

File No. **50,174** 15. Formation Code: **113** Drainage Basin: **NINNESCAH River** County: **SU** Special Use: Stream:

16. Points of Diversion										
MOD	DEL	ENT	PDIV	Qualifier	S	T	R	ID	'N	'W
MOD		87198		NW NW NE	5	31	1E	1	4815	2518 (Geo-Ctr)
ENT		88120		NW NW NE	5	31	1E		5105	2476 (Batt 1 of 4)
ENT		88121		SW NW NE	5	31	1E		4534	2577 (Batt 1 of 4)
ENT		88122		NE NE NW	5	31	1E		5025	2717 (Batt 1 of 4)
ENT		88123		SW NW NE	5	31	1E		4594	2300 (Batt 1 of 4)
BATTERY ID #2173										

17. Rate and Quantity MOD RATE & QTY				
Authorized		Additional		
Rate gpm	Quantity af	Rate gpm	Quantity af	Overlap PD Files
600	249.6	600	249.6	None

18. Storage: Rate _____ NF Quantity _____ ac/ft Additional Rate _____ NF Additional Quantity _____ ac/ft

19. Limitation: _____ af/yr at _____ gpm (_____ cfs) when combined with file number(s) _____
 Limitation: _____ af/yr at _____ gpm (_____ cfs) when combined with file number(s) _____

20. Meter Required? Yes No To be installed by **12/31/2020 2021** Date Acceptable Meter Installed _____

21. Place of Use							NE¼				NW¼				SW¼				SE¼				Total	Owner	Chg? NO	Overlap Files	
MOD	DEL	ENT	PUSE	S	T	R	ID	NE ¼	NW ¼	SW ¼	SE ¼	NE ¼	NW ¼	SW ¼	SE ¼	NE ¼	NW ¼	SW ¼	SE ¼	NE ¼	NW ¼	SW ¼	SE ¼				
√		69214		5	31	1E	1	5	30	40	10													85	7a.	No	NONE
√		69212		5	31	1E	2									40	40	25	2					107	7c.	No	NONE

Comments:

KANSAS DEPARTMENT OF AGRICULTURE
Division of Water Resources

M E M O R A N D U M

TO: Files

DATE: April 7, 2020

FROM: Doug Schemm

RE: Application File No. 50,174

Mark Lawless has filed the above referenced new application proposing to appropriate 249.6 acre-feet of groundwater at a diversion rate of 600 gallons per minute for irrigation use. There are no other water rights overlapping the point of diversion or place of use. The proposed acreage is owned by Leonard Rausch, the applicant, and David Lawless. The applicant has signed the application form stating he has legal access to the point of diversion. The proposed point of diversion is the geographic center of a battery of four wells located in the Northeast Quarter of Section 5, Township 31 South, Range 1 East, Sumner County, within the Ninnescah River Basin. The requested quantity of water of 249.6 acre-feet applied to the 192-acre place of use is equal to 1.3 acre-feet per acre, which is the maximum allowable for Sumner County.

Based on the driller log information that was submitted to our office, saturated thickness of the aquifer in this local area is limited (approximately 20 feet with only 9.5 feet of sand and gravel). Saturated thickness is typically defined as the distance from the water table to the base of the aquifer for a shallow, unconfined aquifer. The limited saturated thickness has created concerns as to what this source of water supply can physically yield. Both regulation, K.A.R. 5-3-20 specifically (b)(2), and statute K.S.A. 82a-711 specifically (b)(2)(4), support the need for additional information. K.A.R. 5-3-20 (b), states, in part, the maximum reasonable annual quantity of water that may be approved for use on irrigated land shall be limited to the following: (2) the quantity of water reasonably physically available from the source of water supply based on the physical characteristics of the source of water supply and the proposed diversion works. The saturated thickness at the proposed point of diversion is a physical characteristic of this aquifer, and is likely to be a significant factor in determining what quantity of water the Division of Water Resources can approve for this application. Therefore, the applicant was sent a letter on June 18, 2019, requesting additional information such as a hydrologic analysis of the aquifer (e.g. aquifer pump test) to show what quantity of water is physically available from the source of supply.

