COLORADO
Division of Water Resources
Department of Natural Resources

July 20, 2020

Mr. Rick Parsons, P.E.
Parsons Water Consulting, LLC
1619 Minear Road
Medford, Or 97501

Re: M&G Substitute Water Supply Plan (WDID 0202503)
M&G Pit, DRMS No. M-1986-079, (WDID 0203063)
Section 3, Township 2 South, Range 67 West, 6th P.M.
Water Division 1, Water District 2, Weld County
SWSP ID: 3304

Approval Period: June 10, 2020 through December 31, 2030
Contact information for Mr. Parsons: (303) 667-5067 and rick.parsons@parsonswater.com

Dear Mr. Parsons:

We have reviewed your June 10, 2020 request for the renewal of the Substitute Water Supply Plan ("SWSP") for the above mentioned gravel pit, to cover the depletions caused by an existing mining operation. The current SWSP was approved on February 1, 2018 and expired on March 31, 2020. The required $257 fee to renew the SWSP has been submitted (receipt no. 10003991).

Plan Operation

The M&G Pit (aka Polly Mann Pit) was previously operated by Lafarge West, Inc. On May 12, 2011, the Division of Mining, Reclamation, and Safety ("DRMS") approved a succession of operators from Lafarge to Mann Resources LLC ("Applicant") for this operation. Mann Resources is now the permitted operator of this Pit and has assumed all reclamation responsibilities for the site. Mining has completed at the site and as of June 10, 2020 the backfilling has been completed so that no exposed acreage remains at the site. This SWSP seeks to replace continuing lagged depletions from evaporation associated with previously exposed groundwater at M&G Pit using recharge accretion credits from Fulton Irrigation Ditch Company (WDID 0200808) shares that were previously diverted into the pit for recharge.

Note that the approval of this SWSP does not relieve the Applicant and/or landowner of the requirement to obtain future SWSPs or a Water Court decree approving a permanent plan for augmentation or mitigation to ensure the long-term lagged depletions are replaced after gravel mining operations have ceased. As of June 10, 2020, backfilling operations, which consisted of filling the pit with inert material were complete and no exposed groundwater remained. The Applicant indicates that lagged depletions associated

with previously exposed groundwater on the site will extend until December 2030. Continued operation under an approved SWSP or decreed plan for augmentation will be required until all lagged depletions from the M&G Pit are replaced.

Depletions

The depletions that will be covered by this SWSP are limited to ongoing lagged depletions caused by previous evaporation from the ground water exposed to the atmosphere, all of which occurred after December 31, 1980. According to the information submitted, no water surface was exposed within the reclamation permit boundary prior to January 1, 1981.

Gross evaporation at this site was estimated to be 43.9 inches per year based on NOAA NWS-33. Effective precipitation is estimated at 70% of the average monthly precipitation recorded at NOAA Brighton 1 NE climate station and is estimated to be 9.8 inches per year. Because depletions from this site do not impact the river instantaneously the applicant's consultant lagged the depletions to the South Platte River using the Integrated Decision Support group's Alluvial Water Accounting System (IDS AWAS) stream depletion model with the following assumptions:

- Distance from the centroid to the river (X) = 1,500 feet
- Alluvial aquifer width (W) = 18,500 feet
- Transmissivity (T) = 100,000 gallons per day per foot
- Specific Yield (S) = 0.2

The stream depletion model shows the stream depletions to hit the river during this SWSP approval period to be 45.1 acre-feet from June 2020 through December 2030. Monthly breakdowns of the lagged depletions are shown on attached Table 1.

