALL VESTED WATER RIGHT OWNERS AND THEIR SPOUSE MUST SIGN BEFORE A NOTARY IF THEIR VESTED RIGHT AND/OR THEIR LAND IS INCLUDED IN THIS VOLUNTARY VESTED RIGHT WHCL ENROLLMENT.

MUST BE ACCOMPANIED BY THE CONSENT FORM.

### **VESTED RIGHT CONSENT FORM**

MUST BE SIGNED IN PRESENCE OF A NOTARY by <u>ALL</u> WATER RIGHT OWNERS, AND WATER USE CORRESPONDENTS (WUC).

I,	and		, understand and agree with the	terms of this
(Printed Name) Voluntary Vested Right em	(Pri	nted Spous	, understand and agree with the e Name)	
Signature Owner V (Circle one)	vuc	Date	Spouse Signature	Date
State of Kansas	) ) SS			
I hereby certify that the forday of,		signed in r	ny presence and sworn to before me this	
Notary Public My Commission Expires _				
I,(Printed Name) Voluntary Vested Right en	and (Pr		, understand and agree with the e Name)	e terms of this
Signature Owner (Circle one)	wuc	Date	Spouse Signature	Date
State of Kansas	) ) SS			
County of	•			
I hereby certify that the for day of,		s signed in	my presence and sworn to before me this _	
Notary Public My Commission Expires				

# ATTACHMENT C COMBINED WELL UNIT FORM

By signing this Combined Well Unit Form, I understand that all of the wells included in this Combined Well Unit must be physically tied together prior to the starting date of the WHCL (January 1, 20\_\_) and that in order to be approved, water right changes may be required by the Kansas Department of Agriculture, Division of Water Resources.

Owner Address:						
City:		State:	Zip:		Phone:	
Water Right File No(s) (Use Additional Sheets if Needed)	Well ID	Section	Township	Range	Annual Authorized Quantity	LEMA Allocated Quantity
			*****			
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			То	tals	<del></del>	

ALL WATER RIGHT OWNERS AND WATER USE CORRESPONDENTS APPLICABLE TO THIS COMBINED WELL UNIT MUST SIGN IN THE PRESENCE OF A NOTARY.

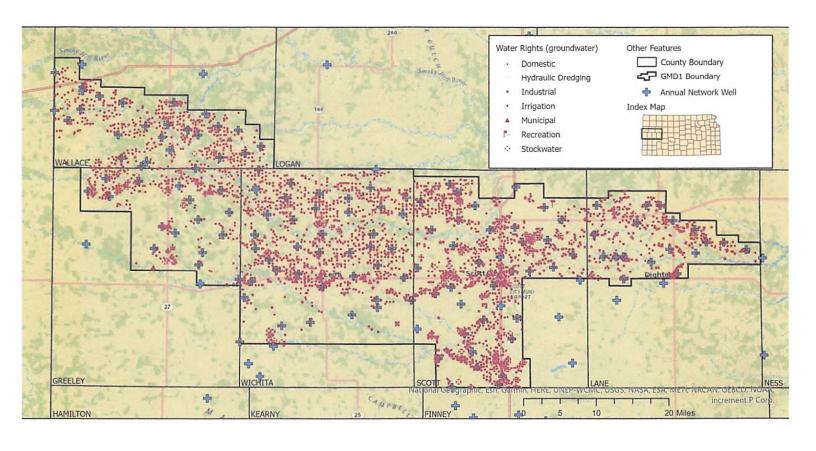
MUST BE ACCOMPANIED BY THE CONSENT FORM.

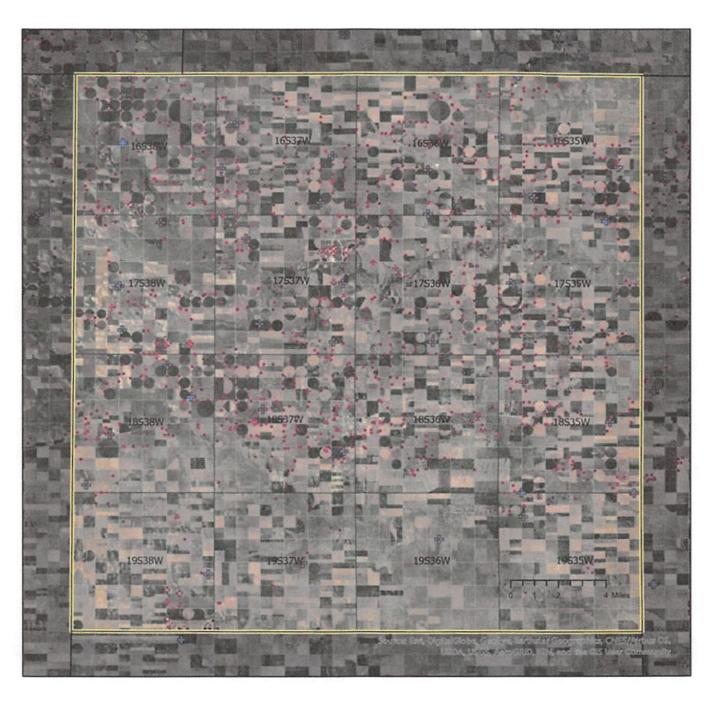
COMBINED WELL UNIT CONSENT FORM
MUST BE SIGNED IN PRESENCE OF A NOTARY by <u>ALL</u> WATER RIGHT OWNERS AND WATER USE CORRESPONDENTS (WUC).

