



NEVADA IRRIGATION DISTRICT

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March 5, 2015

Ms. Barbara Evoy
Deputy Director Division of Water Rights
P.O. Box 2000
Sacramento, CA 95812-2000

Subject: Order WE 2015-0002-DWR, Order 2(C) [Concerning Monthly Reporting by the 5th of Each Month for the Preceding Month]

Dear Ms. Evoy,

The Nevada Irrigation District (District) intends to provide the Division as much information as possible under the limited time frame as requested in order WR 2015-0002-DWR. It is our hope that the information provided will assist the Division in determining accurate water supply versus demand quantities in the Bay-Delta watershed as we move through another year of drought and that such information is used to protect NID and other senior water right holders in accordance with the water right priority system.

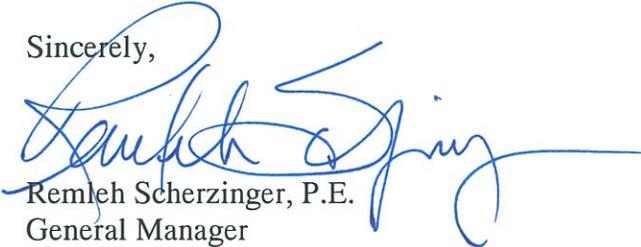
The District has worked diligently during the past four weeks in an effort to provide the most complete and accurate information possible by the date(s) requested in the Order. The information requested for sections 2(A) and 2(B) have been submitted to the extent possible within the limited timeframe provided by the Order and with disclaimers and reservation of rights to protect the District's property and legal rights. However, due to the complexity of the District's system and the comingling of pre-1914 and post-1914 water, compliance with section 2(C), creates a great challenge for the District. Quite simply, it is impossible for the District to compile the data and ensure reporting accuracy within the five day window.

In order to accurately report the amounts diverted for the list of pre-1914 rights listed in Attachment A of the Order, the District needs to utilize the Water Diversion and Use Monitoring Program (Program) that the District developed in 2011 in conjunction with your staff for post-1914 rights. The Program has since expanded to include pre-1914 rights as well. This requires compiling monthly gage data for 42 District sites (which are not telemetered and many of which are remote) and acquiring data from Pacific Gas and Electric Company for 22 of their sites. Then data must be imported into the Program to post-process the gage data to determine use by individual right. It is impossible to undertake this process and accurately report the results to the Division in the first five days of each month, as required by Section 2(C) of the Order.

Barbara Evoy
Division of Water Rights
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Current hydrology indicates that the District's diversions for pre-14 rights in 2015 will closely match the 2014 numbers provided in accordance with the Order. One way to address the impossibility of the District complying within five days is to utilize 2014 hydrology as a proxy for 2015. Another possible solution is to modify section 2(C) of the Order to allow 30 days instead of the current five. While the District could not guarantee the accuracy of the data within 30 days, it could be offered provisionally subject modification after USGS review and the District's typical QA/QC procedures. The District would report the actual amount diverted under each right when the 2015 Statement of Diversion and Use reports are submitted.

Sincerely,



Remleh Scherzinger, P.E.
General Manager