

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF APACHE

APACHE CO. SUPERIOR COURT
FILED

IN RE THE GENERAL ADJUDICATION OF ALL RIGHTS TO USE
WATER IN THE LITTLE COLORADO RIVER SYSTEM AND SOURCE

NO. _____ DOCKETED

No. 6417 MAY 24 1991

RECOMMENDED FORM
FOR OBJECTIONS TO THE
Hydrographic Survey Report for the
Silver Creek Watershed

O'CLOCK 1:03P M.
RICHARD D. LUPKE, CLERK
AP DEPUTY

Please file a separate objection for each watershed file report. Objections to information contained in Volumes 1 & 2 can be stated on one objection form. Objections must be written. Use of this form is suggested. Objections must be received on or before May 29, 1991.

This Objection is directed to Watershed File Report No. 033- 56 - 073 - _____
(please insert no.)

OBJECTOR INFORMATION

Objector's Name: Arizona State Land Department
Objector's Address: 1616 West Adams
Phoenix, Arizona 85007
Objector's Telephone No.: (602) 542-3500

Objector's Watershed File Report No. (if the Objector's claimed water rights are located within the Silver Creek Watershed):

033- _____ - _____ - _____

Or Objector's Statement of Claimant No. (if the Objector's claimed water rights are located outside the Silver Creek Watershed):

39- _____

STATEMENT OF THE OBJECTION

The following are the main categories of the typical watershed file report (not all watershed file reports have all these categories). Please check the category(ies) of the watershed file report to which you object, and state the reason for the objection on the following page.

Please check appropriate box(es)

- 1. I object to the description of Land Ownership
- 2. I object to the description of Applicable Filings and Decrees
- 3. I object to the description of DWR's Analysis of Filings and Decrees
- 4. I object to the description of the Diversions for the claimed water right(s)
- 5. I object to the description of the Uses for the claimed water right(s)
- 6. I object to the description of Reservoirs used for the claimed water right(s)
- 7. I object to the description of Shared Uses & Diversions for the claimed water right(s)
- 8. I object to the PWR (Potential Water Right) Summary of the claimed water right(s)
- 9. I object to the description of Quantities of Use for the claimed water right(s)
- 10. I object to the Explanation provided for the claimed water right(s)
- 11. Other Objections (please state volume number, page number and line number for each objection)

The reason for my objection is as follows (please number your objections to correspond to the boxes checked above; please attach supporting information and additional pages as necessary):

CATEGORY NUMBER

9 Description is incomplete because it lacks an annual volume

I hereby make this Objection on this 24th day of May, 1991.

STATE LAND COMMISSIONER

Signature of Objector

FOR: STATE OF ARIZONA (State Land Department)
(if in a representative capacity)

STATE OF ARIZONA
COUNTY OF MARICOPA

VERIFICATION
(Must be completed by Objector)

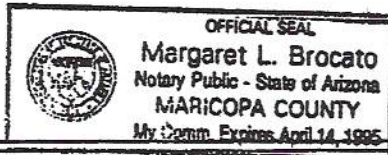
I declare under penalty of perjury that I am a claimant in this proceeding; that I have read the contents of the foregoing Objection and know the contents thereof; and that the information contained in the foregoing Objection is true based on my own personal knowledge, except for those portions of the Objection which are indicated as being known to me on information and belief and, as to those portions, I believe them to be true.

STATE LAND COMMISSIONER

Signature of Objector

SUBSCRIBED AND SWORN to before me this 24th day of May, 1991.

(SEAL)



Margaret L. Brocato

Notary Public for the State of ARIZONA

Residing at 1616 W. Adams, Phoenix, Arizona 85007

My commission expires _____

CERTIFICATE OF MAILING

(Must be completed if you object to another Claimant's watershed file report. Does not need to be completed if you file an Objection to your own watershed file report or to information contained in Volumes 1 or 2 of the Hydrographic Survey Report.)