Test results were received on February 3, 2020 in a report prepared by Ground Water Associates, Inc. The report states that the aquifer will not support 800 gallons per minute and the applicant has stated he will accept a pumping rate reduction to 600 gallons per minute. The test well was pumped at 163.5 gallons per minute for 1440 minutes (24 hours). Projected drawdown with each of wells in the battery pumping at 150 gallons per minute (600 gpm total), for 70 days (185.6 acre-feet), shows roughly 9.3 feet of drawdown 660 feet away, and 8.3 feet of drawdown one-half mile away. However, the report notes that the nearby Ninnescah River will contribute a significant quantity of water to this pumping well, and the projected drawdowns are likely too high. The nearest non-domestic well is over 5,000 feet away, and the nearest domestic well is over 800 feet away. With the location of the pumping well and nearby domestic wells adjacent to the river, and the large recharge from the river, it does not appear that approval of this application will impair any senior water right. The applicant was verbally informed by the consultant, that the nearby domestics would not be impaired based on the test results.

In 2004 the United States Geological Survey (USGS) completed a hydrologic model of a portion of the Arkansas River and associated drainage basins (Ninnescah River), generally bounded by Ranges 2 West to 3 East and Townships 26 South to 34 South (near state line). The USGS model indicated that the aquifer in this area receives more recharge from precipitation than DWR has historically used in safe yield calculations. The data and analyses are detailed in the USGS Scientific Investigations Report 2004-5204 entitled "Characterization and Simulation of Flow in the Lower Arkansas River Alluvial Aquifer, South-Central Kansas". In order to evaluate the potential impact of this study on our safe yield calculations, DWR suspended processing applications for new appropriations of water in the model area.

DWR staff completed an evaluation of the USGS model and determined that the precipitation recharge value of 5.4 inches per year that is used in the USGS model is reasonable and appropriate. In order to reserve water in the alluvial aquifers that can contribute to base flow to area streams and for domestic use, it was determined that 75 percent of the 5.4 inches of precipitation recharge shall be available for appropriation. This is consistent with safe yield appropriation in many other basins across the state, and is the current percent available in for all applications in the Ninnescah River drainage basin. Therefore, for all pending applications within the model area, safe yield will be evaluated using the standard methodology in K.A.R. 5-3-11, which is based on the extent of the unconfined aquifer (area of consideration), a Potential Annual Recharge value of 5.4 inches, and a percent of recharge available for appropriation of 75%. Current annual recharge across the model area is approximately 3 inches.

Per the requirements in K.A.R. 5-3-11, safe yield is determined by the extent of the unconfined aquifer within a two-mile circle radius of the point of diversion, which establishes the area of consideration. For this application, the area of consideration (alluvial aquifer) provided an area of consideration of 4,351 acres, with a potential annual recharge of 5.4 inches, and 75% of recharge available for appropriation, safe yield was determined to be 1,468.35 acre-feet. Existing water rights have appropriated 466.5 acre-feet, providing a difference of 1,001.85 acre-feet of water available for appropriation. The application requesting 249.6 acre-feet complies with safe yield criteria.

The applicant identified multiple nearby domestic wells within one-half mile of the proposed point of diversion. Nearby well owner letters were sent out on May 23, 2019. There was a telephone call from one nearby well owner with general questions and concerns about possible impact to his domestic well. We discussed his senior water right, and that if he believed he was being impaired, DWR staff could do an investigation. No written responses of any kind were received.

As noted above, according to the WRIS database, the nearest non-domestic point of diversion is located over 5,000 feet away, while the nearest domestic well is located over 800 feet away. The proposed point of diversion meets minimum well spacing to all existing wells. Per the requirements in K.A.R. 5-4-4 for all other aquifers, the minimum well spacing should be one-quarter mile to all other non-domestic wells and 660 feet to domestic wells.

In accordance with K.S.A. 82a-706c, the Chief Engineer retains full authority to require any water user to install meters, gages, or other measuring devices, which devices he or she or his or her agents may read at any time. Water flowmeter requirements are further described in K.A.R. 5-1-4 through K.A.R. 5-1-12. If any chemical or foreign substance is injected into the water pumped under this permit, a check valve will also need to be installed. A water level measurement tube is required because the rate of diversion will exceed 100 gpm.

In a March 24, 2020 e-mail, Jeff Lanterman, Water Commissioner, Stafford Field Office, stated that the referenced application should be approved.

Based on the above discussion, that the area is open to new appropriations for groundwater, the proposed appropriation of water complies with safe yield and well spacing criteria, the applicant provided additional information regarding the aquifer, and there is no evidence that senior rights will be impaired, it is recommended that the referenced application be approved.

