IN THE OFFICE OF THE STATE ENGINEER OF THE STATE OF NEVADA

IN THE MATTER OF APPLICATIONS 53987 THROUGH 53992, INCLUSIVE, AND 54003 THROUGH 54021, INCLUSIVE, FILED TO APPROPRIATE THE UNDERGROUND WATERS OF SPRING VALLEY, CAVE VALLEY, DELAMAR VALLEY, AND DRY LAKE VALLEY HYDROGRAPHIC BASINS (180, 181, 182 AND 184), LINCOLN COUNTY AND WHITE PINE COUNTY, NEVADA	)	SECOND WITNESS AND EXHIBIT LIST FOR MILLARD AND JUAB COUNTIES

Millard County, Utah and Juab County, Utah, through their undersigned counsel, submit the following Second Witness and Exhibit list, with a reasonably detailed summary of the testimony of each witness.

Second List of Potential Witnesses and Summaries of Their Expected Testimony

1. Dr. Victor Heilweil
U.S. Geological Survey
Utah Water Science Center

Dr. Heilweil will testify as an expert witness. The substance of Dr. Heilweil's expected testimony is set forth in the report marked as Mill Exh __. In summary, Dr Heilweil believes that the groundwater withdrawals SNWA proposes in Spring Valley approach or exceed previously published estimates of total groundwater discharge from Spring Valley and therefore would capture most if not all of current groundwater discharge from Spring Valley including spring flow, groundwater ET, and well withdrawals, as well as capture groundwater from adjacent hydraulically-connected valleys, particularly where parts f those valleys are closer than more-distant parts of Spring Valley to the proposed pumping centers. Further Dr. Heilweil believes there is a subsurface hydraulic connection having substantial transmissivity between Spring Valley and Snake Valley. Further Dr. Heilweil believes the proposed SNWA well withdrawals would likely cause groundwater level declines and depletion of groundwater storage, and ultimately would cause a reduction in or a reversal of subsurface groundwater flow from Spring Valley to Snake Valley, a reduction in spring flow and groundwater evapotranspiration (ETg) in Snake Valley,

and/or a reduction in groundwater availability to current water users in Snake Valley. Further Dr. Heilweil believes continued and expanded monitoring of groundwater levels and spring discharge in both Spring and Snake Valleys is necessary for evaluating potential effects of increased well withdrawals, including the need to implement the Stipulated Agreement, Management and Monitoring Plans and expand the groundwater monitoring program to include Snake Valley and other hydraulically connected basins.

2. Hugh Hurlow, Hugh Hurlow, Ph.D. P.G.
Senior Scientist
Ground Water & Paleontology Program
Utah Geological Survey

Dr. Hurlow will testify as an expert witness. The substance of Dr. Hurlow's expected testimony is set forth in the report marked as Mill Exh __. In summary, Dr. Hurlow concludes from available geologic and hydrologic data that (1) subsurface interbasin flow from southern Spring Valley to southern Snake Valley forms a significant part of the hydrologic system of southern Snake Valley, (2) drawdown of groundwater levels from the proposed pumping in southern Spring Valley would drastically reduce, eliminate, or even reverse this interbasin flow, and (3) the southern Snake Valley groundwater system is currently sensitive to present stresses (groundwater pumping, changes in recharge), therefore decreasing recharge to this system by reducing interbasin flow would cause groundwater levels and spring flow to decline. Dr. Hurlow believes that that the groundwater monitoring and mitigation plan for the interbasin flow area outlined in the previous Spring Valley Stipulated Agreement between SNWA and the DOI Bureaus should be incorporated if water rights are granted, with the addition of selected UGS groundwater monitoring sites within the initial biological monitoring zone, and that the monitoring and mitigation program remain in place for several tens of years to track changes in groundwater levels and flow from the proposed pumping.