I hereby certify that a copy of the foregoing Objection was served upon the following Claimant(s) by mailing true and correct copies thereof on the 24th day of May, 1991, postage prepaid and addressed as follows:

Name: Lakeside Irrigation Co.
Address: P.O. Box 101 or Box 296
Lakeside, Arizona 85929

(Signature of Objector or person mailing in Objector's behalf)

Objections must be filed with the Clerk of the Superior Court in and for Apache County, Apache, County Courthouse, P. O. Box 365, St. Johns, AZ 85936, on or before May 29, 1991. This means that the Objection must be received at the Clerk's office no later than 5:00 p.m. on Wednesday, May 29, 1991.

6417-033-03287

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF APACHE

COPY

IN RE THE GENERAL ADJUDICATION OF ALL RIGHTS TO USE
WATER IN THE LITTLE COLORADO RIVER SYSTEM AND SOURCE

APACHE CO SUPERIOR COURT
No. 6417 FILED
NO. _____ DOCKETED

MAY 29 1991

RECOMMENDED FORM
FOR OBJECTIONS TO THE
Hydrographic Survey Report for the
Silver Creek Watershed

AT _____ O'Clock 1:45P M
RICHARD D. LUPKE, CLERK
SP

Please file a separate objection for each watershed file report. Objections to information contained in Volumes 1 & 2 can be stated on one objection form. Objections must be written. Use of this form is suggested. Objections must be received on or before May 29, 1991.

This Objection is directed to Watershed File Report No. 033- 56 - 073 - _____
(please insert no.)

OBJECTOR INFORMATION

Objector's Name: Arizona Game & Fish Commission
Objector's Address: 2222 West Greenway Road
Phoenix, Arizona 85023
Objector's Telephone No.: (602) 942-3000
Objector's Watershed File Report No. (if the Objector's claimed water rights are located within the Silver Creek Watershed):
033- _____ - _____ - _____

Or Objector's Statement of Claimant No. (if the Objector's claimed water rights are located outside the Silver Creek Watershed):
39- _____

STATEMENT OF THE OBJECTION

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- 11. Other Objections (please state volume number, page number and line number for each objection)

The reason for my objection is as follows (please number your objections to correspond to the boxes checked above; please attach supporting information and additional pages as necessary):

CATEGORY NUMBER

9 Description is incomplete because it lacks an annual volume

I hereby make this Objection on this 23rd day of May, 1991. Arizona Game & Fish Commission

Duane L. Shroufe
Signature of Objector
Duane L. Shroufe,
FOR: Secretary to the Commission
(If in a representative capacity)

STATE OF ARIZONA
COUNTY OF MARICOPA

VERIFICATION
(Must be completed by Objector)

I declare under penalty of perjury that I am a claimant in this proceeding; that I have read the contents of the foregoing Objection and know the contents thereof; and that the information contained in the foregoing Objection is true based on my own personal knowledge, except for those portions of the Objection which are indicated as being known to me on information and belief and, as to those portions, I believe them to be true.

Duane L. Shroufe
Signature of Objector Duane L. Shroufe,
Secretary to the Commission

SUBSCRIBED AND SWORN to before me this 23rd day of May, 1991

(SEAL)

Margaret E. Rattler
Notary Public for the State of ARIZONA
Residing at 2102 W. Markham Dr. Phoenix
My commission expires Mar. 3, 1995

CERTIFICATE OF MAILING

(Must be completed if you object to another Claimant's watershed file report. Does not need to be completed if you file an Objection to your own watershed file report or to information contained in Volumes 1 or 2 of the Hydrographic Survey Report.)

I hereby certify that a copy of the foregoing Objection was served upon the following Claimant(s) by mailing true and correct copies thereof on the 29th day of May, 1991, postage prepaid and addressed as follows:

Name: Lakeside Irrigation Co.
Address: P.O. Box 101 or Box 296
Lakeside, Arizona 85929

Janice Leavell
(Signature of Objector or person mailing in Objector's behalf)

Objections must be filed with the Clerk of the Superior Court in and for Apache County, Apache, County Courthouse, P. O. Box 365, St. Johns, AZ 85936, on or before May 29, 1991. This means that the Objection must be received at the Clerk's office no later than 5:00 p.m. on Wednesday, May 29, 1991.