Doug Schemm
Environmental Scientist
Topeka Field Office

Schemm, Doug [KDA]

From: Schemm, Doug [KDA]
Sent: Tuesday, April 7, 2020 10:56 AM
To: Schemm, Doug [KDA]
Subject: FW: Mark Lawless 50,174

From: Lanterman, Jeff [KDA]
Sent: Tuesday, March 24, 2020 3:33 PM
To: Schemm, Doug [KDA] <Doug.Schemm@ks.gov>
Cc: Conant, Cameron [KDA] <Cameron.Conant@ks.gov>
Subject: FW: Mark Lawless 50,174

Doug.

Honestly I hope he's right regarding the water coming from the Ninnescah.

Approve it with the rate reduction.

Jeff

From: Conant, Cameron [KDA] <Cameron.Conant@ks.gov>
Sent: Friday, March 13, 2020 9:45 AM
To: Lanterman, Jeff [KDA] <Jeff.Lanterman@ks.gov>
Subject: FW: Mark Lawless 50,174

Jeff, Mark called on this one. He is wanting to plant corn in early April and hoped this could be ready to roll be then so they could get the work completed w/out trashing a lot of planted corn. I told him I would be providing review and recommendation to you the week of the 23-27. Then I got to looking at it some more and it and figured I'd just send you the recommendation and if you have time next week while I'm gone you can move it along.

Poor well log with limited saturated thickness (attached). We requested a study and Mark worked with Brad Vincent. Brad's study noted the aquifer won't support 800gpm and also noted his drawdown estimates are too high b/c the river would be supplying a lot of this water which he didn't account for. The study is a 25 page report in docuware. Mark has agreed to reduce the rate to 600gpm based on the analysis in the study.

This is the area where we didn't have a ton of hydrographs but we asked Pat to incorporate some additional wells down there for annual monitoring. I've attached the 2 closest hydrographs, the closer one is east of the river, the further one is west of the river.

http://hercules.kgs.ku.edu/geohydro/wizard/wizardwelldetail.cfm?usgs_id=372459097203401 (2.5 miles north 50' deep)

http://hercules.kgs.ku.edu/geohydro/wizard/wizardwelldetail.cfm?usgs_id=372522097170701 (3.7 miles NW 37' deep)

Based on the reduced rate, the fact that spacing is met, and SY being available, I think we can recommend approval of this application. Please pass on to Doug if you agree.

+++++I'm going to send an email to Pat and you to discuss our annual well dispersion around this area. I know we added some several years ago, but it would be worthwhile to revisit it and make sure we have adequate monitoring as applications are still being approved here.+++++

Cameron

From: Schemm, Doug [KDA] <Doug.Schemm@ks.gov>

Sent: Thursday, February 27, 2020 4:21 PM

To: Lanterman, Jeff [KDA] <Jeff.Lanterman@ks.gov>; Conant, Cameron [KDA] <Cameron.Conant@ks.gov>

Subject: Mark Lawless 50,174

Hello Stafford,

So Mark got his testing done by Brad. It appears that the location of well near the river messed up the results somewhat, but Brad did indicate a large portion of the water from this well would be recharge from the river, and I would agree with that.

The application complies with safe yield and well spacing criteria. Mark has agreed to reduce rate to 600 gpm.

