

STATE OF KANSAS  
BEFORE THE DIVISION OF WATER RESOURCES  
KANSAS DEPARTMENT OF AGRICULTURE

In the Matter of the City of Wichita's )  
Phase II Aquifer Storage and recovery Project )  
In Harvey and Sedgwick Counties, Kansas )

Case No. 18 WATER 14014

\_\_\_\_\_  
Pursuant to K.S.A. 82a-1901 and K.A.R. 5-14-3a

**CITY OF WICHITA'S RESPONSES TO EOUUS BEDS GROUNDWATER  
MANAGEMENT DISTRICT NUMBER 2 FIRST INTERROGATORIES  
TO CITY OF WICHITA, KANSAS**

1. Identify each person who provided information or otherwise prepared or assisted in the preparation of the responses to these Interrogatories and to the Requests for Production of Documents and the Requests for Admissions served simultaneously with these Interrogatories and specify for each such person the information provided.

RESPONSE:

Counsel objects to the Interrogatory as overly broad and unduly burdensome, particularly the portion that seeks particularized attribution of each piece of information in all responses.

/s/ Brian K. McLeod  
Brian K. McLeod, SC # 14026

Subject to and without waiving the foregoing objection, the City responds as follows:

Persons who prepared or assisted in the preparations of the responses include:

Brian McLeod, document preparation; Alan King, document review; Joe Pajor, document review; Don Henry, document review; Scott Macey, document preparation; Brian Meier, document preparation; Don Koci, document review; John Winchester, technical support and document review; Daniel Clement, technical support and document review; Paul McCormick, technical support and document review; Luca DeAngelis, document review; and Nathan Dunahee, document review.

2. Identify all documents that are relevant to the Subject Matter of this administrative hearing or the AMC Proposal.

RESPONSE:

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Counsel objects to the Interrogatory as overbroad, unduly burdensome, and invading work product to the extent it necessarily seeks to appropriate the mental impressions of the City's counsel as to what is "relevant."

/s/ Brian K. McLeod

Brian K. McLeod, SC # 14026

Subject to and without waiving the foregoing objection, the City further responds as follows:

Relevant documents include but are not necessarily limited to:

- 1993 Water Supply Study (Integrated Local Water Supply Plan)
- 2000 Concept Design Study of the Equus Beds ASR Project and Appendices
- 2000 Demonstration Project Report
- 2005 Operations Modeling
- 2008 Equus Beds Storage Deficit Relationships
- 2009 Environmental Impact Statement and Appendices
- 2009 Geochemical Study for the ASR Program
- 2010 Equus Beds ASR Record of Decision
- 2010 Water Chemistry Pilot Test Report
- 2010 ASR Program Review by HDR
- 2011 Diversion Well Testing Report and Appendices
- 2013 Water Demand Assessment
- 2013 Drought Response Plan
- 2017 ASR Permit Change Meeting Handout
- ASR Accounting Reports (2006 -2016)
- ASR Phase 1 BSW Evaluation Reports
- Documents and references produced by High Country Hydrology (HCH Documents)
- USGS Reports as listed in USGS Documents Exhibits.docx
- KGS Reports as provided in subdirectory KGS Documents
- USGS Data available at: <https://www.usgs.gov/centers/kswsc/science/equus-beds-recharge-project>
- Documents available 10/30/2018 at Wichita's ASR Website: <http://wichitaasr.org>
- Documents available 10/30/2018 at State of Kansas website: <http://www.agriculture.ks.gov/WichitaASR>
- Documents available at other websites listed in the City's Production of Documents.
- Proposal for Modifications to ASR permit conditions, and documents referenced therein
- Additional documents produced by City in discovery

Each of the aforementioned documents and additional relevant documents are provided as components of the electronic file folders supplied with the Production of Documents, in the directory POD. A full list of documents provided is available as the file POD\_Documents.doc. Wherever any of the documents provided or referred to provide

reference to other source documents, each such reference shall be considered as presented herewith.

Additional relevant documents not available to the City may include:

- Documents prepared by Groundwater Management District No. 2, but not provided.
  - District staff analyses of the Permit Modification proposal
  - Consulting contracts between the District and consultants retained by the District for this matter
  - Audio records of the District's public meetings and proceedings, District board member communications and District staff's communications and analyses related to the City proposal at issue in this matter
  - As-yet unidentified documents to be identified by the District as relied upon to support its contentions in this matter.
  - The District's and DWR's Interrogatory Responses
  - Documents produced by other parties in discovery
3. If any of your responses to the District's Requests for Admission are anything other than an unqualified admission, provide a detailed explanation of any and all facts that relate to or concern your responses and identify:
- a. Any and all persons with facts that relate to or concern your responses; \_\_\_\_\_
  - b. Any and all documents that relate to or concern your responses.

RESPONSE:

Counsel objects to the Interrogatory as overly broad, unduly burdensome, and designed to invade protected work product.

/s/ Brian K. McLeod  
Brian K. McLeod, SC # 14026

Subject to and without waiving the foregoing objections, the City further responds as follows:

Explanations for the City's Responses to the Requests for Admissions are provided with the responses. Responses to Requests 1 through 13, 17, 18 and 26 should have been ascertainable from the City's proposal. Requests 14, 15 and 16 were answerable from the proposal and referenced statutes and regulations. Information relating to the response to request 19 was contributed by City staff and consultants having knowledge of USGS peer review of the model and of DWR and District staff review of the inputs and outputs used. Information for the response to request 21 was contributed by Alan King. Responses to Requests 22-24 are based upon the referenced regulation.

Documents that may "relate to or concern" the City's responses include the City's proposal and referenced statutes and regulations, and may also include (but are not necessarily

limited to) those provided by the City in its responses to the District production request.

Persons with knowledge of facts that relate to the responses include:

Brian McLeod; Alan King; Joe Pajor; Don Henry; Scott Macey; Brian Meier; Don Koci; John Winchester; Daniel Clement; Paul McCormick; Luca DeAngelis; Nathan Dunahee; and Tracy Streeter.

Each of the documents (other than statutes and regulations) that relate to the responses are provided as components of the electronic file folders supplied with the Production of Documents, in the directory POD. A full list of documents provided is available as the file POD Documents.doc. Wherever any of the documents provided or referred to provide reference to other source documents, each such reference shall be considered as presented herewith.

4. If you have ever had any of the documents that are to be identified pursuant to any of these Interrogatories or are to be produced pursuant to any of the Requests for Production of Documents served simultaneously with these Interrogatories but do not now have such document(s) in your possession, custody, or control, state the following with respect to each such document:
  - a. The present location thereof or all reasons why you cannot or do not know the location thereof.
  - b. The date each such document left your possession, custody, or control.
  - c. The reasons each such document is not now in your possession, custody, or control.
  - d. Identify all persons having knowledge about the matters inquired about in the immediately preceding paragraphs (a) through (c).

RESPONSE:

Counsel objects to the Interrogatory as overly broad and unduly burdensome.

/s/ Brian K. McLeod  
Brian K. McLeod, SC # 14026

Subject to, and without waiving the foregoing objection, the City further responds as follows:

The City believes it has access to most documents that pertain to its proposal and this proceeding, and it has not disposed of any such. The City does not have access to the consultant contracts unlawfully concealed by the District, or any other pertinent records the District has similarly withheld or concealed. Some of the documents accessed by the City are (as apparent from the document descriptions) not City-originated or maintained, but were (and can be) accessed on the websites of the entities that originated and maintain the documents.

High Country Hydrology has identified the book Water in Environmental Planning by Thomas

Dunne and Luna Leopold as a reference. This text will not be provided as part of the Production of Documents, but it is available for purchase.

5. If any of the documents that are to be identified pursuant to any of these Interrogatories or are to be produced pursuant to any of the Requests for Production of Documents served on you simultaneously with these Interrogatories are withheld under a claim of privilege, or are not produced for whatever reason:
  - a. State with specificity the claim of privilege or other reason to withhold production.
  - b. Identify each such document by date, author, and subject matter, without disclosing its contents, in a manner sufficient to allow it to be described to the Hearing Officer for ruling on the privilege or other reason asserted.
  - c. Produce those portions of any such document that are not subject to a claim of privilege or other reason for non-production by excising or otherwise protecting the portions for which a privilege is asserted, if such a technique does to result in disclosing the contents of the portions for which some privilege is asserted.

RESPONSE:

A descriptive log of documents identified as potentially responsive but withheld under claim of privilege or work product doctrine is attached as Exhibit A hereto.