6417 - 033 - 03155

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF APACHE

IN RE THE GENERAL ADJUDICATION OF ALL RIGHTS TO USE
WATER IN THE LITTLE COLORADO RIVER SYSTEM AND SOURCE

No. 6417

RECOMMENDED FORM
FOR OBJECTIONS TO THE
Hydrographic Survey Report for the
Silver Creek Watershed

Please file a separate objection for each watershed file report. Objections to information contained in Volumes 1 & 2 can be stated on one objection form. Objections must be written. Use of this form is suggested. Objections must be received on or before May 29, 1991.

This Objection is directed to Watershed File Report No.

033- 56 - 073

(please insert no.)

OBJECTOR INFORMATION

Objector's Name: United States of America
Objector's Address: P.O. Box 607, Albuquerque, New Mexico 87103
Objector's Telephone No.: (505) 766 - 1060
Objector's Watershed File Report No. (if the Objector's claimed water rights are located within the Silver Creek Watershed):
033- 42 - 088 -

Or Objector's Statement of Claimant No. (if the Objector's claimed water rights are located outside the Silver Creek Watershed):

39-

STATEMENT OF THE OBJECTION

The following are the main categories of the typical watershed file report (not all watershed file reports have all these categories). Please check the category(ies) of the watershed file report to which you object, and state the reason for the objection on the following page.

Please check
appropriate box(es)

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- 3. I object to the description of DWR's Analysis of Filings and Decrees
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- 10. I object to the Explanation provided for the claimed water right(s)
- 11. Other Objections (please state volume number, page number and line number for each objection)

The reason for my objection is as follows (please number your objections to correspond to the boxes checked and please attach supporting information and additional pages as necessary):

CATEGORY
NUMBER

SEE ATTACHED SHEET(S)

I hereby make this Objection on this 28 day of May, 1991

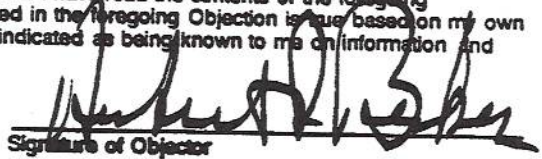

Signature of Objector

FOR: United States of America
(If in a representative capacity)

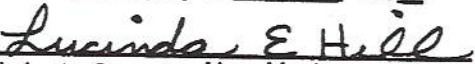
STATE OF New Mexico } VERIFICATION

COUNTY OF Bernalillo } (Must be completed by Objector)

I declare under penalty of perjury that I am a claimant in this proceeding; that I have read the contents of the foregoing Objection and know the contents thereof; and that the information contained in the foregoing Objection is true based on my own personal knowledge, except for those portions of the Objection which are indicated as being known to me on information and belief and, as to those portions, I believe them to be true.


Signature of Objector

SUBSCRIBED AND SWORN to before me this 28 day of May, 1991.


Notary Public for the State of New Mexico
Residing at Albuquerque
My commission expires 7-21-92

(SEAL)


CERTIFICATE OF MAILING

(Must be completed if you object to another Claimant's watershed file report. Does not need to be completed if you file an Objection to your own watershed file report or to information contained in Volumes 1 or 2 of the Hydrographic Survey Report.)

I hereby certify that a copy of the foregoing Objection was served upon the following Claimant(s) by mailing true and correct copies thereof on the 28th day of May, 1991, postage prepaid and addressed as follows:

LAKESIDE IRRIGATION CO.
P.O. BOX 101 OR BOX 296
LAKESIDE AZ 85929

03356 073


(Signature of Objector or person mailing in Objector's behalf)

Objections must be filed with the Clerk of the Superior Court in and for Apache County, Apache County Courthouse, P.O. Box 365, St. Johns, AZ 85936, on or before May 29, 1991. This means that the Objection must be received at the Clerk's office no later than 5:00 p.m. on Wednesday, May 29, 1991.