I,	and		, understand and agree with	the terms of this
(Printed Name) Combined Well Unit.	(Pr	inted Spous	understand and agree with Name)	
Signature Owner (Circle one)	wuc	Date	Spouse Signature	Date
State of Kansas	) ) SS			
County of				
I hereby certify that the foreday of, 2		s signed in r	ny presence and sworn to before me thi	is
Notary Public My Commission Expires				
I,	and		, understand and agree with	n the terms of this
(Printed Name) Combined Well Unit.	(Pr	inted Spous	e Name)	
Signature Owner (Circle one)	wuc	Date	Spouse Signature	Date
State of Kansas	) ) SS			
County of				
I hereby certify that the for day of,		s signed in 1	my presence and sworn to before me th	is
Notary Public My Commission Expires				

# Attach Map showing the Combined Well Unit:

## Attachment D: GMD1 Map





Water Rights (groundwater)

- Domestic
   Hydraulic Dredging
- Industrial
- Irrigation
- Municipal
- \*- Recreation
- · Stockwater

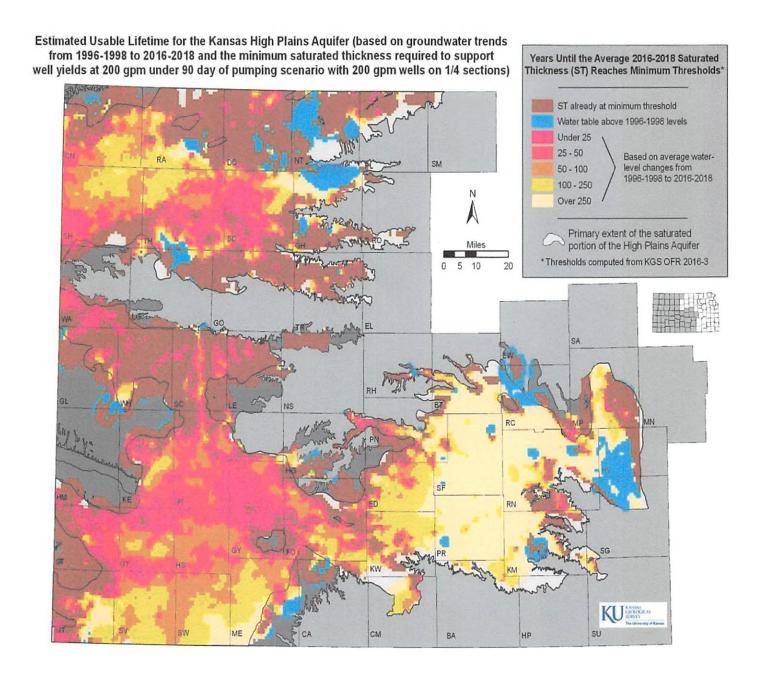
Other Features

County Boundary

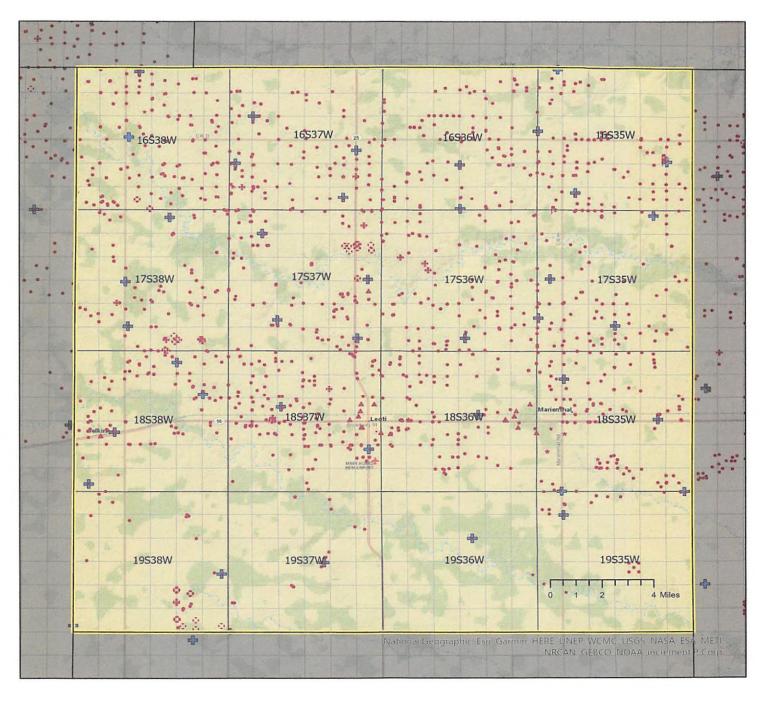
LEMA Boundary

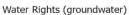
Annual Network Well

Index Map



## Attachment G: KGS Observation Well Map





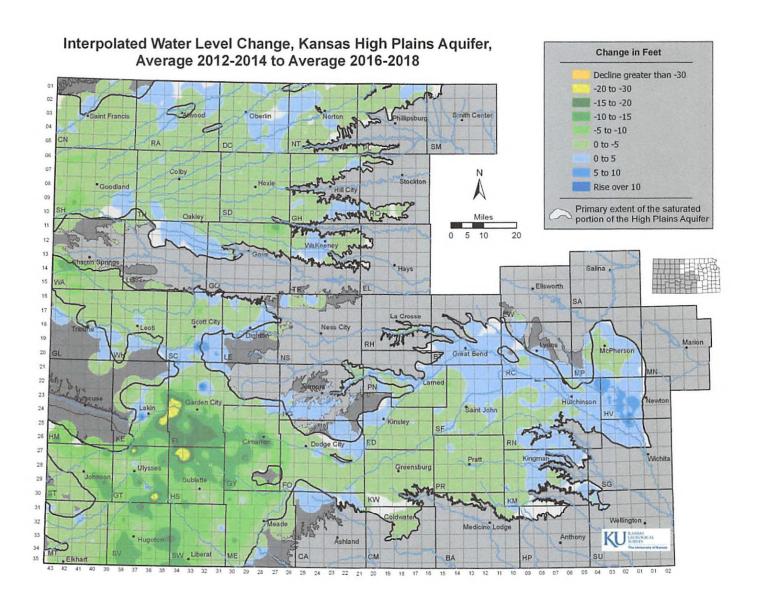
- Domestic
- Hydraulic Dredging
- \* Industrial
- Irrigation
- Municipal
- Recreation
- Stockwater