6. Identify any person that has or may have knowledge, other than the general public, of the facts related to the Subject Matter of this administrative hearing or the AMC Proposal.

RESPONSE:

Counsel objects to the Interrogatory as over broad and unduly burdensome, and as necessarily seeking to invade work product by seeking to appropriate the mental impressions of the City's counsel as to what is "relevant".

/s/ Brian K. McLeod

Brian K. McLeod, SC # 14026

Subject to and without waiving the foregoing objection, the City further responds as follows:

Individuals with knowledge include, but are not necessarily limited to, the members of the following groups, and any meeting attendees present during Wichita's presentations:

The Chief Engineer and staff of the Division of Water Resources, Kansas Department of Agriculture; Kansas Farm Bureau; Equus-Walnut Regional Advisory Committee; Regional Economic Area Partnership; Kansas Municipal Utilities; League of Kansas Municipalities; Kansas Rural Water Association; Kansas Livestock Association; Sedgwick County Farm Bureau; Harvey

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County Farm Bureau; Sedgwick Count Commission; Board members and Staff of Groundwater Management District # 2; and Harvey County Commission.

Additional persons with knowledge of the facts related to the subject matter may include:

Brian McLeod; Alan King; Joe Pajor; Don Henry; Scott Macey; Brian Meier; Don Koci; John Winchester; Daniel Clement; Paul McCormick; Luca DeAngelis; Nathan Dunahee; Tracy Streeter; Earl Lewis; Mary Knapp; Tessa Wendling; Richard Basore; Josh Carmichael; Judy Carmichael; Bill Carp; Carol Denno; Steve Jacob; Terry Jacob; Michael J. McGinn; Michael P. and Susannah M. McGinn; Bradley Ott; Tracy Pribbenow; Robert Seiler and David Wendling.

7. Please identify all experts you have hired or consulted with regarding the Subject Matter of this administrative hearing or the AMC Proposal, and:
  - a. Identify all documents that have been provided to all such experts;
  - b. Identify all documents that have been provided to you by such experts;
  - c. State the subject matter in which each expert was consulted and the substance of their expected testimony at hearing.

RESPONSE:

Counsel objects to the Interrogatory as overly broad, unduly burdensome, and designed to invade work product.

/s/ Brian K. McLeod  
Brian K. McLeod, SC # 14026

Subject to and without waiving the foregoing objection, the City further responds as follows:

Preliminary Expert Disclosures were provided consistent with the schedule set in the Prehearing Order. The City offers the following additional information relating to listed experts, some of whom may also testify as fact witnesses (To the extent documents in the production response are referred to, this data is additionally responsive to the District's Production Requests 8 and 9):

**Alan King; Director, City of Wichita Public Works & Utilities**

- a) Alan King's factual observations and opinions are presented in the ASR Permit Modification Proposal and cover letter. Specific contributions are as indicated in the table Summary of Expert Witness Contributions.
- b) Consulted for: Municipal Utility Management, and also City Council directions and policy development with regard to water utility infrastructure, water conservation, and drought response
- c) The grounds for Alan King's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, and Meetings.
- d) Documents
  - i. Documents prepared by or under the supervision of Alan King are provided in the subdirectories Proposal and Proposal Communications.
  - ii. Alan King was provided, relied upon, or reviewed documents included in the subdirectories Proposal, Proposal Communications and Reports.
- e) Additional documents provided by Alan King include correspondence found in the subdirectory Electronic Communications.
- f) Alan King is a City of Wichita employee; his compensation is publicly available.
- g) Alan King's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Joseph Pajor, Deputy Director, City of Wichita Public Works and Utilities**

- a) Joseph Pajor's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal. Specific contributions are as indicated in the table Summary of Expert Witness Contributions
- b) Consulted for: Wichita's historical interactions with Groundwater Management District No. 2, the history of the City's water resources and the purposes of the changes contemplated by the City's current ASR proposal
- c) The grounds for Joseph Pajor's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, Meetings, and Reports.
- d) Documents
  - i. Documents prepared by or under the supervision of Joseph Pajor are provided in the subdirectories Proposal and Proposal Communications.
  - ii. Joseph Pajor was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications and Reports.
- e) Additional documents provided by Joseph Pajor include correspondence found in the subdirectory Electronic Communications.
- f) Joseph Pajor is a City of Wichita employee; his compensation is publicly available.

- g) Joseph Pajor's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Don Henry, Assistant Director, City of Wichita Public Works and Utilities,**

- a) Don Henry's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal. Specific contributions are as indicated in the table Summary of Expert Witness Contributions
- b) Consulted for: Municipal Water Utility Management and planning, including the history of the City's water resources, history and trends in the aquifer, 1993 water levels and the purposes of the changes contemplated by the City's current ASR proposal
- c) The grounds for Don Henry's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, Meetings, and Reports.
- d) Documents
  - i. Documents prepared by or under the supervision of Don Henry are provided in the subdirectories Proposal and Proposal Communications.
  - ii. Don Henry was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications and Reports.
- e) Additional documents provided by Don Henry include correspondence found in the subdirectory Electronic Communications.
- f) Don Henry is a City of Wichita employee; his compensation is publicly available.
- g) Don Henry's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Scott Macey, Water Resources Engineer, City of Wichita Public Works & Utilities**

- a) Scott Macey's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal. Specific contributions are as indicated in the table Summary of Expert Witness Contributions
- b) Consulted for: current and historical water use trends, current City treatment processes and infrastructure planning, and technical tools and models used for water resource decision making
- c) The grounds for Scott Macey's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, Meetings, Reports, and Water Rights.
- d) Documents
  - i. Documents prepared by or under the supervision of Scott Macey are provided in the subdirectories Proposal and Proposal Communications.



- ii. Scott Macey was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications, Reports, and Model.
- e) Additional documents provided by Scott Macey include correspondence found in the subdirectory Electronic Communications.
- f) Scott Macey is a City of Wichita employee; his compensation is publicly available.
- g) Scott Macey's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Brian Meier, Burns & McDonnell**

- a) Brian Meier's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal. Specific contributions are as indicated in the table Summary of Expert Witness Contributions
- b) Consulted for: Wichita's ASR project history, including its missions, goals, and methods, and the interagency coordination as the City's water utility employed a dynamic plan for its water resources
- c) The grounds for Brian Meier's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, Meetings, Reports, and Water Rights.
- d) Documents
  - i. Documents prepared by or under the supervision of Brian Meier are provided in the subdirectories Proposal and Proposal Communications.
  - ii. Brian Meier was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications, Reports, and Model.
- e) Additional documents provided by Brian Meier include correspondence found in the subdirectory Electronic Communications.
- f) Brian Meier is a Burns & McDonnell employee; the Contracts provided in the City's Production of Documents disclose a Fee Schedule for each class of employee.
- g) Brian Meier's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Don Koci, Burns & McDonnell**

- a) Don Koci's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal. Specific contributions are as indicated in the table Summary of Expert Witness Contributions
- b) Consulted for: Wichita's ASR project history, goals and mission, in addition to water rights and regulatory structures
- c) The grounds for Don Koci's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, Meetings, Reports, and Water Rights.

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- d) Documents
  - i. Documents prepared by or under the supervision of Don Koci are provided in the subdirectories Proposal and Proposal Communications.
  - ii. Don Koci was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications, Reports, and Model.
- e) Additional documents provided by Don Koci include correspondence found in the subdirectory Electronic Communications.
- f) Don Koci is a Burns & McDonnell employee; the Contracts provided in the City's Production of Documents disclose a Fee Schedule for each class of employee.
- g) Don Koci's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**John Winchester, High Country Hydrology**

- a) John Winchester's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal. Specific contributions are as indicated in the table Summary of Expert Witness Contributions
- b) Consulted for: municipal water resources planning, hydrological analyses, drought simulation, use of the 1% drought in the planning process, and technical tools and models
- c) The grounds for John Winchester's opinions are knowledge of pertinent information presented in the subdirectory HCH.
- d) Documents
  - i. Documents prepared by or under the supervision of John Winchester are provided in the subdirectory HCH.
  - ii. John Winchester was provided, relied upon, or reviewed documents included in the subdirectory HCH.
- e) Additional documents provided by John Winchester include correspondence found in the subdirectory Electronic Communications.
- f) John Winchester is a High Country Hydrology employee; the subdirectory Contracts provided in the City's Production of Documents discloses contractual agreements with R.W. Beck, Inc., and SAIC Energy, Environment & Infrastructure, LLC. Each company was directly engaged by the City of Wichita; these Contracts are also provided.
- g) John Winchester's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Daniel Clement, Burns & McDonnell**

- a) Daniel Clement's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal.