WFR #: 033-56-073

1. **There are supplemental use claims made by individual landowners from sources of supply in addition to the water delivered to these tracts by the Lakeside Irrigation Company. Supplemental adjudication filings should be identified as such.**

The claimant has not provided sufficient information to indicate that they have the right to provide water to the privately owned lands indicated under their claimed place of use.

There is no documentation presented that the claimant has the legal right to use a source of supply (Adair Springs) and develop appurtenant water delivery facilities on property it does not own.

2. **ADWR indicated, in their summary of applicable filings and decrees, that there were no domestic uses cited under 36-65549. These use locations and the corresponding water amounts should be deducted from this claim. Apparently all water users under the Lakeside Irrigation Company obtain their domestic water from private wells. Therefore filing 39-0084141 should be rejected for all domestic use.**

Land owned by Donald Earl (033-59-ACAC-063) was recently developed and is only entitled to a 1985 priority date.

There are claims for storage facilities which were constructed after 1919 for which there are no permits of record in the name of the Lakeside Irrigation Company.

There are errors in the pre-adjudication and adjudication filings as to place of use. Domestic uses are not adequately defined and differentiated from irrigation uses. The basis of the 200 acre-feet of domestic claim is not identified. Storage rights are not differentiated from direct flow rights.

3. **Individual landowners in the claimed service area have made claims for supplemental water supplies to the primary source of supply from Adair Spring. The filings must be identified as supplemental sources of supply.**
4. **Diversion SO1 is for the exclusive use of the Lakeside Irrigation Company and is not shared with any other irrigation company.**
5. **All domestic uses associated with this claim should be rejected. ADWR found no domestic service at any location listed under 39-0084141 and 36-65549.**

There is no detailed legal description presented in the adjudication filing which documents the location of the claimed service areas so that a comparison can be made with actual use areas.

Lakeside Irrigation Company has a claimed service area which includes several private irrigation tracts.

WFR #: 033-56-073

- 7. This diversion is not shared with any other irrigation company.**
- 8. The priority dates assigned to this watershed file report by ADWR are unsubstantiated by either the information provided by the claimant or by sources in the historic record.**

Supplemental use claims are made by some landowners to tracts served by the LIC. Additional water sources should be designated as supplemental sources of supply only.

Multiple priority dates should be established, as appropriate, for the irrigated land base.

ADWR recognized no irrigation storage rights. Therefore, the 18 AF storage claims is invalid.

- 9. The quantity of domestic use claimed under 39-0084141 and 36-65549 should be rejected since ADWR discovered that no domestic use was found.**

The average efficient water duty of 5.5 acre-ft/acre estimated by ADWR is unreasonable. The maximum annual water duty estimated for the individual landowner by ADWR is too high. Water duty for individual landowners served by LIC should not exceed 2.37 acre-ft/acre based on the measured average diversion rate.

Total water use for areas with supplemental supplies must not exceed 2.37 acre-ft/acre.

The maximum diversion rate of 1.4 cfs is too high and should be reduced to 0.62 cfs based on the measured data.

ADWR indicated that portions of the lands served by the claimant were no longer receiving water. These lands should be excluded from the PWR assigned to this claim.

Annual volume is associated with direct flow only.

6417-033-0124

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF APACHE

IN RE THE GENERAL ADJUDICATION OF ALL RIGHT TO USE
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No. 6417

APACHE CO. SUPERIOR COURT
FILED

NO. _____ DOCKETED

MAY 28 1991

COPY

RECOMMENDED FORM
FOR OBJECTIONS TO THE
Hydrographic Survey Report for the
Silver Creek Watershed

AT _____ O'CLOCK 9A. M.
RICHARD D. LUPKE, CLERK
SP. DEPUTY

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=====
This objection is directed to Watershed File Report No. 033-56-____-073
(Please insert no.)
=====

OBJECTOR INFORMATION

Objector's Name: Salt River Project
Objector's Address: Post Office Box 52025
Phoenix, Arizona 85072-2025
Objector's Telephone No: (602) 236-2210

Objector's Watershed File Report No. (If the Objector's claimed water rights are located within the Silver Creek Watershed):
033-____-____-