Replacement

Depletions from the site will continue to impact the South Platte River downstream of the Brantner Ditch headgate and upstream of the Brighton Ditch headgate. To source of replacement water will be recharge accretion credits from the water attributable to 49 Fulton Ditch shares that were delivered into the pit during the irrigation season in 2013, 2014, 2015, 2016, 2017, 2018, and 2019

Parkfield Partners, LLC owns 49 shares of the Fulton Irrigation Ditch Company (Stock Certificate No. 3905) which were historically used on the Polly Mann property. In total 150 Fulton Ditch shares were used by Frank Mann on the 108 acre property located below the Fulton Ditch (equivalent to the M&G pit permitted area) and 25 acres located above the Fulton Ditch.

A revised historical consumptive use (HCU) analysis was submitted with the previous SWSP request. The HCU analysis was based on the total of 50 shares (49 shares owned by Parkfield Partners LLC and one share owned by the City of Thornton). The period of analysis was 1957 through 1989. Historical diversion data recorded for irrigation use were tabulated and the pro-rata diversions attributable to the 50 shares were input into the StateCU model. For the study period chosen, diversion records for the Fulton Ditch were downloaded from Hydrobase database. Daily diversions for the Fulton Ditch were adjusted to include only the diversion up to 204.18 cfs (the maximum decreed diversion rate of the Fulton Ditch water rights). The

average annual diversion over the study period was 26,043 acre-feet with an average of 3.63 acre-feet per share for the 7,185 total outstanding shares in the ditch.

Over a 33-year study period, the average pro rata river diversion for the Polly Mann property was 180.1 acre-feet per year, which translates to a historic farm headgate delivery of 144.0 acre feet per year, or 2.88 acre-feet per share per year. The average irrigation water requirement (IWR) for the Polly Mann property was found to be 124.5 acre-feet per year which was based on 46.1 acres of irrigation evenly split between alfalfa, corn, and pasture grass. In total the historic consumptive use for the Polly Mann property was found to be 93.9 acre-feet per year, or 1.87 acre-feet per share per year. The pro-rata portion of the historic consumptive use associated with the Applicants 49 shares is 92.0 acre-feet per year. The surface water, or tailwater, runoff averaged 16.7 acre-feet per year and the deep percolation runoff averaged 33.6 acre-feet per year.

In 2013, 2014, 2015, 2016, 2017, 2018, and 2019 the water attributable to a portion of the 49 Fulton Ditch shares was delivered into the pit during the irrigation season. The **deliveries to the Polly Mann pit for recharge were limited to the annual long term average of 141.1 acre-feet or the monthly values listed in the table below:**

Deliveries limitation to the Polly Mann Pit for recharge

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
0.0	0.0	0.0	6.9	16.9	25.2	35.5	31.7	18.0	7.1	0.0	0.0	141.1

The farm headgate deliveries associated with the 49 shares, minus the summer return flow requirements, were delivered to the pit and lagged to the river. The lagged recharge credit will be used to replace out-of-priority lagged evaporation depletions. The accounting associated with this SWSP shows that all winter return flows associated with the 49 Fulton Ditch shares were replaced by the previous SWSP approval.

The monthly depletions and replacement requirements are found on the attached Table 1.

Conditions of Approval

I hereby approve the proposed substitute water supply plan in accordance with §37-90-137(11), C.R.S., subject to the following conditions:

1. This plan shall be valid for the period of June 10, 2020 through December 31, 2030, unless otherwise revoked or superseded by decree.

2. **No groundwater exposure is allowed under this SWSP**. Well permit no. 55520-F was issued in accordance with C.R.S. § 37-90-137(2) and (11). The Applicant shall request that permit no. 55520-F be cancelled since the site has been backfilled.

3. Replacements under this SWSP are limited to the lagged depletions associated with previous evaporation losses at the site. The total post evaporation depletion at the M&G Pit during this SWSP period shall not exceed 45.1 acre-feet.

4. Approval of this plan is for the purposes as stated herein. No use of ground water at this site is allowed under this SWSP.

5. The replacement water that is the subject of this plan cannot be sold or leased to any other entity. As a condition of subsequent renewals of this substitute water supply plan, the replacement water must be appurtenant to this site until a plan for augmentation is obtained. All replacement water must be concurrent with depletions in quantity, timing, and locations.