- b) Consulted for: Equus Beds aquifer water usage and sustainable yield, recharge mechanisms and accounting, water resource conditions, and technical tools and models
- c) The grounds for Daniel Clement's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, Meetings, Reports, Model, and Water Rights.
- d) Documents
  - i. Documents prepared by or under the supervision of Daniel Clement are provided in the subdirectories Proposal, Proposal Communications, and Model.
  - ii. Daniel Clement was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications and Reports.
- e) Additional documents provided by Daniel Clement include correspondence found in the subdirectories Proposal Communication and Electronic Communications.
- f) Daniel Clement is a Burns & McDonnell employee; the Contracts provided in the City's Production of Documents disclose a Fee Schedule for each class of employee.
- g) Daniel Clement's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Paul McCormick, Burns & McDonnell**

- a) Paul McCormick's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal.
- b) Consulted for: aquifer water usage and sustainable yield, recharge mechanisms and accounting, water resource conditions, and technical tools and models
- c) The grounds for Paul McCormick's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Proposal Communication, Meetings, Reports, and Model.
- d) Documents
  - i. Documents prepared by or under the supervision of Paul McCormick are provided in the subdirectories Proposal, Proposal Communications, and Model.
  - ii. Paul McCormick was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications and Reports.
- e) Additional documents provided by Paul McCormick include correspondence found in the subdirectories Proposal Communication and Electronic Communications.
- f) Paul McCormick is a Burns & McDonnell employee; the Contracts provided in the City's Production of Documents disclose a Fee Schedule for each class of employee.
- g) Paul McCormick's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Luca DeAngelis, Burns & McDonnell**

- a) Luca DeAngelis's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal.
- b) Consulted for: historical and current aquifer conditions, such as chloride transport, and modeling simulation tools
- c) The grounds for Luca DeAngelis' opinions are knowledge of pertinent information presented in the subdirectories Proposal, Reports, and Model.
- d) Documents
  - iii. Documents prepared by or under the supervision of Luca DeAngelis are provided in the subdirectory Proposal.
  - iv. Luca DeAngelis was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications and Reports.
- e) Additional documents provided by Luca DeAngelis include correspondence found in the subdirectory Electronic Communications.
- f) Luca DeAngelis is a Burns & McDonnell employee; the Contracts provided in the City's Production of Documents disclose a Fee Schedule for each class of employee.
- g) Luca DeAngelis's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

**Nathan Dunahee, Burns & McDonnell**

- a) Nathan Dunahee's factual observations and opinions are presented in the ASR Permit Modification Proposal, cover letter, and supporting appendices presented in the subdirectory Proposal.
- b) Consulted for: geochemical effects of natural and artificial aquifer groundwater recharge, and modeling simulation tools
- c) The grounds for Nathan Dunahee's opinions are knowledge of pertinent information presented in the subdirectories Proposal, Reports, and Model.
- d) Documents
  - i. Documents prepared by or under the supervision of Nathan Dunahee are provided in the subdirectory Proposal.
  - ii. Nathan Dunahee was provided, relied upon, or reviewed documents included in the subdirectories Proposal Communications and Reports.
- e) Additional documents provided by Nathan Dunahee include correspondence found in the subdirectory Electronic Communications.
- f) Nathan Dunahee is a Burns & McDonnell employee; the Contracts provided in the City's Production of Documents disclose a Fee Schedule for each class of employee.
- g) Nathan Dunahee's qualifications are as presented in the City of Wichita's Preliminary Expert Disclosure.

8. If you have ever had any of the documents that are to be identified pursuant to any of these Interrogatories or are to be produced pursuant to any of the Requests for Production of Documents served on you simultaneously with these Interrogatories that have been destroyed, describe in detail the circumstances of and all reasons for such destruction and produce all documents that relate to or concern either the circumstances or the reason for such destruction.

RESPONSE:

Counsel objects to the Interrogatory as vague, particularly in the context of the overbroad and burdensome nature of the District's requests.

/s/ Brian K. McLeod  
Brian K. McLeod, SC 14026

Subject to and without waiving the foregoing objection, the City responds as follows:

The City does not believe any such documents in its possession have been destroyed, but cannot speak to consultant contracts or other public records in the possession of the District, or the circumstances or reasons for the District's destruction of any such documents the District may have destroyed.

9. Please indicate any and every meeting and communication You have had with the DWR about the Subject Matter. Please include the date of each meeting and/or communication, the individuals involved in any meeting and/or communication, the subject matter of each communication and/or meeting, and the location of any communication and/or meeting.

RESPONSE:

Counsel objects to the Interrogatory as overly broad and unduly burdensome.

/s/ Brian K. McLeod  
Brian K. McLeod, SC # 14026

Subject to and without waiving the foregoing objection, the City further responds as follows:

The City has employed computer term searches to locate electronic calendars and email communications from which it believes the answer to the Interrogatory may be compiled, and has produced these to the District concurrently herewith. The City refers the District to

this body of documents as its answer to this Interrogatory.

Applicable communications or correspondence is provided in electronic form, as the subdirectory Proposal Communications. Additional detail may be available in the subdirectory Electronic Communications. Applicable meetings in which additional pertinent communications may have occurred are listed in the subdirectories DWR Meetings and GMD2 Meetings.

10. Please explain in detail the accounting method that will be used to determine water entering and leaving the Aquifer with the AMC Proposal.

RESPONSE:

Please refer to the proposal documents and Proposal Correspondence.

11. Please explain in detail how the Aquifer will be artificially recharged through the AMC Proposal.

RESPONSE:

Please refer to the proposal documents and Proposal Correspondence.

12. Please explain in detail where source water will be treated and used pursuant to the AMC Proposal.

RESPONSE:

Please refer to the proposal documents and Proposal Correspondence.

13. Please explain in detail how source water will be treated pursuant to the AMC Proposal.

RESPONSE:

Please refer to the proposal documents and Proposal Correspondence.

14. Please explain the calculation used to arrive at the AMC five percent initial loss and the rationale for that calculation.

RESPONSE:

Please refer to the proposal documents and Proposal Correspondence.

15. Please explain in detail how the proposed AMC gradational annual losses were determined.

RESPONSE:

Please refer to the proposal document and Proposal Correspondence.

16. Please explain in detail how the physical recharge capacity of the Aquifer was determined.

RESPONSE:

Please refer to the proposal documents, Proposal Correspondence, and the subdirectory Reports within the City's Production of Documents.

17. Please explain in detail whether the water quality of the Aquifer will be impacted by the AMC Proposal and Your rationale.

RESPONSE:

Please refer to the Proposal Document and the subdirectory Reports for information regarding protection of water quality.

18. Please explain what infrastructure will be utilized for the AMC Proposal.

RESPONSE:

All currently constructed and future ASR infrastructure will be utilized in conjunction with the AMC proposal. Please refer to the Proposal Document and the subdirectory Reports.

19. Please explain how the proposed recharge credit cap of 120,000 acre-feet was derived.

RESPONSE:

Please refer to the proposal documents and Proposal Correspondence for information pertinent to the derivation of the 120,000 acre-feet cap.

20. Please explain the adjustments to the proposed minimum index levels which resulted in proposed minimum index levels lower than the modeled results.

RESPONSE:

Please refer to the proposal documents and Proposal Correspondence.

21. Please explain if the ASR Permit Modification Proposal is in compliance with the District/City Phase I and Phase II MOUs.

RESPONSE

Counsel objects to the Interrogatory as invading work product and essentially seeking a legal analysis and opinion from the City's counsel rather than matters of fact calculated to lead to admissible evidence.

/s/ Brian K. McLeod

Brian K. McLeod, SC # 14026

Subject to and without waiving the foregoing objection, the City further responds as follows:

:

The City believes the substantive protections to domestic wells anticipated by the MOU's are present in Proposal and/or can be adequately addressed by actual permit conditions.

22. Please explain the level of input and assistance the Chief Engineer provided to You in the development of the Your ASR Permit Modification Proposal and when the assistance occurred.

RESPONSE:

Communication and input by from the Chief Engineer was standard for a project of this nature and did not deviate from the normal course. The City refers the District to the produced documents for its further answer to this Interrogatory.

Applicable communications or correspondence is provided in electronic form, as the subdirectory Proposal Communications. Additional detail may be available in the subdirectory Electronic Communications. Applicable meetings in which additional pertinent communications may have occurred are listed in the subdirectories DWR Meetings and GMD2 Meetings.

