



# SOUTHERN NEVADA WATER AUTHORITY

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STATE ENGINEERS OFFICE

June 11, 2009

Jason King, P.E.  
Acting State Engineer  
State of Nevada  
Department of Conservation & Natural Resources  
Division of Water Resources  
901 South Stewart Street, Suite 2002  
Carson City, NV 89701

Dear Mr. King:

**SUBJECT: APPLICATION NOS. 54022 THROUGH 54030: RESPONSE TO INTERIM ORDER NO. 3 NOTICE OF POSTPONEMENT OF HEARING AND SCHEDULING**

In accordance with the subject Interim Order, the Southern Nevada Water Authority (Authority) is providing the requested information regarding delays in completion of the groundwater model being developed in preparation for the hearing on the Authority's Snake Valley applications.

As you are aware, the Authority has been working with the Bureau of Land Management (BLM) on preparation of a groundwater model in support of the federal environmental review process. The BLM is preparing an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act, in response to the Authority's request for rights-of-way across federal lands, and is planning to utilize a groundwater model as part of the EIS analysis. As per our earlier correspondence, it is preferred to have the same model utilized in the water rights hearing as is utilized in the EIS analysis. The discussion below describes the progress on completion of the model and some of the issues that have resulted in a schedule delay.

In late 2004, the Authority began assembling existing and new data for development of a groundwater model and the associated coordination with the BLM and EIS cooperating agencies. In the Fall of 2006, the modeling platform was changed from FEMFLOW3D to MODFLOW, in response to agency requests to utilize the more familiar MODFLOW platform. In November 2006, the BLM established a hydrology technical review team to assist in its review of the model. Members of the team included representatives from the BLM project team, the BLM Nevada office, the BLM Denver regional office, the BLM Utah office, the EIS contractor, the EIS subcontractor specialist, the U.S. Geological Survey (USGS), the Utah Geological Survey, and an observer from the Nevada Division of Water Resources. The technical team, the Authority, and the Authority's modeling contractor held general bi-weekly to monthly meetings and conference calls over the next 2½ years. During this time, the technical team provided input on the development of model components, including: recharge and discharge methodologies, aquifer properties, model construction, water budget, boundary conditions, hydrogeologic framework, model domain, evapotranspiration, hydrographs and water use estimates, groundwater flow routing, spring observation data, and model calibration.

#### SNWA MEMBER AGENCIES

Big Bend Water District • Boulder City • Clark County Water Reclamation District • City of Henderson • City of Las Vegas • City of North Las Vegas • Las Vegas Valley Water District

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Several draft reports have been developed by the Authority during model development. The BLM technical team reviewed a series of draft baseline reports in late 2006 to mid 2007, a May 2007 draft baseline characterization report, an April 2008 draft conceptual and numerical model report, a February 2009 transient calibration approach methodology, and a February 2009 revised draft conceptual and numerical model reports. The May 2007 draft baseline characterization report and April 2008 draft conceptual and numerical model report were also reviewed by the 15 EIS cooperating agencies.

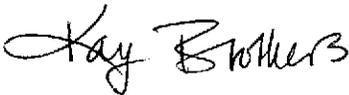
The Authority has expended significant effort and is making diligent progress on completion of the groundwater model. However, the large number of agency reviewers and extended review periods has added substantial time to the process. Coordinating schedules for meetings to accommodate document reviews with the 8 to 10+ member BLM hydrology technical team and periodic additional other agency specialists, has delayed progress. Because of the sheer number of reviewers and conflicts with their other workloads, review periods for draft reports and technical memos by the technical team have ranged from 1 to 2.5 months, more than doubling the time expended for usual and customary review periods of this nature. There has also been substantial time spent resolving multiple and often conflicting comments from the different reviewers.

In addition to delays caused by scheduling conflicts and extended review periods, the progress of model components have been delayed in order to address agency requests to incorporate additional data and methodology not available at the time, including: 8 months to obtain the USGS Basin and Range Carbonate Aquifer Study data, 5 months attempting to use the USGS Basin Characterization Model to develop a recharge estimation approach, 4 months testing a separate water balance methodology by USGS, and ongoing delays in obtaining mining water use and consumptive use records.

Following the issuance of Interim Order No. 3, the Authority and the BLM met to discuss the timing for completing the groundwater model. At this time, the Authority and the BLM have agreed to a schedule for completion and approval of the groundwater model in late 2009. While the duration of this modeling effort has exceeded original estimates, the Authority believes that the BLM's process will produce a model that is suitable for use in the EIS process, complies with the applicable requirements of the National Environmental Policy Act, and that will be useful both in future hearings before your office and as a monitoring and management tool as groundwater development in eastern Nevada moves forward.

We will continue to keep your office informed on the progress. If you have any questions or would like additional information, please contact me directly at (702) 862-3708.

Sincerely,



Kay Brothers  
Deputy General Manager  
Engineering and Operations

KB:KAA:LL:df

cc: Service List

## CERTIFICATE OF SERVICE

I hereby certify that, on the 11<sup>th</sup> day of June, 2009, I deposited for mailing in the U.S Mail a true and correct copy of the **APPLICATION NOS. 54022 THROUGH 54030: RESPONSE TO INTERIM ORDER NO. 3 NOTICE OF POSTPONEMENT OF HEARING AND SCHEDULING** letter, postage prepaid and addressed as follows:

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