6. Adequate accounting of depletions and replacements must be provided to the Division Engineer (Div1Accounting@state.co.us), the water commissioner (Jorge Vidal at Jorge.Vidal@state.co.us) on and the river operation coordinator (Brent Schantz at Brent.Schantz@state.co.us) a monthly basis. The accounting must be submitted within 30 calendar days of the end of the month for which the accounting is being made and conform to the Administration Protocol *"Augmentation Plan Accounting, Division One – South Platte River"* (attached).

7. All diversions of the Fulton Ditch shares into the pit for recharge were measured in a manner acceptable to the division engineer or water commissioner. According to the information provided by the water commissioner the Sutron Stage Discharge Recorded required for the recharge operation identified in the previous SWSP has been installed and approved.

8. The name, mailing address, and phone number of the contact person who will be responsible for operation and accounting of this plan must be provided on the accounting forms to the division engineer and water commissioner.

9. The State Engineer may revoke this SWSP or add additional restrictions to its operation if at any time the State Engineer determines that injury to other vested water rights has occurred or will occur as a result of the operation of this SWSP. Should this substitute water supply plan expire without renewal or be revoked prior to adjudication of a permanent plan for augmentation, all excavation of product from below the water table, and all other use of water at the pit, must cease immediately.

10. The approval of this substitute water supply plan does not relieve the Applicant and/or landowner of the requirement to obtain a Water Court decree approving a permanent plan for augmentation or mitigation to ensure the permanent replacement of all depletions, including long-term evaporation losses and lagged depletions after gravel mining operations have ceased. If reclamation of the mine site will produce a permanent water surface exposing groundwater to evaporation, an application for a plan for augmentation must be filed with the Division 1 Water Court at least three (3) years prior to the completion of mining to include, but not be limited to, long-term evaporation losses and lagged depletions. If a lined pond results after reclamation, replacement of lagged depletions shall continue until there is no longer an effect on stream flow. Granting of this SWSP does not imply approval by this office of any such court application(s).

11. In accordance with amendments to Section §25-8-202-(7), C.R.S. and Senate Bill 89-181 Rules and Regulations adopted on February 4, 1992, the State Engineer shall determine if this substitute water supply plan is of a quality to meet requirements of use to which the senior appropriation receiving the substitute supply has normally been put. As such, water quality data or analyses may be requested at any time to determine if the requirement of use of the senior appropriator is met.

12. The decision of the state engineer shall have no precedential or evidentiary force, shall not create any presumptions, shift the burden of proof, or serve as a defense in any pending water court case or any other legal action that may be initiated concerning this plan. This decision shall not bind the state engineer to act in a similar manner in any other applications involving other plans, or in any proposed renewal of this plan, and shall not imply concurrence with any findings of fact or conclusions of law contained herein, or with the engineering methodologies used by the Applicant.

Please contact Ioana Comaniciu in Denver at (303) 866-3581, or Dean Santistevan in Greeley at dean.santistevan@state.co.us, if you have any questions concerning this approval.

Sincerely,

Jeff Deatherage, P.E.
Chief of Water Supply

Attachments: Table 1
Administration Protocol *"Augmentation Plan Accounting, Division One – South Platte River"*

Ec: Dean Santistevan, Assistant Division Engineer, Dean.Santistevan@state.co.us
Jorge Vidal, Water Commissioner, District 2, Jorge.Vidal@state.co.us
Brent Schantz, River Operations & Compact Coordinator, Brent.Schantz@state.co.us
Division of Reclamation, Mining and Safety

JD/JMW/idc: M&G Pit_M86-079(20-30).docx

Table 1

3/14/2014 with 15% reduction in surface area starting in April 2014

1/9/2015 reduction in surface area down to 20.83 starting in June 2014

1/24/2018 reduction in surface area down to 15.5 starting in Oct 2017

10/2/2018 reduction in surface area down to 14.23 starting in Sep 2018

9/24/2019 reduction in surface area down to 11.4 starting in Aug 2019 down to zero in Mar 2020