23. Specifically identify how the City of Wichita demonstrated to the Chief Engineer that these proposed changes to Wichita's existing aquifer and storage recovery program will not: 1) prejudicially and unreasonably affect the public interest, 2) impair existing water rights, nor 3) allow an unreasonable raising or lowering of the water level? Identify all the facts, studies, expert opinions, computer modeling and other information relied on by the City of Wichita in making such a demonstration to the Chief Engineer.



RESPONSE:

For information on how the City has addressed these topics to date, please refer to the proposal document and additional supplied information. To the extent that the demonstrations in question are also an object of the public hearing and subsequent administrative proceedings scheduled in this matter (and hence, ongoing), additional information will be made available to the District in the conduct of the administrative proceedings, as and when appropriate in accordance with the Prehearing Order and any subsequent directions of the Chief Engineer.

VERIFICATION

STATE OF KANSAS            )  
  ) ss.  
COUNTY OF SEDGWICK    )

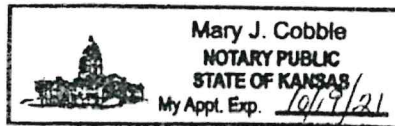
Joseph T. Pajor, being of lawful age and being duly sworn upon oath, deposes and states that he is the Deputy Director of Public Works and Utilities for the City of Wichita, Kansas, a party herein; that he has read the above and foregoing interrogatories and responses and that the answers, statements and allegations therein above contained are true and correct to the best of his information, knowledge and belief.

Joseph T. Pajor

SUBSCRIBED AND SWORN to before me, a Notary Public, in and for the aforesaid state and county, this 30<sup>th</sup> day of October, 2018.

Mary J. Cobble  
Notary Public

My Appointment Expires:  
10/19/21



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he or she served the above and foregoing Responses to Interrogatories upon counsel for the other parties herein by electronic mail, this 30<sup>th</sup> day of October, 2018, addressed to:

Thomas A. Adrian  
David J. Stucky  
[tom@aplawpa.com](mailto:tom@aplawpa.com)  
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Exhibit A

Documents Withheld Subject to Privilege And/or Work Product Doctrine

Brian McLeod email of June 12, 2015 to Alan King and Don Henry, re. GMD2 MOUs (attorney client privileged and work product)  
Undated, unsent Don Henry email screen with June 12, 2015 Brian McLeod email attached and no other content (attorney client privileged and work product).  
Brian McLeod email of March 30, 2107 re. ASR Permits & Recharge Credits (attorney-client privileged and work-product)  
Joe Pajor email of March 31, 2017 forwarding Brian McLeod March 30, 2017 email to other City recipients (attorney-client privileged and work product)  
Brian Meier's response of April 1, 2017 (attorney-client privilege and work product)  
Deb Ary's October 25, 2017 email to Brian McLeod re. Cochran Bentley Wellfield dispute (attorney-client privileged and work product and probably also irrelevant to this case)  
February 6, 2018 email of Don Henry to City Attorney Jennifer Magana, requesting legal assistance re ASR Permitting Process (attorney client privileged)  
February 6, 2018 email of Jennifer Magana responding to Don Henry request (attorney client privileged)  
March 1, 2018 email of Brian McLeod to Don Henry, regarding possible permit language (attorney client privileged and work product)  
March 1, 2018 email of Don Henry to Brian McLeod, regarding possible permit language (attorney client privileged and work product)  
August 1, 2018 email of Brian McLeod to Alan King, Joe Pajor and Scott Macey, regarding interrogatories sent to GMD2 (attorney client privileged and work product)  
Joe Pajor email of same date, internally forwarding August 1, 2018 Brian McLeod email to Don Henry (attorney client privileged and work product)  
Brian McLeod email of August 20, 2018 to Joe Pajor, Don Henning and Scott Macey, forwarding Allison Graber email and GMD2 discovery requests with commentary (attorney client privileged and work product)  
Brian McLeod email of August 20, 2018 to Don Henry and Scott Macey re. GMD2 discovery requests (attorney client privileged and work product)  
Scott Macey email of August 20, 2018 to Brian McLeod, and Brian McLeod responsive email re. forwarding GMD2 discovery requests (attorney client privileged and work product)  
Scott Macey email of August 20, 2018 to Brian McLeod, Joe Pajor and Don Henry, re. Upcoming Hearing (attorney client privileged and work product)  
Scott Macey email to Brian McLeod link of August 20, 2018, sharing email Records (attorney-client privileged and work product)  
Brian McLeod email of August 23, 2018 regarding KORA compliant (attorney client privileged)  
Scott Macey email of August 24, 2018 to Brian McLeod re. draft KORA complaint (attorney client privileged)  
Joe Pajor email of August 28, 2018 to Brian McLeod, re. request to IT in support of ASR permit modification hearing (attorney client privileged and work product)  
Brian Meier August 28, 2018 CONFIDENTIAL email to Brian McLeod, Joe Pajor, Scott Macey and Daniel Clement on responses to GMD2 discovery, and attachments (attorney client privileged and work product)  
Scott Macey August 30, 2018 email to Brian McLeod re. expert witness groups by response category (Attorney client privileged and work product)

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Additional Scott Macey August 30, 2018 email to Brian McLeod re. expert witness groups by response category (Attorney client privileged and work product)

Three August 31, 2018 communications from Scott Macey to Brian McLeod relating to ASR events calendar (attorney client privileged and work product)

Scott Macey August 31, 2018 email to Brian Meier regarding progress drafts of discovery responses, and its attachments (attorney client privileged and work product)

Scott Macey August 31, 2018 email to Joe Pajor regarding progress drafts of discovery responses, and its attachments (attorney client privileged and work product)

August 31, 2018 email of Scott Macey to Brian McLeod relating to ASR events calendar (attorney client privileged and work product)

August 31, 2018 email of Scott Macey to Brian Meier and Daniel Clement regarding ASR events calendar (work product)

September 4, 2018 email of Scott Macey to Brian McLeod and Don Henry re. Preliminary Expert Witness Disclosure (Attorney client privileged and work product)

September 4, 2018 email of Scott Macey to Brian McLeod, Brian Meier and Don Henry re. Preliminary Expert Witness Disclosure (Attorney client privileged and work product)

September 4, 2018 email of Scott Macey to Brian McLeod regarding expert resumes (attorney client privileged and work product).

September 4, 2018 email of Scott Macey to Burns & McDonnell staff and Brian McLeod regarding progress draft of expert witness overview (attorney client privileged and work product)

September 4, 2018 follow-up email of Scott Macey to Luca DeAngelis re. expert witness overview (work product)

September 4, 2018 Luca DeAngelis response (work product)

Daniel Clement email of 8/30/2018 to Scott Macey, Luca DeAngelis, Paul McCormick, Brian Meier , re. Summary of Credentials Request (work product)

Michael Jacobs email of 8/30/2018 to Stan Breitenbach, Scott Macey , re. On Call Task Orders (work product)

Paul McCormick email of 8/30/2018 to Scott Macey, Luca DeAngelis, Daniel Clement, Brian Meier , re. Summary of Credentials Request (work product)

Scott Macey email of 8/30/2018 to Luca DeAngelis, Paul McCormick, Daniel Clement , re. Summary of Credentials Request (work product)

Scott Macey email of 8/30/2018 to Brian McLeod, Daniel Clement, Joseph Pajor, Paul McCormick , re. Expert witness groups by response category (attorney client privileged and work product)

Scott Macey email of 8/30/2018 to Brian McLeod, Daniel Clement, Joseph Pajor, Paul McCormick , re. Expert witness groups by response category (attorney client privileged and work product)

Scott Macey email of 8/30/2018 to Nathan Dunahee, Brian Meier , re. Summary of Credentials Request (work product)

Scott Macey email of 8/30/2018 to Joseph Pajor, Brian McLeod , re. Outlook records (attorney client privileged and work product)

Joseph Pajor email of 8/31/2018 to Scott Macey, Don Henry, Brian McLeod , re. File Access (attorney client privileged)

Nathaniel Dunahee email of 8/31/2018 to Scott Macey , re. Summary of Credentials Request (work product)

Nathaniel Dunahee email of 8/31/2018 to Scott Macey , re. Summary of Credentials Request (work product)

Nathaniel Dunahee email of 8/31/2018 to Scott Macey, Brian Meier , re. Summary of Credentials Request (work product)

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Scott Macey email of 8/31/2018 to Brian Meier, Daniel Clement, Don Henry, Joseph Pajor , re. ASR Events Calendar (work product)

Scott Macey email of 8/31/2018 to Nathaniel Dunahee , re. Summary of Credentials Request (work product)