#### Other Features

- County Boundary
- LEMA Boundary
  - Annual Network Well

#### Index Map





# EXHIBIT B

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to any Vested WR's.	GTV Lembschauf/Unit [AS, of applicable]																																																				
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n	25% Comprehens (M/M)	00,700	182 99	₹.	3160	27.54	23.136	2	1	*	45.000	918.84	1/2			97.850	113.886	44.453	ş	ş		*	M/A	86/A	41137	1	W/W	55.53	65.933	ž	V/M	76.30	11.602	K/A	200'091	3676	200.00	# 553	211.945	110.544	8	120		9	**	25.32	123.056	*	72.00	165 393	4/4	2 2 2	
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H	Amenge Despto	77.493	117.708	20.04	212	27.54	71.116	22.5	1001	1	88	117.74	o the			986	151.849	59.268	84 Use	3 :	3	1	No Use	No Use	30836		4	63.570			25 25		42.136	Ro Ure	202.153	22.52	107.00	44.737	282.593	3107.044	27.70	200	1		35.00	35.370			3 2	12.33	No Use	27 727	
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LIGHA Allecators (m./ All trason Wife)	S.Tr Albecetion (AS)	62164 (1986) (19	V/M
1 f MA Alberto	25% Commentes (AS/Tr)	10.09   10.00   10.0	WA
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Ī	2315 Legal I) Use (A)	11.11   11.10   11.1	340 OFF
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13	Aborton (Institute Chara petts vector with per year)																																																						
ony Vested Wift	GTV Limits the syllest (A.S. if equilizate)																																																						
LEMA Allocations (m/o any Vested WR's)	S-Yr Albezatlen (AF)	N/A	M/A	241.79	25.EB	664.23	16.35	322.50	155.69	263.57	\$14.00	274.93	M/A	674.00	613.28	N/A	K/A	N/A	646.85	M/A	493.51	726.04	86/A	ş	1/A	1999	356.37	Ą	M/A	M/A	8118	463.30	401.11	M/A	145 10	260.30	457.65	1013	314.65	16/14	728.16	156.45	N/A	84/A	478.59	V/V	arott	842.08	M/A	473.46	32.15	453.21	72.45	M/A	M/A
A)	25% Commerce Ser (ACPN)	V/W	M/A	CE 353	02016	358.51	9779	24.500	71.17	52.714	103,750	54.945	N/A	136.800	333.656	N/A	N/A	N/A	117.372	W/W	16.703	157,704	K/A	ş	***	334,165	11.17	K/A	N/A	N/A	20,000	32,640	130.627	ΝΆ	200	903	2.53	Tio.	84,78	459	141.628	31.290	N/A	N/A	44.717	¥/34	64,000	168.416	W/A	16934	24.410	17906	3443	N/A	N/A
回口		_	П	_	П	_	_	r	<u>-</u>	_	П		П	П	П	П	П		П	_		_	r	r	_	T	r	_		Г	_	_	П	П	П	7	<del>'</del>	- Т	T	<u>-</u>	<u>-</u>	_	Г	П		_	r	_	_	_	_		П	П	_
LEASA Albecations (w/ All Vested Wift)	(A) nabezation (A)	V/N	M/A	KTM	03 574	92.199	18.55	112.50	14/19	25 53	CC 915	134.93	M/A	634.00	27 (19	M/A	V/N	Y/N	57 999	Y/N	15169	726.04	K/N	¥/¥	¥/N	1903	154.37	ş	V/N	V/H	11.15	0(199	11 109	V/N	01 521	Q Q	3	25107	Sinis	\$	20.15	156.45	WA.	W.W.	43.55	٧/١	2001	10.548	N/A	478.46	272.15	12131	72.45	W/A	W/A
Elika Albeerbon	25.K Commention (Mr/ht)	N/A	N/A	CST 293	000 649	323.55	877	24.500	21.13	52.734	101 700	54.965	M/A	336.800	122.656	N/A	V/W	N/A	137.172	¥/×)	120,36	157.706	8/A	W/4	8/A	324.165	11,273	V/W	V/M	W/W	\$79.01	32.660	138.627	V/N	000 EE	902	£1.52	112.714	61,770	ş	141.672	31.290	W/A	W/W	£12.58	V/N	00013	104.016	N/A	169.54	24.430	19906	11.49	M/A	W/A
H	8406	22,52	24084	14523	*00	22462	\$1015	22522	47123	72157	10000	37662	2304	33475	477.18	Nems	38086	34403	10504	10504	25735	****	11811	108.35 25.00	â	D.	18 18 18	1	10133	470K	25135	MSIS	74.783	26451	XM	ĝ	4 1144		100	Ş	2	ĩ	7859	25.279	95069	40415	7	36534	35	i de	5	STATO	12307	54558	13614