LAGGED DEPLETIONS

	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
1986	0.31	0.71	0.94	1.17	2.2	3.83	6.12	7.66	8.8	8.48	7.28	6.06
1987	4.02	2.9	2.48	2.25	3.18	4.62	6.81	8.24	9.33	8.95	7.69	6.44
1988	4.35	3.21	2.77	2.57	3.4	4.84	7.03	8.44	9.52	9.13	7.86	6.61
1989	4.51	3.37	2.92	2.62	3.57	4.98	7.16	8.56	9.64	9.26	7.97	6.72
1990	4.61	3.48	3.03	2.72	3.67	5.07	7.26	8.66	9.74	9.35	8.06	6.81
1991	4.7	3.57	3.11	2.8	3.75	5.15	7.34	8.73	9.82	9.43	8.14	6.89
1992	4.77	3.64	3.18	2.94	3.8	5.21	7.4	8.79	9.88	9.49	8.19	6.95
1993	4.83	3.7	3.24	2.91	3.88	5.27	7.46	8.85	9.94	9.54	8.25	7
1994	4.88	3.75	3.29	2.96	3.93	5.32	7.51	8.9	9.98	9.59	8.29	7.05
1995	4.92	3.79	3.34	2.99	3.97	5.36	7.55	8.93	10.02	9.63	8.33	7.08
1996	4.96	3.83	3.37	3.12	3.98	5.38	7.58	8.96	10.05	9.65	8.35	7.11
1997	4.98	3.86	3.4	3.05	4.03	5.42	7.61	8.99	10.08	9.68	8.38	7.14
1998	5.01	3.88	3.42	3.07	4.05	5.44	7.64	9.01	10.1	9.71	8.4	7.16
1999	5.03	3.9	3.45	3.09	4.07	5.46	7.65	9.03	10.12	9.72	8.42	7.18
2000	5.05	3.92	3.46	3.2	4.07	5.47	7.66	9.04	10.13	9.74	8.43	7.19
2001	5.06	3.93	3.48	3.12	4.1	5.49	7.68	9.06	10.15	9.75	8.45	7.21
2002	5.07	3.95	3.49	3.13	4.12	5.5	7.7	9.07	10.16	9.76	8.46	7.22
2003	5.09	3.96	3.5	3.14	4.13	5.51	7.71	9.08	10.17	9.77	8.47	7.23
2004	5.09	3.97	3.51	3.24	4.11	5.51	7.71	9.08	10.18	9.78	8.47	7.23
2005	5.1	3.97	3.51	3.15	4.14	5.53	7.72	9.09	10.19	9.79	8.48	7.24
2006	5.11	3.98	3.52	3.16	4.15	5.53	7.73	9.1	10.19	9.79	8.49	7.25
2007	5.11	3.98	3.53	3.16	4.15	5.54	7.73	9.1	10.2	9.8	8.49	7.25
2008	5.12	3.99	3.53	3.26	4.13	5.53	7.73	9.1	10.2	9.8	8.49	7.25
2009	5.12	3.99	3.53	3.17	4.16	5.54	7.74	9.11	10.2	9.8	8.5	7.26
2010	5.12	4	3.54	3.17	4.16	5.55	7.74	9.11	10.21	9.81	8.5	7.26
2011	5.13	4	3.54	3.18	4.17	5.55	7.74	9.12	10.21	9.81	8.5	7.26
2012	5.13	4	3.54	3.27	4.14	5.54	7.74	9.11	10.21	9.81	8.5	7.26
2013	5.13	4	3.54	3.18	4.17	5.55	7.75	9.12	10.21	9.81	8.5	7.27
2014	5.13	4	3.54	3.18	4.17	5.23	6.94	7.72	8.28	7.88	6.82	5.86
2015	4.21	3.35	2.98	2.67	3.43	4.45	6.11	7.13	7.95	7.65	6.64	5.71
2016	4.08	3.23	2.88	2.66	3.33	4.37	6.04	7.06	7.89	7.59	6.59	5.66
2017	4.04	3.19	2.84	2.55	3.31	4.35	6	7.03	7.86	7.56	6.56	5.4
2018	3.71	2.94	2.59	2.27	2.84	3.57	4.79	5.52	6.13	5.89	5.04	4.28
2019	3.1	2.5	2.24	2	2.53	3.22	4.35	5.04	5.6	5.12	4.22	3.62
2020	2.64	2.1	1.79	1.48	1.38	1.18	1.12	1.01	0.99	0.94	0.87	0.87
2021	0.81	0.81	0.78	0.69	0.74	0.7	0.7	0.66	0.67	0.66	0.62	0.63
2022	0.6	0.61	0.59	0.53	0.57	0.55	0.55	0.53	0.54	0.53	0.5	0.51
2023	0.49	0.49	0.49	0.43	0.47	0.45	0.46	0.44	0.44	0.44	0.42	0.42
2024	0.4	0.41	0.41	0.37	0.39	0.38	0.38	0.36	0.37	0.37	0.35	0.35
2025	0.34	0.34	0.34	0.3	0.33	0.31	0.32	0.31	0.31	0.31	0.29	0.3