Scott Macey email of 8/31/2018 to Nathaniel Dunahee , re. Summary of Credentials Request (work product)

Scott Macey email of 8/31/2018 to Donald Koci, Tracy Streeter, Brian Meier , re. Request for your Presence as Expert witness (work product)

Scott Macey email of 8/31/2018 to Scott Macey , re. ASR Events Calendar (work product)

Scott Macey email of 8/31/2018 to Brian McLeod , re. ASR Events Calendar (attorney client privileged and work product)

Scott Macey email of 8/31/2018 to Brian McLeod , re. ASR Events Calendar (attorney client privileged and work product)

Scott Macey email of 8/31/2018 to Brian McLeod, Don Henry, Joseph Pajor , re. Wichita ASR proposal (attorney client privileged and work product)

Scott Macey email of 8/31/2018 to Joseph Pajor , re. Response to DWR GMD 4 (work product)

Scott Macey email of 8/31/2018 to Joseph Pajor, Don Henry, Brian McLeod , re. File Access (attorney client privileged and work product)

Donald Koci email of 9/3/2018 to Scott Macey, Brian Meier , re. Request for your Presence as Expert witness (work product)

cherwell email of 9/4/2018 to Joseph Pajor , re. Service Request 94552 has been resolved (attorney client privileged)

Brian McLeod email of 9/4/2018 to Alan King, Scott Macey, Jennifer Magana , re. This Just In (attorney client privileged)

Brian McLeod email of 9/4/2018 to Scott Macey, Alan King, Don Henry, Joseph Pajor , re. Resumes for expert witness (attorney client privileged)

Brian McLeod email of 9/4/2018 to Joseph Pajor , re. Wichita ASR Motion (attorney client privileged)

Brian Meier email of 9/4/2018 to Brian McLeod, Don Henry, Scott Macey, Daniel Clement , re. Request for your Presence as Expert witness (attorney client privileged)

Joseph Pajor email of 9/4/2018 to Alan King, Don Henry, Scott Macey, Brian Meier, Daniel W. Clement , re. Wichita ASR Motion (attorney client privileged)

Luca DeAngelis email of 9/4/2018 to Scott Macey , re. Wichita; Preliminary Expert Witness overview (work product)

Brian Meier email of 9/4/2018 to Joseph Pajor , re. Wichita ASR Motion (work product)

Scott Macey email of 9/4/2018 to Luca DeAngelis , re. Wichita; Preliminary Expert Witness overview (work product)

Scott Macey email of 9/4/2018 to Brian McLeod , re. Latest version of Preliminary Expert Disclosure (attorney client privileged and work product)

Scott Macey email of 9/4/2018 to Brian McLeod , re. Preliminary Expert Disclosure edits (attorney client privileged and work product)

Scott Macey email of 9/4/2018 to Brian McLeod , re. Resumes thus far (attorney client privileged and work product)

Scott Macey email of 9/4/2018 to Brian McLeod , re. Wichita; Preliminary Expert Witness overview (Luca DeAngelis) (attorney client privileged and work product)

Scott Macey email of 9/4/2018 to Brian Meier, Brian McLeod, Don Henry , re. Preliminary Expert Witnesses Due (attorney client privileged and work product)

Scott Macey email of 9/4/2018 to Brian Meier, Brian McLeod, Don Henry, Daniel Clement , re. Preliminary Expert Witnesses Due (attorney client privileged and work product)

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Scott Macey email of 9/4/2018 to Tracy Streeter , re. Request for your Presence as Expert witness (work product)

Brian Meier email of 9/5/2018 to Joseph Pajor, Alan King, Don Henry, Scott Macey, Daniel Clement , re. Wichita ASR Motion to Extend Time (work product)

Brian McLeod email of 9/6/2018 to Joseph Pajor , re. ARS application notice status and application processing (attorney client privileged)

Brian McLeod email of 9/6/2018 to Joseph Pajor , re. Required Notices (attorney client privileged)

Joseph Pajor email of 9/6/2018 to Scott Macey , re. In re. City of Wichita's Phase II ASR, 18 WATER 14014 (DWR) (attorney client privileged)

Joseph Pajor email of 9/6/2018 to Scott Macey , re. In re. City of Wichita's Phase II ASR, 18 WATER 14014 (DWR) (attorney client privileged)

Brian Meier email of 9/6/2018 to Joseph Pajor, Don Henry, Brian McLeod , re. ARS application notice status and application processing (attorney client privileged and work product)

Scott Macey email of 9/6/2018 to Don Henry , re. On Call Task Orders (work product)

Scott Macey email of 9/6/2018 to Michael Jacobs, Ary, Debra , Don Henry, Joseph Pajor, Brian McLeod , re. Email records to be shared with GMD2 (attorney client privileged and work product)

Scott Macey email of 9/6/2018 to Joseph Pajor , re. File Location (work product)

Scott Macey email of 9/6/2018 to Joseph Pajor , re. In re. City of Wichita's Phase II ASR, 18 WATER 14014 (DWR) (work product)

Brian McLeod email of 9/7/2018 to Alan King, Joseph Pajor , re. Required Notices (attorney client privileged)

Brian McLeod email of 9/7/2018 to Alan King, Joseph Pajor , re. Required Notices (attorney client privileged)

Joseph Pajor email of 9/7/2018 to Alan King, Don Henry, Scott Macey, Brian McLeod, Daniel Clement , re. Required Notices (attorney client privileged)

Ary, Debra email of 9/7/2018 to Scott Macey, Michael Jacobs, Don Henry, Joseph Pajor, Brian McLeod , re. Email records to be shared with GMD2 (attorney client privileged and work product)

Ary, Debra email of 9/7/2018 to Scott Macey, Brian McLeod , re. Email records to be shared with GMD2 (attorney client privileged and work product)

Scott Macey email of 9/7/2018 to Daniel Clement , re. ASR Proposed Minimum Index Levels (work product)

Scott Macey email of 9/7/2018 to Brian McLeod, Brian Meier, Daniel W. Clement , re. Wichita ASR Interrogatory Markup (attorney client privileged and work product)

Brian McLeod email of 9/10/2018 to Alan King, Joseph Pajor , re. Wichita ASR Update (attorney client privileged)

Brian McLeod email of 9/10/2018 to Alan King, Joseph Pajor, Don Henry , re. Cochran Case, Bentley Wellfield (attorney client privileged)

Brian McLeod email of 9/10/2018 to Scott Macey, Daniel Clement , re. RFA document edits (attorney client privileged)

Brian McLeod email of 9/10/2018 to Scott Macey, Daniel Clement , re. RFA document edits (attorney client privileged)

Brian McLeod email of 9/10/2018 to Joseph Pajor, Jennifer Magana , re. ASR Case (attorney client privileged)

Joseph Pajor email of 9/10/2018 to Don Henry, Scott Macey, Brian Meier (bmeier@burnsmcd.com), Daniel Clement , re. Wichita ASR Update (attorney client privileged)

Joseph Pajor email of 9/10/2018 to Alan King, Don Henry, Scott Macey, Brian Meier, Daniel W. Clement , re. ASR Case (attorney client privileged)

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Joseph Pajor email of 9/10/2018 to Alan King, Don Henry, Scott Macey, Brian McLeod, Daniel Clement , re. Wichita ASR Update (attorney client privileged)

Daniel Clement email of 9/10/2018 to Scott Macey , re. ASR Drought Modeling Report Supplemental Figures (work product)

Daniel Clement email of 9/10/2018 to Scott Macey, Brian McLeod, Scott Macey , re. RFA document edits (attorney client privileged and work product)

Scott Macey email of 9/10/2018 to Daniel Clement , re. ASR Drought Modeling Report Supplemental Figures (work product)

Scott Macey email of 9/10/2018 to Don Henry, Joseph Pajor, Brian McLeod , re. Sharing invitation (attorney client privileged and work product)

Scott Macey email of 9/10/2018 to Brian McLeod, Daniel Clement , re. RFA document edits (attorney client privileged and work product)

Brian McLeod email of 9/11/2018 to Joseph Pajor, Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

Brian McLeod email of 9/11/2018 to Joseph Pajor, Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

Joseph Pajor email of 9/11/2018 to Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

Joseph Pajor email of 9/11/2018 to Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

Brian Meier email of 9/11/2018 to Joseph Pajor , re. DWR Offer Suggestion (work product)

Brian Meier email of 9/11/2018 to Joseph Pajor , re. DWR Offer Suggestion (work product)

Scott Macey email of 9/11/2018 to Daniel Clement , re. ASR Drought Modeling Report Supplemental Figures (work product)

