

SECTION D - REQUEST FOR ALTERNATIVE COMPLIANCE

(1b) See response to 2.b., below as to sporadic use of any individual diversion point.

(2b) There are many small wells in the hills and valleys of the 20 K acre ranch, photos of which are enclosed. They are used sporadically and dependent on weather and the need to water cattle or wildlife on the ranch (and to a handful of ranch residences at minimal amounts). Access can be limited under certain conditions and not all have a power source. They are operated as part of a whole to one or more tanks that feed troughs (via gravity) for cattle and wildlife. The size of the cattle herd varies, depending on market and other conditions, and so does the use of the wells overall and individual ones even more so. A series of independent measuring devices that must be read on a weekly basis (even when not in use for extended periods of time) would require a substantial shift in manpower and ranch priorities for little to no additional useful information not already being reported via eWRIMS.

(3b) As reflected above at 2.b., the ever changing reliance on some, none, or all of the diversion points (wells) on the ranch for the modest amount of water used in total among the many wells.

(4) Applicant will diligently measure all extractions using the “bucket and stopwatch” method employed in the past (and noted in part F, below) and report it in a monthly format as applicant has done for decades via eWRIMS. The plan covers the points of diversion and lands reflected in statement numbers S015562 S015563 S015564 S015565 S015566 S015567 S015568 S015569 S015570 S015571 S015572 S015573 S015574 S015575 S015576 S015577.

SECTION F - MEASUREMENT AND MONITORING

(1) Each diversion point (pump) is around 10 gallons per minute. The duration of pumping is controlled by simple clocks at the well, e.g., pump turns on from 2 to 4 o'clock. Extractions are timed and checked to a chart for calculating total volume based on well depth, pipe size, and pump rating. This is the method used to date for all reporting for the ranch wells via eWRIMS.

(2) The measurable variables of the wells do not change, i.e., the pipe size of the outlet from a given well is static. Calculations are made with routine hand-held electronic devices when necessary. The real-world cross-check for accuracy is the capacity of the tanks to which the water is pumped -- one cannot extract more water than a tank will hold without spillage (waste), which is always to be avoided. A large margin of error in measurements or calculations will either cause (1) spills from tanks or (1) damage to livestock who lack sufficient water.

(3) The proposed plan, being the method used for decades of ranch filings via eWRIMS, should be of equal accuracy, with the benefit that the current reported values in eWRIMS will remain comparable to all future reports.