2026	0.28	0.29	0.28	0.25	0.28	0.26	0.27	0.26	0.26	0.26	0.24	0.25
2027	0.24	0.24	0.24	0.21	0.23	0.22	0.23	0.21	0.22	0.22	0.21	0.21
2028	0.2	0.2	0.2	0.18	0.19	0.19	0.19	0.18	0.18	0.18	0.17	0.18
2029	0.17	0.17	0.17	0.15	0.16	0.16	0.16	0.15	0.15	0.15	0.14	0.15
2030	0.14	0.14	0.14	0.13	0.14	0.13	0.13	0.13	0.13	0.13	0.12	0.12

LAGGED RECHARGE CREDITS

Recharge	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
2013	0	0	0	0	0	0	5	10.04	12.18	12.8	15.17	15.82
2014	9.46	4.87	3.2	2.15	1.87	9.5	18.87	21.62	23.34	24.85	20.92	15.28
2015	9.45	5.93	4.33	3.11	2.85	10.36	19.69	22.35	24.03	25.49	21.5	15.83
2016	9.95	6.42	4.79	3.62	3.26	2.71	3.2	10.46	15.66	13.87	12.56	9.16
2017	4.96	3.73	2.99	2.29	2.22	1.91	8.8	15.47	15.17	13.45	10.59	6.73
2018	4.13	3.27	2.69	2.1	2.06	2.18	3.66	6.53	6.43	5.12	6.47	5.67
2019	3.19	2.38	1.96	1.54	1.54	1.71	5.05	9.65	14.81	15.91	10.76	6.1
2020	3.82	3.02	2.47	1.98	1.88	1.63	1.54	1.38	1.33	1.25	1.14	1.12
2021	1.04	1.03	0.99	0.86	0.92	0.86	0.86	0.81	0.82	0.8	0.75	0.76
2022	0.72	0.72	0.71	0.63	0.68	0.65	0.66	0.62	0.63	0.62	0.59	0.6
2023	0.57	0.58	0.57	0.51	0.55	0.53	0.54	0.51	0.52	0.51	0.49	0.5
2024	0.47	0.48	0.47	0.44	0.46	0.44	0.45	0.43	0.43	0.43	0.41	0.41
2025	0.4	0.4	0.4	0.35	0.39	0.37	0.37	0.36	0.36	0.36	0.34	0.35
2026	0.33	0.34	0.33	0.3	0.32	0.31	0.31	0.3	0.3	0.3	0.29	0.29
2027	0.28	0.28	0.28	0.25	0.27	0.26	0.26	0.25	0.26	0.25	0.24	0.24
2028	0.23	0.24	0.23	0.22	0.23	0.22	0.22	0.21	0.21	0.21	0.2	0.2
2029	0.2	0.2	0.2	0.17	0.19	0.18	0.19	0.18	0.18	0.18	0.17	0.17
2030	0.16	0.17	0.16	0.15	0.16	0.15	0.16	0.15	0.15	0.15	0.14	0.14