Brian McLeod email of 9/12/2018 to Scott Macey , re. RFA document edits (attorney client privileged)

Brian McLeod email of 9/12/2018 to Scott Macey, Joseph Pajor , re. DWR Offer Suggestion (attorney client privileged)

Brian McLeod email of 9/12/2018 to Joseph Pajor, Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

Brian McLeod email of 9/12/2018 to Joseph Pajor, Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

Joseph Pajor email of 9/12/2018 to Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

Joseph Pajor email of 9/12/2018 to Brian McLeod, Don Henry, Alan King, Daniel Clement , re. DWR Offer Suggestion (attorney client privileged)

McGown, Tyler email of 9/12/2018 to Scott Macey, Don Henry, Stan Breitenbach, Brian Meier, Daniel Clement , re. On Call Task Orders (work product)

Scott Macey email of 9/12/2018 to Brian McLeod, Joseph Pajor , re. DWR Offer Suggestion (work product)

Scott Macey email of 9/12/2018 to Brian McLeod, Joseph Pajor , re. DWR Offer Suggestion (work product)

Scott Macey email of 9/12/2018 to Brian McLeod , re. RFA document edits (work product)

Scott Macey email of 9/12/2018 to Brian Meier, Daniel Clement, Joseph Pajor , re. RFA document edits (work product)

Scott Macey email of 9/12/2018 to Brian McLeod, Daniel Clement, Brian Meier , re. RFA document edits (attorney client privileged and work product)

Scott Macey email of 9/12/2018 to Brian Meier , re. RFA document edits (work product)

Scott Macey email of 9/13/2018 to Brian McLeod , re. DWR Offer Suggestion (work product)

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Scott Macey email of 9/13/2018 to Brian McLeod, Joseph Pajor , re. GMD2 Videos (work product)  
Scott Macey email of 9/13/2018 to Brian McLeod, Joseph Pajor , re. GMD2 Videos (work product)  
Scott Macey email of 9/13/2018 to Brian McLeod, Joseph Pajor , re. Draft KORA request #3 (attorney client privileged and work product)  
Brian McLeod email of 9/14/2018 to Scott Macey , re. Email records to be shared with GMD2 (attorney client privileged)  
Brian McLeod email of 9/14/2018 to Scott Macey , re. Email records to be shared with GMD2 (attorney client privileged)  
Scott Macey email of 9/14/2018 to Don Henry , re. On Call Task Orders (work product)  
Scott Macey email of 9/14/2018 to John Winchester , re. Documents for Hearing (work product)  
Scott Macey email of 9/14/2018 to Brian McLeod , re. Email records to be shared with GMD2 (attorney client privileged and work product)  
Don Henry email of 9/17/2018 to Brian McLeod, Brian Meier, Scott Macey , re. ASR Permit Change Conference with Chief Engineer (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Don Henry, Scott Macey , re. ASR Permit Change Conference with Chief Engineer (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Don Henry, Brian Meier, Scott Macey , re. ASR Permit Change Conference with Chief Engineer (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Scott Macey , re. ROGS (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Scott Macey , re. Wichita ASR Interrogatory Markup (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Scott Macey , re. Wichita ASR Interrogatory Markup (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Scott Macey , re. Wichita Staff Bios (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Scott Macey , re. Wichita Staff Bios (attorney client privileged)  
Brian McLeod email of 9/17/2018 to Scott Macey , re. Wichita Staff Bios (attorney client privileged)  
John Winchester email of 9/17/2018 to Scott Macey , re. Documents for Hearing (work product)  
Brian Meier email of 9/17/2018 to Brian McLeod, Joseph Pajor, Don Henry, Scott Macey , re. GMD2 Request for Extension of Discovery Period and Delay of Evidentiary Hearing (attorney client privileged and work product)  
Brian Meier email of 9/17/2018 to Brian McLeod, Joseph Pajor, Don Henry, Scott Macey , re. GMD2 Request for Extension of Discovery Period and Delay of Evidentiary Hearing (attorney client privileged and work product)  
Scott Macey email of 9/17/2018 to Brian McLeod , re. ROGS (attorney client privileged and work product)  
Scott Macey email of 9/17/2018 to Brian McLeod , re. Wichita Staff Bios (attorney client privileged and work product)  
Brian McLeod email of 9/18/2018 to David Barfield, Kenneth Titus, Tom Adrian, dave@aplawpa.com , re. City's Preliminary Expert Disclosures (attorney client privileged)  
Brian McLeod email of 9/18/2018 to Scott Macey , re. FW (attorney client privileged)  
Brian Meier email of 9/18/2018 to Scott Macey , re. ASR 9am conf. call (work product)  
Brian Meier email of 9/18/2018 to Brian McLeod, Don Henry, Scott Macey , re. Proposed Hearing Schedule (attorney client privileged and work product)  
Brian Meier email of 9/18/2018 to Brian McLeod, Scott Macey, Don Henry , re. Proposed Hearing Schedule (attorney client privileged and work product)  
Scott Macey email of 9/18/2018 to Brian McLeod, Brian McLeod , re. ASR 9am conf. call (resend) (attorney client privileged and work product)

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Scott Macey email of 9/18/2018 to Brian McLeod, Brian McLeod , re. ASR 9am conf. call (attorney client privileged and work product)  
Scott Macey email of 9/18/2018 to Brian Meier, Daniel Clement, re. Required Notices (work product)  
Joseph Pajor email of 9/19/2018 to Brian Meier, Brian McLeod, Alan King, Don Henry , re. Application withdrawal cover letter JTP Edits (attorney client privileged)  
Brian Meier email of 9/19/2018 to Brian McLeod, Don Henry, Joseph Pajor, Scott Macey , re. Application Withdrawal Letter (attorney client privileged and work product)  
Scott Macey email of 9/19/2018 to Don Henry , re. Events Calendar to Crosscheck (work product)  
Scott Macey email of 9/19/2018 to Brian McLeod , re. Events Calendar to Crosscheck (attorney client privileged and work product)  
Scott Macey email of 9/19/2018 to Joseph Pajor , re. Events Calendar to Crosscheck (work product)  
Scott Macey email of 9/19/2018 to Tracy Streeter , re. Request for your Presence as Expert witness (work product)  
Tracy Streeter email of 9/19/2018 to Scott Macey , re. Request for your Presence as Expert witness (work product)  
Scott Macey email of 9/20/2018 to Scott Macey , re. DWR Meeting Minutes Revisions (work product)  
Scott Macey email of 9/20/2018 to Norman, Kevin, Joseph Pajor, Brian McLeod , re. Outlook Query issues (attorney client privileged and work product)  
Scott Macey email of 9/20/2018 to Norman, Kevin, Joseph Pajor, Brian McLeod , re. Outlook Query issues (attorney client privileged and work product)  
Brian McLeod email of 9/21/2018 to Joseph Pajor, Sharon Dickgrafe , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Brian McLeod email of 9/21/2018 to Joseph Pajor, Sharon Dickgrafe, Brian McLeod , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Sharon Dickgrafe email of 9/21/2018 to Brian McLeod, Joseph Pajor, Brian McLeod , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Sharon Dickgrafe email of 9/21/2018 to Joseph Pajor , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Joseph Pajor email of 9/21/2018 to Brian McLeod , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Joseph Pajor email of 9/21/2018 to Sharon Dickgrafe , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Joseph Pajor email of 9/21/2018 to Sharon Dickgrafe , Brian McLeod , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Joseph Pajor email of 9/21/2018 to Scott Macey , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)  
Scott Macey email of 9/21/2018 to Brian Meier, Joseph Pajor, Brian McLeod , re. DWR RFA cross reference (updated) (attorney client privileged and work product)  
Scott Macey email of 9/21/2018 to Brian Meier, Joseph Pajor, Brian McLeod , re. DWR RFA cross reference (attorney client privileged and work product)  
Scott Macey email of 9/21/2018 to Brian Meier, Joseph Pajor, Brian McLeod , re. DWR RFA cross reference (attorney client privileged and work product)  
Scott Macey email of 9/21/2018 to Joseph Pajor, Norman, Kevin, Brian McLeod , re. Subsets of outlook search results (attorney client privileged and work product)  
Scott Macey email of 9/21/2018 to Joseph Pajor, Norman, Kevin, Brian McLeod , re. Subsets of outlook search results (attorney client privileged and work product)  
Scott Macey email of 9/25/2018 to Strayer, Martha , re. Burns & McDonnell On Call (work product)