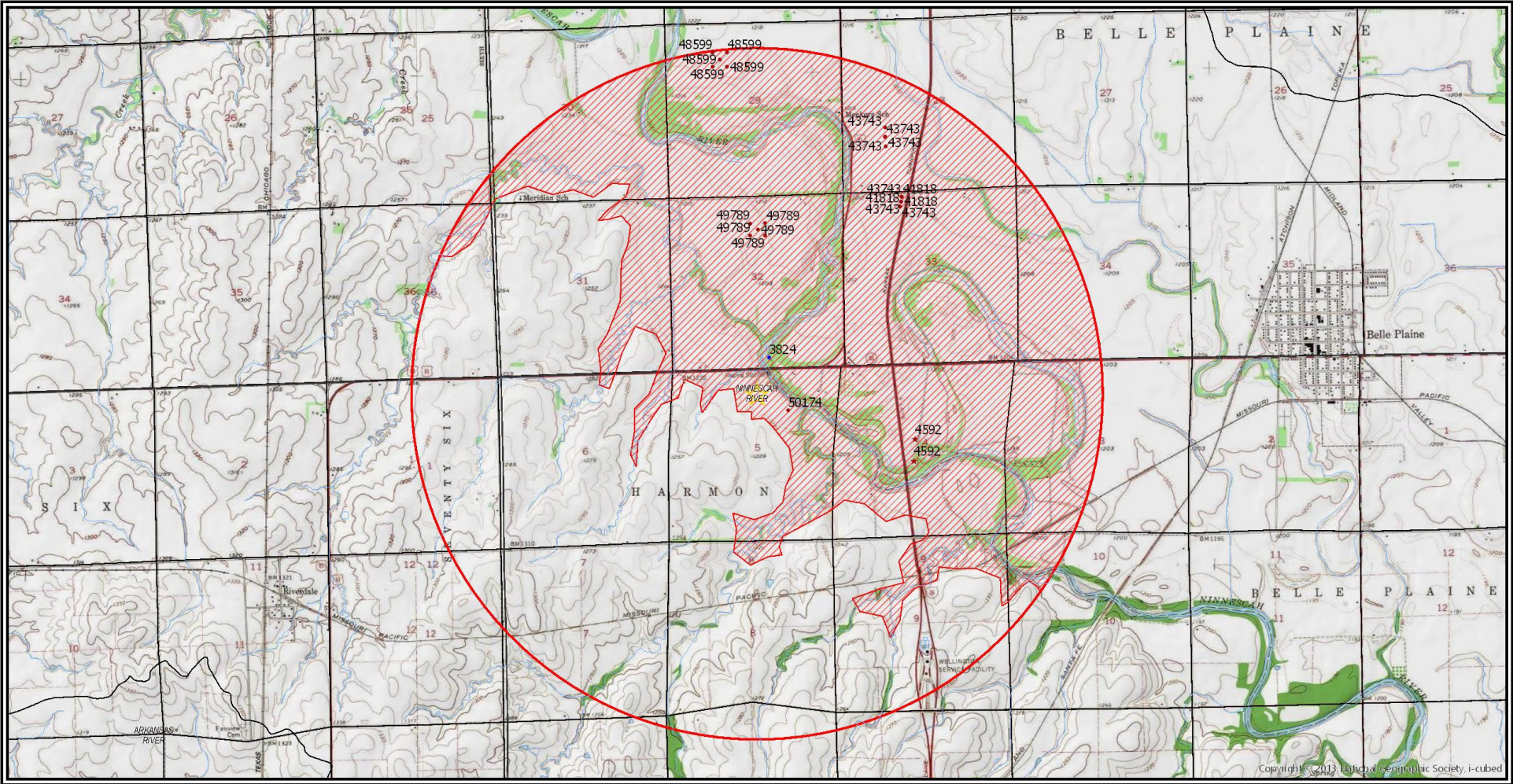
I think with the recharge from the river, reduced pumping rate, and meeting well spacing, there shouldn't be a problem.

Brad told Mark verbally after the testing that no domestic well would be affected.

Please review,

Doug

Safe Yield Report Sheet
Water Right- Proposed Point of Diversion
Point of Diversion in 05-31S-01E
Footages from SE corner- 4,472 feet North 2,260 feet West



Analysis Results

The selected PD is in an area OPEN to new appropriations.

The safe yield based on the variables listed below is 1,468.35 AF.

Total prior appropriations in the circle is 716.50 AF. - 250 AF = 466.5 AF

Total quantity of water available for appropriation is ~~751.85~~ AF.

1,001.85 AF

Application File No. 50,174 - Requesting 249.6 AF
Meets Safe Yield
dws/dwr 4/7/20

Safe Yield Variables

The area used for the analysis is set at 4,351 acres.

The potential annual recharge at the circle center is estimated to be 5.4 inches.

The percent of recharge available for appropriation is 75%.

Authorized Quantity values are as of 13-MAY-2019 and are based on Appropriated and Vested ground water right and possible stream nodes for GMD #2. Domestic, Term and Temporary water rights have been excluded.

There are 5 water rights and 18 points of diversion within the circle.