ADMINISTRATION PROTOCOL
Augmentation Plan Accounting
Division One – South Platte River

This protocol establishes the accounting and reporting process required to enable the division engineer's office to confirm that depletions from all out-of-priority diversions are being replaced so as to prevent injury to vested water rights. The accounting must comport with established "cradle to grave" accounting standards, which allow an audit of the information to track exactly how the data is manipulated as it is translated from raw input data to the resultant impact on the river. While this protocol is subordinate to any decreed language addressing specific accounting requirements, it generally addresses the minimum requirements of such accounting.

The accounting must use the standard convention where a depletion is "negative" and an accretion or other replacement source is "positive". The sum of the impacts will then result in either a "negative" or "positive" impact on the stream.

Wells in plans that have a negative stream impact must provide additional replacement water, curtail pumping or both until the impact is no longer negative. Plans with a negative stream impact that fail to curtail pumping will be ordered to stop pumping until such time as the projected impact of the wells is no longer negative.

1. Accounting must be submitted electronically to the water commissioner (call 970-352-8712 to obtain email address) and division engineer at Div1Accounting@state.co.us within 30 days of the end of the month for which the accounting is being submitted.
2. The accounting must provide the **contact information** including name and address for:
    a. the owner(s) of each well
    b. the person responsible for submitting the accounting
    c. the plan administrator and/or the plan attorney.
3. All **input data** must be in one location, such as an "Input" worksheet, etc. The accounting must show all pumping. Input data includes the information listed below.
    a. The required input data for each **well** is:
        i. the monthly meter reading for wells that use a **presumptive depletion factor** (PDF) to determine the associated consumptive use (CU); or
        ii. the monthly CU in acre-feet (AF) for wells that have a decree or approved SWSP that allows the wells to use a **water balance methodology** to determine the CU of the well. The analysis used to determine the CU must be included with the accounting.
        iii. Wells that are decreed as an **alternate point of diversion** (APOD) to a surface water right must report pumping on a daily basis if any of the diversion during the month is claimed as being "in priority". (See *Administration Protocol – APOD Wells* for more details.)

iv. The well meter serial readings for each meter shall be included if there is more than one meter on a well.

b. Each **recharge site** must comply with the *Administration Protocol - Recharge* and must report the:

i. daily volume in AF diverted into the site;

ii. monthly volume in AF released from the site;

iii. monthly net evaporative loss in AF;

iv. volume of water in AF remaining at the end of the month.

c. The accounting must identify each source of **fully consumable replacement water** actually delivered to the location impacted by the depletions. To demonstrate the water was actually delivered to the required location will require the following information:

i. the originating source of the water, date released and volume of water released;

ii. transportation losses to point of diversion or use, if any, using stream loss factors approved by the water commissioner;

iii. the volume of water actually delivered on a daily basis past any surface water diversion that was sweeping the river as corroborated by the water commissioner.

(See *Administration Protocol – Delivery of Water* for more details on delivering water.)

d. For each source of **replacement water that has been "changed"** for use as a source of augmentation, such as changed reservoir shares, ditch bypass credits or credits from dry-up, etc., the following input information must be reported:

i. the basis and volume of the return flow obligation;

ii. the location the changed water was historically used; this will be the location used to determine the timing of the return flow impact on the river.

4. The accounting must include a monthly **projection** of the plan's operation at least through March 31 of the next calendar year.