Or Objector's Statement of Claimant No. (if the Objector's claimed water rights are located outside the Silver Creek Watershed):
39- 82193 - 82206
39- 87343

=====
STATEMENT OF THE OBJECTION
=====

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- 2. I object to the description of APPLICABLE FILINGS AND DECREES
- 3. I object to the description of DWR's ANALYSIS OF FILINGS AND DECREES
- 4. I object to the description of the DIVERSIONS for the claimed water right(s)
- 5. I object to the description of the USES for the claimed water right(s)
- 6. I object to the description of RESERVOIRS used for the claimed water right(s)
- 7. I object to the description of SHARED USES & DIVERSIONS for the claimed water right(s)
- X 8. I object to the PWR (POTENTIAL WATER RIGHT) SUMMARY of the claimed water right(s)
- X 9. I object to the description of the QUANTITIES OF USE for the claimed water right(s)
- 10. I object to the EXPLANATION provided for the claimed water right(s)
- 11. Other Objections (please state volume number, page number and line number for each objection)

My reason for my objection is as follows (please number your objections to correspond to the lines listed above; please attach supporting information and additional pages as necessary).

SEE ATTACHMENT 1

I hereby make this objection on this 20th day of May, 1991.

David C. Ricketts

Signature of Objector

FOR: Salt River Project
(if in a representative capacity)

STATE OF Arizona
COUNTY OF Maricopa

VERIFICATION

(Must be completed by Objector)

I declare under penalty of perjury that I am a claimant in this proceeding; that I have read the contents of the foregoing Objection and know the contents thereof; and that the information contained in the foregoing Objection is true based on my own personal knowledge, except for those portions of the Objection which are indicated as being known to me on information and belief and, as to those portions, I believe them to be true.

David C. Ricketts

Signature of Objector

SUBSCRIBED AND SWORN to before me this 20th day of May, 1991.



Linda Jepperson

Notary Public for the State of Arizona

Residing at Maricopa County

My commission expires _____

CERTIFICATE OF MAILING

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I hereby certify that a copy of the foregoing Objection was served upon the following Claimant(s) by mailing true and correct copies thereof on the 28th day of May, 1991 postage prepaid and addressed as follows:

Name: LAKESIDE IRRIGATION CO.

Address: P.O. BOX 101 OR BOX
LAKESIDE, AZ 85929

David C. Ricketts

(Signature of Objector or person mailing in Objector's behalf)

Objections must be filed with the Clerk of the Superior Court in and for Apache County, Apache County Courthouse, P.O. Box 365, St. Johns, AZ 85936, on or before May 29, 1991. This means that the Objection must be received at the Clerk's office no later than 5:00 p.m. on Wednesday, May 29, 1991.

ATTACHMENT 1

WFR CATEGORY 8 - PWR SUMMARY

The Salt River Project objects to DWR's characterization of DV001 as a "Potential Water Right" (PWR). For purposes of administration, a Watershed File Report (WFR) should be maintained for this diversion. Moreover, the diversion should be assigned a quantity, as well as the priority date or dates associated with downstream PWRs for which the diversion constitutes a source of supply. The WFR for a diversion should also list all PWRs, along with their applicable WFR numbers, served by the diversion. The diversion itself, however, is not a water right, and should not be so designated in the Hydrographic Survey Report.

* * * *

The Salt River Project objects to the basis used by DWR to assign the apparent date of first use to DV001. Previous filings, particularly filings made pursuant to the Water Rights Registration Act (WRRRA), are the evidentiary foundation for the date of priority associated with a water right. DV001 has been matched to a statement of claimant and a WRRRA filing claiming a priority date of < 1905. The apparent date of first use for DV001 should be based on the WRRRA filing, not the statement of claimant, even though in this case the dates are the same.

WFR CATEGORY 9 - QUANTITIES OF USE

The Salt River Project objects to the calculation of the maximum demand rate for diversion DV001. DWR's method of calculating maximum demand rate relies upon principles that are inconsistent with Arizona law and, further, are technically inaccurate. The quantity associated with a diversion should be the capacity of the diversion facility or facilities, unless historic diversions indicate a different amount.