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Joseph Pajor email of 9/26/2018 to Alan King, Don Henry, Scott Macey, Brian Meier, Daniel W. Clement , re. In re Wichita's ASR Project, KDA case no. 18 WATER 14014 (attorney client privileged)

Joseph Pajor email of 9/26/2018 to Brian McLeod, Alan King, Don Henry , re. Cochran Case, Bentley Wellfield (attorney client privileged)

Brian McLeod email of 9/27/2018 to Joseph Pajor, Jennifer Magana , re. Cochran Argument Dates (attorney client privileged)

Paul McCormick email of 9/27/2018 to Scott Macey , re. Commentary on model changes (work product)

Scott Macey email of 9/27/2018 to Brian Meier, Paul McCormick, Daniel Clement , re. Writeup for tomorrow (work product)

Scott Macey email of 9/27/2018 to Bush, Shirley , re. Request for Copy of February 9, 2016 Letter from GMD No. 2 to Chief Engineer Ba (work product)

Scott Macey email of 9/27/2018 to Paul McCormick , re. Commentary on model changes (work product)

Brian McLeod email of 9/28/2018 to Scott Macey , re. ASR Data Transmittal Letter (attorney client privileged)

Brian McLeod email of 9/28/2018 to Scott Macey , re. ASR Data Transmittal Letter (attorney client privileged)

Paul McCormick email of 9/28/2018 to Scott Macey, Daniel Clement , re. Draft Report (work product)

Paul McCormick email of 9/28/2018 to Scott Macey, Brian Meier, Don Henry, Joseph Pajor, Daniel Clement , re. ASR Data Transmittal Letter (work product)

Brian Meier email of 9/28/2018 to Scott Macey, Paul McCormick, Daniel Clement , re. Writeup for tomorrow (work product)

Don Henry email of 9/28/2018 to Scott Macey , re. ASR Data Transmittal Letter (work product)

Don Henry email of 9/28/2018 to Scott Macey , re. Events Calendar to Crosscheck (work product)

Scott Macey email of 9/28/2018 to Brian Meier, Don Henry, Joseph Pajor, Paul McCormick , re. ASR Data Transmittal Letter (work product)

Scott Macey email of 9/28/2018 to Daniel Clement, Paul McCormick, Brian McLeod , re. ASR Data Transmittal Letter (attorney client privileged and work product)

Scott Macey email of 9/28/2018 to Don Henry , re. Events Calendar to Crosscheck (work product)

Scott Macey email of 9/28/2018 to Lane Letourneau , re. GMD2 letter request (work product)

Scott Macey email of 9/28/2018 to Lane Letourneau, Aaron Oleen, Alan King, Brian McLeod , re. ASR Groundwater Modeling Data Submittal (attorney client privileged and work product)

Scott Macey email of 9/28/2018 to Paul McCormick, Daniel Clement , re. Draft Report (work product)

Scott Macey email of 9/28/2018 to Brian McLeod , re. ASR Data Transmittal Letter (attorney client privileged and work product)

Scott Macey email of 9/28/2018 to Brian McLeod , re. ASR Data Transmittal Letter (attorney client privileged and work product)

Scott Macey email of 9/28/2018 to Brian McLeod , re. Draft Letter (attorney client privileged and work product)

Scott Macey email of 9/28/2018 to Brian McLeod , re. Edit (attorney client privileged and work product)

Scott Macey email of 9/28/2018 to Brian McLeod, Joseph Pajor , re. ASR Data Transmittal Letter (attorney client privileged and work product)

Scott Macey email of 9/28/2018 to Brian McLeod, Joseph Pajor , re. ASR Data Transmittal Letter (attorney client privileged and work product)

Brian McLeod email of 10/1/2018 to Alan King, Joseph Pajor, Don Henry, Scott Macey, Jennifer Magana , re. ASR Schedule (attorney client privileged)

Brian McLeod email of 10/1/2018 to Alan King, Joseph Pajor, Don Henry, Scott Macey, Jennifer Magana , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

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Brian McLeod email of 10/1/2018 to Joseph Pajor, Alan King, Don Henry, Scott Macey, Jennifer Magana , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Brian McLeod email of 10/1/2018 to Joseph Pajor, Alan King, Don Henry, Scott Macey, Jennifer Magana , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Joseph Pajor email of 10/1/2018 to Brian Meier, Daniel Clement , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Joseph Pajor email of 10/1/2018 to Brian McLeod, Alan King, Don Henry, Scott Macey, Jennifer Magana , re. ASR Schedule (attorney client privileged)

Joseph Pajor email of 10/1/2018 to Brian McLeod, Alan King, Don Henry, Scott Macey, Jennifer Magana , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Scott Macey email of 10/1/2018 to Bush, Shirley , re. Request for Copy of February 9, 2016 Letter from GMD No. 2 to Chief Engineer Ba (work product)

Scott Macey email of 10/1/2018 to Lane Letourneau , re. Letter to GMD 2 on ASR rule, moving forward (work product)

Scott Macey email of 10/1/2018 to Brian McLeod, Don Henry, Joseph Pajor , re. Scott Macey shared correspondence (attorney client privileged and work product)

Joseph Pajor email of 10/2/2018 to Brian McLeod, Brian McLeod, Alan King, Don Henry, Scott Macey , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Brian McLeod email of 10/3/2018 to Joseph Pajor , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Joseph Pajor email of 10/3/2018 to Brian McLeod , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Joseph Pajor email of 10/3/2018 to Brian McLeod , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Joseph Pajor email of 10/3/2018 to Alan King, Don Henry, Brian McLeod , re. Wichita ASR Minutes from September 18, 2018 Hearing (attorney client privileged)

Brian Meier email of 10/3/2018 to Joseph Pajor, Alan King, Don Henry, Scott Macey, Daniel Clement , re. In re Wichita's ASR Project, KDA case no. 18 WATER 14014 (work product)

Scott Macey email of 10/4/2018 to Brian McLeod , re. Draft Verbiage for Letter RE Phase 1 (attorney client privileged and work product)

Scott Macey email of 10/4/2018 to Tracy Streeter , re. Request for your Presence as Expert witness (work product)

Brian McLeod email of 10/16/2018 to Brian Meier, Joseph Pajor, Alan King, Don Henry, Daniel Clement , re. Wichita ASR Schedule (attorney client privileged)

Scott Macey email of 10/18/2018 to Brian McLeod , re. Coordination (attorney client privileged and work product)

Scott Macey email of 10/18/2018 to Brian McLeod , re. Coordination (attorney client privileged and work product)

Brian McLeod email of 10/19/2018 to Scott Macey , re. Subsets of outlook search results (attorney client privileged)

Scott Macey email of 10/19/2018 to Scott Macey , re. DWR Meetings Calendar (work product)

Scott Macey email of 10/19/2018 to Scott Macey , re. GMD2 Events Calendar (work product)

Scott Macey email of 10/19/2018 to Brian McLeod , re. Draft Production of Documents (attorney client privileged and work product)

Scott Macey email of 10/19/2018 to Brian McLeod , re. Subsets of outlook search results (attorney client privileged and work product)

Scott Macey email of 10/19/2018 to Brian McLeod, Joseph Pajor , re. Subsets of outlook search results (attorney client privileged and work product)

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Scott Macey email of 10/19/2018 to Brian McLeod, Joseph Pajor, Don Henry , re. Subsets of outlook search results (attorney client privileged and work product)

Scott Macey email of 10/22/2018 to Brian Meier, Daniel Clement , re. Draft Production of Documents (work product)

Scott Macey email of 10/22/2018 to Brian Meier, Daniel Clement , re. proposal correspondence to share (work product)

Scott Macey email of 10/22/2018 to Daniel Clement, Brian Meier , re. Exhibit List (work product)

Scott Macey email of 10/22/2018 to Daniel Clement, Brian Meier, Brian McLeod , re. Exhibit List (revised) (attorney client privileged and work product)

Scott Macey email of 10/22/2018 to Brian McLeod , re. Expert Witness Format (attorney client privileged and work product)

Scott Macey email of 10/22/2018 to Brian McLeod , re. proposal correspondence to share (attorney client privileged and work product)

Scott Macey email of 10/22/2018 to Brian McLeod, Joseph Pajor, Don Henry, Brian Meier , re. Draft Expert Report (attorney client privileged and work product)

Brian McLeod email of 10/23/2018 to Schawe, Colleen, Scott Macey , re. Expert Witness Format (attorney client privileged)

Scott Macey email of 10/23/2018 to John Winchester , re. Hearing (work product)