5. The accounting must include all input and output files associated with **modeling the delayed impact** of diversions. The output from the modeling must report to a summary table that shows, by month, the ongoing depletions associated with pumping, return flow obligations, etc. and accretions from recharge operations.

6. A **net impact** summary must show the out-of-priority depletions, accretions from each recharge site, volume of replacement water actually delivered to the location of the depletions and the resultant net impact on **a daily basis**. If necessary, the net impact must be done by river reach.

   While **modeling** may use a **monthly step function** to determine the depletions from pumping and accretions from recharge, the monthly result must then be **divided by the number of days in the month** in order to **simulate a daily impact**, as water rights are administered on a daily and not monthly basis.

Replacement water must be provided such that the **daily net impact** (using the simulated daily numbers from the modeling) **is not negative**. If a well is out-of-priority for 15 days during a month, replacement must be made only for the 15 days the well is out-of-priority. The replacement must be made, however, on a daily basis as opposed to, for instance, making an aggregated release equal to the volume of the out-of-priority depletions. Likewise, the simulated daily accretion will only count toward replacing the depletion on the days the well is out-of-priority. The accretions that report to the river when the well is in priority cannot be used to replace the out-of-priority depletions.

The **accretions that impact the river when the well is in priority** are not considered "excess" unless the cumulative net impact of the well is not negative for the entire irrigation year to date. (The irrigation year for this purpose is April 1 thru the following March 31.) Until such time as the cumulative net impact is not negative, the accretions must simply be released to the river and cannot be leased to other plans or recaptured. Plans that show a positive cumulative net impact are still required to make replacements on a daily basis; the cumulative analysis only effects whether or not accretions reporting to the river when the well is in priority are considered "excess" and are, therefore, able to be recaptured.

7. The basis for determining that the depletions are **out-of-priority** must be clearly established and all steps in the calculation included in the accounting. The analysis may be done, unless otherwise limited by decree, for each well or groups of wells, provided the most junior water right associated with the group of wells is used as the reference water right for the group's out-of-priority status.
8. Accounting must include **actual information** for the irrigation year through the month for which the accounting is being submitted **AND projections** of the plan operation through March 31 of the next calendar year.
9. The following **naming convention** must be used for all files submitted pursuant to item 1:

   "Plan**WDID**_YYMMDD"

   where: PlanWDID is the WDID assigned by the division engineer's office
   YYMMDD corresponds to the date the accounting is submitted.

   As an example, the assigned WDID for the former GASP plan was 0103333. If accounting using Excel® was submitted for that plan on May 15, 2004, the file name would be:

   "0103333_040515.xls"

   The name of the file must be in the subject line of the email.
10. All accounting must be reported using the **WDID** for the structure, at a minimum. Other information such as well name, permit number, etc. may also be included as desired. <u>All wells must be decreed by the water court, permitted by the state engineer or included in a decreed plan for augmentation</u>. Unregistered and undecreed wells cannot, in the opinion of the division engineer, be effectively administered because of the need to know the location, allowable diversion rate and use of the well - information that is only available from the decree or permitting process.

11. If a well is covered in multiple SWSP's or augmentation plans, the monthly meter readings must be the same in the accounting for each plan covering the subject well. The accounting for every plan covering the well shall state the proportionate pumping amount covered by each plan to assure all out-of-priority depletions are replaced.

12. The following additional accounting is required for sources of replacement water used for more than one plan. The water right owner of the replacement water is responsible for accounting for the total replacement amount and how much each plan is using of that total amount. The accounting for portions of the replacement water by other users must match the accounting of the water right owner. The amount of replacement water used by the water right owner and other users together shall not exceed the total replacement amount available.

    (See *Administration Protocol – Use Of Unnamed Sources For Replacement* for additional requirements concerning required notice and approval of sources of replacement not specifically described in a SWSP or augmentation plan*)*