For an additional discussion of the problems with DWR's methods for quantification of Diversion PWRs, see the Salt River Project's Volume 1 objections on this issue, a copy of which is attached and incorporated herein by reference.

**EXCERPT FROM
SALT RIVER PROJECT OBJECTIONS TO
VOLUME 1 OF THE SILVER CREEK HSR**

MAXIMUM DEMAND ESTIMATES

(page numbers refer to Volume 1)

Maximum Demand Rate

pp. A-25 through A-28

The Salt River Project objects to DWR's estimation method and results for maximum demand rates for diversions. Since these rates are based upon estimates of irrigation demand and efficiency, they are inaccurate as a result of the technical errors set forth below. The Salt River Project also objects to DWR's method since it relies upon principles that are inconsistent with Arizona law. A.R.S. § 45-141.(B) provides that "[b]eneficial use shall be the basis, measure, and limit to the use of water." Consistent with this legal standard, diversion rates should be based on actual maximum historic diversions or diversion capacity rather than estimates based upon averages.

Relative Humidity

p. A-4, lines 23-25

The Salt River Project objects to DWR's failure to specify whether it used minimum relative humidity as specified in Food and Agricultural Organization (FAO) Paper 24. The Salt River Project also objects to DWR's use of relative humidity from Winslow when data for the Show Low, Snowflake and Snowflake 15W weather stations can be converted to mean minimum relative humidity through the use of the 6AM and 6PM estimates adjusted with the assistance of "Useful Arizona Climatic Graphs and Data, Series #7."

Wind

p. A-4, lines 26-32

The Salt River Project object's to DWR's use of wind travel data at a height of 2 feet (Snowflake #15) and windspeed data at a height of 10 meters (Winslow) without converting to a 2 meter height as required by FAO Paper 24.¹

Evapotranspiration for Pine Trees

p. A-6, Table A-2; p. A-10, Table A-4

The Salt River Project objects to DWR's reporting of inexplicably high evapotranspiration (consumptive use) values for pine trees as compared to all other crops. DWR has reported Christmas tree or pine tree consumptive use in its various management plans for Active Management Areas at about one-half of the value shown in Table A-2.

¹The wind travel data for Snowflake can be adjusted by use of the formula:

$$WT_2 = WR_{.61}(2/0.61)^2 = 1.27 WT_{.61}$$

The windspeed data for Winslow can be adjusted by use of the formula:

$$W_2 = W_{10}(2/10)^2 = 0.72 W_{10}$$

Pasture Peak Use

p. A-5, lines 30-31; p. A-7, Fig. A-1; p. A-8, Fig. A-2

The Salt River Project objects to DWR's reporting of pasture peak use that exceeds corn peak use. Corn peak use should be higher than pasture since it is taller and has a crop coefficient (kc) that is higher than that of pasture at peak use.

Effective Precipitation

p. A-9, lines 1-31

The Salt River Project objects to DWR's failure to report how it estimates effective precipitation during the non-growing season. The Salt River Project also objects to the use of a 3-inch rather than 4-inch depth of irrigation water application in its estimation of growing season effective precipitation for alfalfa. Furthermore, the Salt River Project objects to DWR's use of a 50 percent probability of precipitation, which results in an inadequate supply in one-half of the years. A 50 percent probability indicates that average effective precipitation is subtracted from crop consumptive use when DWR calculates the irrigation requirement. This means that in years of below-average precipitation, irrigation users would be unable to replace the lack of precipitation with additional irrigation water. The amount of precipitation that is available 80 percent of the time for field crops and 90 percent of the time for orchards and vegetables is appropriate.

Efficiency Estimates

pp. A-10 through A-13; pp. A-31 through A-65

The Salt River Project objects to DWR's estimates of efficiencies for water uses served by irrigation districts and major surface water diverters where average rates of diversion from a few measurements are used to calculate total deliveries and no consideration is given to supplemental supplies obtained by individual users. The Salt River Project also objects to the failure of DWR to include conveyance losses where appropriate in efficiency estimates in the "second procedure," which employs categories of systems.