



Mr. David Barfield, P.E.
Chief Engineer
Division of Water Resources – KDA
1320 Research Park Drive
Manhattan, Kansas 66502

July 25, 2018

WATER RESOURCES
RECEIVED

JUL 27 2018

KS DEPT OF AGRICULTURE

Dear Chief Engineer Barfield:

RE: Additional Comments on Draft Master Order dated May 4, 2018, Cities of Hays & Russell Contingent Approval of Change Applications regarding R9 Water Rights

1. The Draft Master Order includes a summary of the groundwater modeling work completed by the cities' consultant. Since the model they utilized is the basis by which you as Chief Engineer have determined that 48,000 Acre-Feet diversion from the R9 Ranch in any 10 year consecutive period is sustainable, Water PACK is asking for and recommends comparison plots of the modeled water levels for the calibration/verification, baseline, and municipal well scenarios (both the short-term {1991-2007} and long term {1991-2041} runs) as compared to the observed water levels for the 10 well locations that Water PACK plotted and Dr. Andy Keller reported on in his June 21st recorded presentation.
2. The Draft Master Order contains the Ten-Year Rolling Average Limitation (total of 48,000 Acre-Feet diversion from the R9 Ranch in any 10-year consecutive period). The Draft Order also contains clauses to either increase or remove all together this limitation under certain circumstances as spelled out in the Order. The Draft Order says nothing about potentially decreasing the limitation. Therefore, Water Pack is asking for and recommends language to be added to allow for a decrease in the Ten-Year Rolling Aggregate Limitation should the 10 year rolling average groundwater levels in the R9 Ranch vicinity be observed to be declining at a rate greater than anticipated and beyond what is sustainable. There needs to be a way to reduce pumping for transfer if it is found in implementation that the modeling was wrong and water levels are declining unsustainably.

Thank you for your consideration of these important additional comments.

Sincerely yours,

Kent L. Moore, President
Board of Directors