

21. Mandy Stone, USGS
22. Richard Robinson
23. David Randolph
24. George Austin
25. Any Experts Listed by Any of the Parties in this Matter
26. Any Witnesses Listed by Any Other Party
27. Any Witnesses Necessary for Rebuttal or Foundation Purposes
28. Any Current or Former City of Wichita or DWR Employees that Have Worked on the ASR Permit Modification Proposal
29. Any Current or Former City of Wichita or DWR Employees that Have Worked on the ASR Project

Exhibits:

1. The ASR Permit Modification Proposal and All Attachments and Documents Referenced in the Proposal
2. Phase I Memorandum of Understanding and Related Documents
3. Phase II Memorandum of Understanding and Related Documents
4. All Documents Produced by Any Party in Response to Written Discovery
5. Any Written Answers of the Parties to Discovery Sent by Any Party
6. All Expert Reports of the District
7. All Documents Referenced in the Expert Reports of the District
8. All Expert Reports Furnished by Any Party
9. The USGS Equus Beds Groundwater Flow Model
10. The Kansas Water Appropriation Act and rules and regulations
11. All Permits at Issue Involving the City
12. Permits and Water Rights of Other Users in Area of City's Well Field
13. Germane Safe Yield Calculations Performed by the District
14. Well Measurements in the Area of the City's Well Field
15. Data or Measurements Involving the Burton Chloride Plume
16. Streamflow Records for the Little Arkansas River
17. Rainfall Records for the Equus Beds
18. Any Reports Involving Operation of the City's ASR Facility
19. Any Documents Germane to Subsequent Phases of the ASR Project (post Phase I and Phase II)
20. Any USGS Documents or Data Related to the ASR Project Including, but not limited to, Reports and Data on Water Quality and Levels
21. Any KGS Documents or Data Related to the ASR Project Including, but not limited to, Reports and Data on Water Quality and Levels
22. Any Sustainability Assessment Related to the District or the ASR Basin Storage Area Performed by KGS and Related Data
23. Well Data Germane to City's Wells
24. Any KGS Groundwater Model Related to the Basin Storage Area or the ASR Project
25. Well Data Germane to Other Users in Area of City's Well Field
26. Equus Beds Groundwater Management District No. 2 Management Program, Effective May 1, 1995
27. Maps of the District and ASR Project Area

28. District Computer Mapping Software including ArcGis safe yield evaluation application
29. City of Wichita water right files HV006, 388, and 1006, and any other City water rights not listed
30. City of Wichita ASR Water Permits (list can be furnished if needed)
31. All City of Wichita Annual ASR Accounting Reports
32. All Discovery from and to the City, DWR, and the District
33. All documents from the ASR Phase I and Phase II Hearings
34. All available water level and water quality information in the District's or others' possession
35. The District's Rules and Regulations
36. All Exhibits Found at www.agriculture.ks.gov/WichitaASR
37. Class V injection(s) permits issued by KDHE for the ASR project
38. Deposition Transcript and Exhibits for Lane Letourneau
39. Any and All Documents Related to the ASR Permit Modification Proposal
40. All Documents Listed by the Other Parties
41. Any and All Documents Related to the ASR Project

RESPECTFULLY SUBMITTED,

/s/ David Stucky

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Attorneys for Equus Beds Groundwater
Management District Number 2

CERTIFICATE OF FILING AND SERVICE

We, Thomas A. Adrian and David J. Stucky, do hereby certify that a true and correct copy of the above was served by () mail, postage prepaid and properly addressed by depositing the same in the U.S. mail; () fax; () email; and/or () hand delivery on the 11th day of March, 2019, to:

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and the original sent by () mail, () fax, () email, and/or () electronically filed to/with:

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/s/ David Stucky

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