Second List of Potential Exhibits

MILL_Exh_009	Second Witness and Exhibit List for Millard and Juab Counties
MILL_Exh_010	Expert Testimony Report by Dr. Victor M. Heilweil, U.S. Geological Survey, Utah Water Science Center, August 24, 2011
MILL_Exh_011	Expert Testimony Report by Dr. Hugh A.Hurlow, Senior Scientist Utah Geological Survey, Entitled Intebasin Groundwater Flow From Southern Spring Valley to Northern Hamlin Valley and Southern Snake Valley, West Central Utah and Nevada: Comments on Estimates of Flow Rate, Possible Effects of Proposed Groundwater Development in Southern Spring Valley, and Groundwater Monitoring, August 2011
MILL_Exh_012	AQUIFER TEST—Analysis of multiple-well aquifer test of carbonate-rock aquifer, southeastern Spring Valley, HA184, near Great Basin National Park, NV, January 18, 2010
MILL_Exh_013	AQUIFER TEST—Analysis of BS-SW single-well aquifer test of carbonate-rock aquifer, southwestern Snake Valley, HA195, near Great Basin National Park, NV, November 25, 2010
MILL_Exh_014	Bredehoeft, et al, Groundwater - The Water Budget Myth, 1982
MILL_Exh_015	Victor M.Heilweil CV, August 23, 2011
MILL_Exh_016	HA694A_Plume & Carlton
MILL_Exh_017	HA694B Sheet2 Thomas et al
MILL_Exh_018	HA694C Sheet2 Harrill et al
MILL_Exh_019	Harrill Prudic 1998
MILL_Exh_020	PotentiometricMap Gardner & Plume
MILL_Exh_021	PP1409B Plate Plume
MILL_Exh_022	sir20075089 plate1 WilsonPotMap
MILL_Exh_023	sir20075261_Plate01_Sweetkind
MILL_Exh_024	sir20115032_Halford
MILL_Exh_025	Theis 1957

MILL_Exh_026	wrir95-4173 Shaefer & Harrill
MILL_Exh_027	Presentation - Great Basin Carbon and Aluvial Aquifer System Study, October, 2009
MILL_Exh_028	Presentation - Snake Valley Groundwater, April, 2011
MILL Exh 029	GBCAAS_Abstract
MILL_Exh_030	GBCAAS Appendix01
MILL_Exh_031	GBCAAS Appendix02
MILL_Exh_032	GBCAAS Appendix03
MILL_Exh_033	GBCAAS Appendix04
MILL_Exh_034	GBCAAS Appendix05
MILL_Exh_035	GBCAAS Appendix06
MILL_Exh_036	GBCAAS Appendix07
MILL_Exh_037	GBCAAS Appendix08
MILL_Exh_038	GBCAAS Chapter A
MILL_Exh_039	GBCAAS Chapter B
MILL_Exh_040	GBCAAS Chapter C
MILL_Exh_041	GBCAAS Chapter D
MILL_Exh_042	GBCAAS Cover
MILL_Exh_043	GBCAAS Plate 01
MILL_Exh_044	GBCAAS Plate 02
MILL_Exh_045	Auxiliary1 mdm
MILL_Exh_046	Auxiliary2 mdm
MILL_Exh_047	Auxiliary3 mdm
MILL_Exh_048	Auxiliary4 mdm

MILL_Exh_049	Auxiliary5 mdm
MILL_Exh_050	Auxiliary6_mdm
MILL_Exh_051	table A8-1 mdm
MILL_Exh_052	Hurlow Figure 1 - Generalized location map of southern Spring Valley and southern Snake Valley, and selected hydrologic features.
MILL_Exh_053	Hurlow Figure 2 - Annotated detail from potentiometric surface map of Gardner and others (2011).

Respectfully submitted this 25th day of August, 2011.

*/s/ J. Mark Ward*_____

J. Mark Ward, Admitted Pro Hac Vice
Utah State Bar #4436
5397 South Vine Street
Murray, Utah 84107

John B. Rhodes, NV Bar #1353
P.O. Box 18191
Reno, Nevada 89511
Phone (775) 849-2525

Attorneys for Protestants Millard County, Utah
and Juab County, Utah