File Number	Use	ST	SR	Q4	Q3	Q2	Q1	FeetN	FeetW	Sec	Twp	Rng	ID	Qind	Auth Quant	Add Quant	Tot Acres	Net Acres
A 41818 00	IRR	NK	G		NW	NE	NW	5042	3482	33	30	01E	2	WR	64.00	64.00	73.00	73.00
Same	IRR	NK	G		NW	NE	NW	4899	3519	33	30	01E	3	WR				
Same	IRR	NK	G		NW	NE	NW	4755	3555	33	30	01E	4	WR				
A 43743 00	IRR	NK	G		SE	NW	SW	1537	3982	28	30	01E	1	WR	55.00	55.00	73.80	73.80
Same	IRR	NK	G		SE	NW	SW	1538	3983	28	30	01E	2	WR				
Same	IRR	NK	G		NE	SW	SW	1247	3977	28	30	01E	3	WR				
Same	IRR	NK	G		SE	NW	SW	1826	3986	28	30	01E	4	WR				
A 48599 00	IRR	KE	G		SW	NE	NW	4109	3713	29	30	01E	1	WR	146.00	146.00	112.00	112.00
Same	IRR	KE	G		SW	NE	NW	4321	3925	29	30	01E	2	WR				
Same	IRR	KE	G		SW	NE	NW	4321	3501	29	30	01E	3	WR				
Same	IRR	KE	G		NW	SE	NW	3897	3925	29	30	01E	4	WR				
Same	IRR	KE	G		NW	SE	NW	3897	3501	29	30	01E	5	WR				
A 49789 00	IRR	KE	G		SW	NW	NE	4000	2389	32	30	01E	2	WR	201.50	201.50	157.00	157.00
Same	IRR	KE	G		SE	NE	NW	4000	2839	32	30	01E	3	WR				
Same	IRR	KE	G		SE	NE	NW	4374	2839	32	30	01E	4	WR				
Same	IRR	KE	G		SW	NW	NE	4374	2389	32	30	01E	5	WR				
Same	IRR	KE	G		SW	NW	NE	4187	2614	32	30	01E	6	WR				
A 50174 00	IRR	AY	G				NE	3960	1325	05	31	01E	1	WR	250.00	-250.00	192.00	192.00

1320 Research Park Drive
Manhattan, KS 66502
785-564-6700
www. agriculture.ks.gov



900 SW Jackson, Room 456
Topeka, KS 66612
785-296-3556

Mike Beam, Secretary

Laura Kelly, Governor

MARK E & KARLA LAWLESS
PO BOX 515
BELLE PLAINE KS 67013

RE: Appropriation of Water, File No. 50,174

Dear Mr. and Mrs. Lawless:

Enclosed is a permit authorizing you to proceed with construction of the proposed diversion works and to appropriate water for beneficial use as set forth in the permit. Your attention is directed to the enclosures and to the terms, conditions, limitations, and requirements specified in this permit.

Notice must be filed on the enclosed form once the diversion works have been completed. Failure to complete the diversion works within the time allowed, or within any authorized extension of time thereof, will result in dismissal of this permit. If you need an extension of time, you must request it before the deadline for completion set forth in the permit. Any request for an extension of time must be accompanied by the statutorily required fee, which is currently \$100.00.

An acceptable water flowmeter must be installed on the diversion works authorized by this permit prior to using water. An annual water use report must be filed with the Chief Engineer by March 1, following the end of each calendar year. If a complete annual water use report is not received by the deadline, then a fine may be assessed and all water use under such permit or right may be suspended. Reports submitted in paper form will be assessed a \$20 per file number paper filing fee. In order to avoid this filing fee, you may submit your report online at www.kswaterusereport.org.

The approval of your application constitutes a permit to appropriate water. It does not give authority to construct any dam or other stream obstruction regulated by K.S.A. 82a-301 through 305a. It does not give authority to access any right-of-way or authorize trespassing upon or injury to public or private property. It may also be necessary for you to comply with other local, state or federal requirements.

Enclosed is an informational sheet that sets forth the procedure to obtain a Certificate of Appropriation which will establish the extent of your perfected water right. Additional information and applicable forms may be found on our website at agriculture.ks.gov/divisions-programs/dwr. If you have any questions or need assistance with any of these requirements, please contact our office at 785-564-6640 or your local Stafford Field Office at 620-234-5311. If you call, please reference the file number so we can help you more efficiently.

