

EskDale Center
1100 Circle Drive
EskDale, UT 84728

EskDale Center Remand Hearing Comments

October 18, 2017

EskDale Center still believes that the proposed withdrawals from Spring Valley will have an impact on the aquifer levels in Snake Valley, and that SNWA's proposed MMM procedures are not adequate to prevent such interbasin effects.

Specifically, the trending methodologies are more likely to be used to justify SNWA's position rather than protect the resources they are related to. In the case of shallow aquifer wells such as those used for agricultural purposes, the trending approaches cannot reflect the specific conditions in thin water-bearing strata separated by thicker non-porous layers of clay as is common in Spring and Snake Valleys.

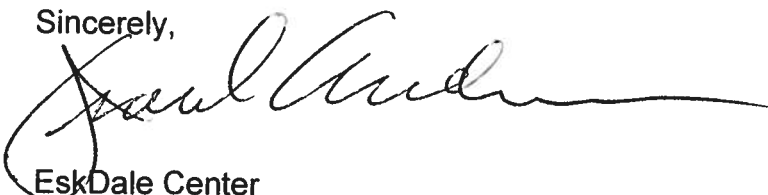
Such aquifer characteristics produce discrete incremental reductions in groundwater availability rather than a linear reduction in pumping capacity and associated drawdown during pumping. As a layer ceases to yield groundwater flow into the well column, its contribution to yield is eliminated, not reduced. In addition, such layers tend to consolidate and will not necessarily return to its prior yield when the water table recovers over time. Such water-bearing strata are not identical within each well, nor are they comparable between wells located thousands of feet apart. This renders SNWA's linear trending methodology useless in forecasting or avoiding long-term impacts at a particular well location.

SNWA's MMM approach will likely tend to degrade the aquifer for pumping, since typical well depths in the EskDale Center are less than 120' and most well intakes are set between 80' and 100'. Using their protocol will most likely result in new wells being drilled to 250' or more with costs for higher horsepower pumping equipment and associated operating costs. This MMM approach may result in blame or compensation, but will not be able to avoid long-term impacts.

Aquifer recharge response in the EskDale area from snowmelt takes from 15 to 18 months based on our observations. Without some predictive methodology in these areas the MMM process will only be reactionary and management of the groundwater resource for pumping cannot be effective.

We urge the State Engineer to require the development and application of more sophisticated predictive MMM techniques to avoid, not just mitigate, impacts for locations such as EskDale Center.

Sincerely,



EskDale Center
Jerald Anderson, Representative

STATE ENGINEERS OFFICE

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