WA IN	10 star star	1111 991		23.00	F PT PT 675	1657 001	171	27.5	177 808.5	122 5287	173 7287 01	202 12	374 3025 174	75 2047	76 X044	9111	6436 821	eus za	1831	239 9 MS	S#6 6/1	1997 099	363	•	130	•	_	100	25 K1356	_	4114	24172	21 4W1	1149 996		ã G	476.7	_	100		982 4830		6516 534	21 22 1 72 10	533 4466.7	1340 344		1073	25.00	245	_	399 5702	50 8079	\$409 OOF	9029 10
1	LTMA floor Allecetion (AS)	Г	94.00	400	Γ		2	2	Γ	83		105 60	001	126.80		45.00	88	Mutaph PD's	\$4.00		Г	Γ	Γ	Ī	Γ	99.001	Γ	٦	r	Γ	Γ	83	Γ	П	78 2	Ī	ž Ž	Ţ	0.00	Γ	Ī	2 2	Γ		Γ	Γ	Ī	82	Γ	Γ	Ī	Γ		46 20	П
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Average Des & LEMA Floor	ides Eri ratio (ggres): Ava Use in 150 Days	r/N	Ž	3	*	ž	Ľ	ľ	=	2	*	2	×	92	747	N/A	W/W	M/A	~	*	*	Ē	ž	1	2	Ž	2	Š	ş	ž	=	*	ž	Ž	3	Ē	=	1	5	Ş	ź	٦	≨	ž	3	2	È	ž	Ş	ŝ	٦	72	2	W/A	3
Average	111	W/W	V/W	122	É	£	ž	ŕ	ś	ğ	ć	10K	V/N	462	***	W/W	M/M	W/A	1974	W/A	368	5	4/2	ş	1	4	ž	š	٧/١	*	Ĕ	£	155	M/A	4	Ě	Ē	Ě	3	4/2	ş	Ś	W/A	14/4	č	ž	٤	\$	47	Ş	ŕ	É	11.8	14/A	N/A
	lagal Average Use (A4)	et) ou		C01.10		177.141	L		L	L		SMTM	art on	1	П	ann on	44) OH	1.04 option/ws		1.04 spings		019402	L	L	L	165.553	L	3	L	L	L	L			ODD 62	(1769	<b>6</b> 21	1	15.007	L	118.817	04.14	No Use	art) on	14.71	540 GM	Ī	23454		L	L		649791	Ш	No Use
	Legal Assessed Use/PD (As)	15 02	30.05	41.14	000 76	137.141	2	85		27.72	105 643	54.915	3	154.770	163.542	3	Š	3	131 161	3	100.36	8	3	3	1	188.831	ŝ	3	Š	3	300	34,75	160814	Re Cee	29 630	ŝ	12.5	ž	â	3	38.83	27.78	2	30.0	\$7.73	3	ž	23 ≈	3	22.563	34.480	170.857	14.409	No Car	No Use
Ī	2015 Legel Une (AS)	No Use	No Use	03 63	720.0	97.70	3	2,000	97	4 1 1 2 3	04.20	40.520	No Use	020.001	114.620	#0 Çe	30.05	30.00	165.000	#5 CF#	3,500	1	3	5 2	1	1	3	3	300	500	35.02	35	176.640	3	17000	9	2	8	8	5	2	3	Š	ş	0,073	3	3	190,000	30.54	25.58	ŝ	8	0990	No Use	No Use
	2014 Legal Une (AS)	PAU ON	240) ON	000 (11	077.75	134.10	3	88				028785	and one	020 801 017 141	059 911 026 641 149 161	64C) 048	**C) GNJ	करा क्य	137.130	640 UA	017.27	196570	3	35.08	1		100	35.02	*50	250	35.02	170.550 Ne Use   Ne Use	171.NO 184 5VD	Sec Use	01.71	2700	178 (11)	2		No Che No Che	8 4 5 5	5	30.00	30 OF	95,01	35.00	017.77	23 200	30.52	170,720	27,860	020	12.440	No Use	No Use
2	2013 Legel Une (Art)	10 OF	No Use   No Use   No Use   No Use   No Use	000 54	1,010	261.840 254.740 153.000 134.330 93.790	3	3,000	X GB	57800	07.270 143.430 69.740 79.590	61.130	240 Opt	161410 261.000 216.550 171.310	191.471	No Use   No Use   No Use   No Use   No Use	30.08	64U 044	004.291   011.781   008.881   071.871   008.591	558	101870 111 150 114 540 72 230 78 840	252 030 2 36.060 217.060 196 570 383 310	3	3	1	161 S10 151 and 179 270 And Day of the United	67.170   78.790   68.340   No Use   No Use	20.00	20.00	No Use   No Use   No Use   No Use	35.02	170.650		the Live is the live is the Use is the Use	12 650 15 670 19 340 17 710 17 000 E	3	111.830	2	114 710 104 010 72 800 68 600 104 00	No Use No Use to Use	GET 141   GET 141   GRE 602   GRO 612   GRE 812	3	No Use No Use No Use No Use No Use	35.82	97.25	3	90.140 72.710 65.920 A2.420 No.Use	18830	3	140,740 130,290 140,670 120,720 92.570	8	97,000	2.290 25.840 13.420	No Use   No Use   No Use   No Use   No Use	No Che
Haterical Us	2012 Legal (Ac (Ar)	No Che	No Use	00074	175.50	354.740	8	11 000 11 000 11	26	59.000 64.000	343 630	13.440	No Use	261.140	230.540	No Use	100	No Cho	27.130	200	31 1H 350	286.00	3	3	1		2	3	3	100	300	125.720 96.560	0,134.970	No Che	15.070	22	140.52	2	1040	3	719 000	3	100	3 2	20.98	3	2,76	200.00	3	200	976	176.00	25.840	No Clea	No Che
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