Scott Macey email of 10/23/2018 to Brian McLeod , re. Expert Witness Format (attorney client privileged and work product)

Scott Macey email of 10/23/2018 to Joseph Pajor, Don Henry , re. Hearing (work product)

Scott Macey email of 10/24/2018 to Penny Feist , re. ASR Website Update (work product)

Scott Macey email of 10/24/2018 to Penny Feist, Jennifer Hart , re. ASR Website Update (work product)

Scott Macey email of 10/24/2018 to Jennifer Hart , re. ASR Website Update (work product)

Scott Macey email of 10/24/2018 to Jennifer Hart , re. ASR Website Update (work product)

Scott Macey email of 10/24/2018 to Jennifer Hart , re. Files to add to Wichita.gov website (work product)

Scott Macey email of 10/24/2018 to John Winchester, Luca DeAngelis, Nathaniel Dunahee, Brian Meier , re. ASR Permit Change Interrogatory Responses (work product)

Scott Macey email of 10/24/2018 to Alan King, Joseph Pajor, Don Henry, Brian McLeod, Brian Meier , re. ASR Permit Change Interrogatory Responses (attorney client privileged and work product)

Scott Macey email of 10/24/2018 to Joseph Pajor, Don Henry, Brian McLeod , re. ASR Permit Change Interrogatory Responses (attorney client privileged and work product)

Nelson, Ben email of 10/24/2018 to Scott Macey , re. 1% Drought (work product)

Brian McLeod email of 10/25/2018 to Scott Macey , re. City Responses to Admission Requests (attorney client privileged)

Daniel Clement email of 10/25/2018 to Scott Macey , re. ASR Permits and Regs Legal Review (work product)

McGown, Tyler email of 10/25/2018 to Scott Macey, Brian Meier, Daniel Clement , re. On Call Task Orders (work product)

Scott Macey email of 10/25/2018 to Daniel Clement , re. ASR Permits and Regs Legal Review (work product)

Scott Macey email of 10/25/2018 to Jennifer Hart , re. more files (work product)

Scott Macey email of 10/25/2018 to Jennifer Hart , re. more files (work product)

Scott Macey email of 10/25/2018 to Michael Jacobs, Don Henry , re. On Call Task Orders (work product)

Scott Macey email of 10/25/2018 to McGown, Tyler, Brian Meier, Daniel Clement , re. On Call Task Orders (work product)

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Exhibit B: SUMMARY OF EXPERT WITNESS CONTRIBUTIONS	King	Fajor	Henry	Macey	Meier	Koci	Winchester	Clement	McCormick	DeAngels	Dunahee	Streeter
Proposal Cover Letter	X	X	X		X							
1.0 Introduction	X	X	X		X							
2.0 proposed ASR minimum index levels	X	X	X	X				X	X	X	X	
Table 2-1: City of Wichita Drought Response Plan (DRP) Stages	X	X	X	X				X	X	X	X	X
2.1 1% Drought Reconstruction - Palmer Drought Severity Index (PDSI)				X			X	X				X
Table 2-2: 1% Drought Reconstruction from PDSI				X			X	X				X
2.2 City of Wichita - Future Raw Water Demand Assessment		X	X	X								X
2.3 Integrated Water Resources Management During a 1% Drought Using MODSIM-DSS				X			X	X				X
Figure 1 - MODSIM DSS Network GUI				X			X	X				
Table 2-3: MODSIM-DSS simulation results for the 1% drought utilizing projected 2060 demands				X			X	X				
2.4 Groundwater Modeling Setup - 1% Drought Simulation								X	X			
Figure 2 - Simulated Conditions of 1% Drought Demand on Cheney Reservoir				X				X				
2.4.1 Stress Period (SP) Development								X	X			
Figure 3 - USGS Equus Beds Groundwater Flow Model Active Model Boundary								X	X	X		
Table 2-4: PDSI values for South-Central Kansas							X	X	X	X		
Table 2-5: Water Variables and Inputs to the EBGWM by Stress Period								X	X	X		
2.4.2 Starting Groundwater Model Elevations				X				X	X	X		
2.4.3 Groundwater Pumping - Agricultural Irrigation, Industrial Use, Other Municipal Users								X	X	X		
Table 2-6: Net Irrigation Use in the 1% Drought Model								X	X	X		
2.4.4 Groundwater Pumping - City of Wichita				X				X	X	X		
Table 2-7: Distributed City of Wichita Pumping by Stress Period								X	X	X		
2.4.5 Streamflow - Arkansas River, Little Arkansas River, Cow Creek								X	X	X		
2.4.6 Precipitation & Natural Aquifer Recharge								X	X	X		
Figure 4 - Locations of USGS Stream Gages Within and Near the ASR BSA								X	X	X		
Table 2-8: Simulated Natural Aquifer Recharge Inputs for EBGWM								X	X	X		
2.4.7 Evaporation & Transpiration								X	X			
2.5 Groundwater Modeling Results ... 1% Drought Simulation								X	X			
Table 2-9: Groundwater Modeling Results for 1% Drought Simulation								X	X			
2.6 Proposed Modifications to ASR Minimum Index Water Levels								X	X			
Figure 5 - Initial Groundwater Elevations at Beginning of Simulated Drought								X	X			
Figure 6 - Modeled Groundwater Elevations at the End of Simulated Drought (SP8)								X	X			
Figure 7 - Modeled Groundwater Elevations End of Simulated Recovery Year 1 (SP9)								X	X			
Figure 8 - Groundwater Elevations End of Simulated Recovery Year 2 (SP10)								X	X			
Figure 9 - 1993 Groundwater Levels as a Percentage of Predevelopment Saturated Aquifer Thickness								X	X			
Figure 10 - Modeled Aquifer Conditions by ASR Index Cell at the End of Simulated Drought (SP8)								X	X			
2.7 Summary								X	X			
Table 2-10: Development of Proposed ASR Minimum Index Levels								X	X			
Table 2-11: Proposed ASR Minimum Index Levels								X	X			
Figure 11 - Average Aquifer Conditions by Index Cell at Proposed Minimum Levels								X	X			

EXHIBIT B  
 SUMMARY OF EXPERT WITNESS CONTRIBUTIONS  
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Exhibit B: SUMMARY OF EXPERT WITNESS CONTRIBUTIONS		King	Pajor	Henry	Macey	Meier	Koci	Winchester	Clement	McCormick	DeAngelis	Dunahee	Streeter
3.0	Aquifer Maintenance Credits proposal	x	x	x									
3.1	Integrated Local Water Supply Plan (ILWSP)		x	x		x	x						
3.2	City of Wichita ASR Program Development		x	x		x	x						
	Figure 12 - Historic Water Use in the ASR BSA				x				x				
	Figure 13 - Historic Groundwater Level Changes in the ASR BSA				x				x				
3.3	Benefits of ASR Aquifer Maintenance Credits (AMCs)		x	x		x	x						
3.4	Proposed AMC Permit Conditions		x	x		x	x						
3.5	ASR Physical Recharge & ASR Operations Plan				x	x			x		x		
3.6	Outcome Based Management of Water Resources		x	x		x	x						
	Table 3-1: Benefits to Multiple Aquifer Users and Water Resources from AMCs		x	x		x	x						
	Figure 14 - AMC Operations Table 2016 Example				x				x				
4.0	Proposed ASR Accounting Methodology					x	x		x	x			
	Figure 15 - ASR Accounting Loss Percentage Map								x	x			
	Table 4-1: Index Cell Infrastructure and Loss Percentage								x	x			
	Figure 16 - Current and Proposed Accounting Method Results Comparison								x	x			
	Table 4-2: Current and Proposed Accounting Method Results Comparison								x	x			
	Table 4-3: Theoretical Recharge Accounting Example for Index Cell 15								x	x			
Attachment A	City of Wichita Drought Response Plan	x	x	x	x								
Attachment B	Palmer Drought Severity Index, Research Paper No. 45							x	x				
Attachment C	HCH 1% Drought Reconstruction Technical Memorandum				x			x					
Attachment D	City of Wichita Water Demand Assessment		x	x	x			x					
Attachment E	USGS SIR 2013-5042 Groundwater Model Report				x				x		x		
Attachment F	Historic NOAA PDSI Values for SC Kansas				x			x	x				
Attachment G	Streamflows for Arkansas, Little Arkansas River 2011-2012								x	x			
Attachment H	USGS SIR 2013-5170, Revised 1993 Groundwater Levels				x				x	x			
Attachment I	Drought Model Simulation Results & Hydrographs								x	x			
Attachment J	ASR Accounting Simulations								x	x			

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