Sincerely,

Kristen A. Baum
New Application Unit Supervisor
Division of Water Resources

KAB:dws
Enclosure(s)

pc: Stafford Field Office
Leonard Rausch

THE STATE OF KANSAS



KANSAS DEPARTMENT OF AGRICULTURE
Mike Beam, Secretary of Agriculture

DIVISION OF WATER RESOURCES
Christopher W. Beightel, Acting Chief Engineer

APPROVAL OF APPLICATION and PERMIT TO PROCEED

(This is not a Certificate of Appropriation)

This is to certify that I have examined Application, **File No. 50,174** of the applicant

MARK E LAWLESS
PO BOX 515
BELLE PLAINE KS 67013

for a permit to appropriate water for beneficial use, together with the maps, plans and other submitted data, and that the application is hereby approved and the applicant is hereby authorized, subject to vested rights and prior appropriations, to proceed with the construction of the proposed diversion works (except those dams and stream obstructions regulated by K.S.A. 82a-301 through 305a, as amended), and to proceed with all steps necessary for the application of the water to the approved and proposed beneficial use and otherwise perfect the proposed appropriation subject to the following terms, conditions and limitations:

1. That the priority date assigned to such application is **November 30, 2018**.
2. That the water sought to be appropriated shall be used for irrigation use on land described in the application, as follows:

Sec.	Twp.	Range	NE $\frac{1}{4}$				NW $\frac{1}{4}$				SW $\frac{1}{4}$				SE $\frac{1}{4}$				TOTAL			
			NE $\frac{1}{4}$	NW $\frac{1}{4}$	SW $\frac{1}{4}$	SE $\frac{1}{4}$	NE $\frac{1}{4}$	NW $\frac{1}{4}$	SW $\frac{1}{4}$	SE $\frac{1}{4}$	NE $\frac{1}{4}$	NW $\frac{1}{4}$	SW $\frac{1}{4}$	SE $\frac{1}{4}$	NE $\frac{1}{4}$	NW $\frac{1}{4}$	SW $\frac{1}{4}$	SE $\frac{1}{4}$				
5	31S	1E	5	30	40	10												40	40	25	2	192

3. That the authorized source from which the appropriation shall be made is groundwater, to be withdrawn by means of a battery of four (4) wells with a geographic center located in the Northwest Quarter of the Northwest Quarter of the Northeast Quarter (NW $\frac{1}{4}$ NW $\frac{1}{4}$ NE $\frac{1}{4}$) of Section 5, more particularly described as being near a point 4,815 feet North and 2,518 feet West of the Southeast corner of said section, in Township 31 South, Range 1 East, Sumner County, Kansas, located substantially as shown on the topographic map accompanying the application.

4. That the appropriation sought shall be limited to a maximum diversion rate not in excess of **600 gallons per minute** (1.34 c.f.s.) and to a quantity not to exceed **249.6 acre-feet** of water for any calendar year.

5. That installation of works for diversion of water shall be completed on or before **December 31, 2021**, or within any authorized extension thereof. The applicant shall notify the Chief Engineer and pay the statutorily required field inspection fee, which is currently \$400.00, when construction of the works has been completed. Failure to timely submit the notice and the fee will result in revocation of the permit. Any request for an extension of time shall be accompanied by the required statutory fee, which is currently \$100.00.

6. That the proposed appropriation shall be perfected by the actual application of water to the proposed beneficial use on or before **December 31, 2025**, or any authorized extension thereof. Any request for an extension of time shall be submitted prior to the expiration of the deadline and shall be accompanied by the required statutory fee, which is currently \$100.00.
7. That the applicant shall not be deemed to have acquired a water appropriation for a quantity in excess of the amount approved herein nor in excess of the amount found by the Chief Engineer to have been actually used for the approved purpose during one calendar year subsequent to approval of the application and within the time specified for perfection or any authorized extension thereof.
8. That the use of water herein authorized shall not be made so as to impair any use under existing water rights nor prejudicially and unreasonably affect the public interest.
9. That the right of the appropriator shall relate to a specific quantity of water and such right must allow for a reasonable raising or lowering of the static water level and for the reasonable increase or decrease of the streamflow at the appropriator's point of diversion.
10. That this permit does not constitute authority under K.S.A. 82a-301 through 305a to construct any dam or other obstruction; nor does it grant any right-of-way, or authorize entry upon or injury to, public or private property.
11. That all diversion works constructed under the authority of this permit into which any type of chemical or other foreign substance will be injected into the water pumped from the diversion works shall be equipped with an in-line, automatic quick-closing, check valve capable of preventing pollution of the source of the water supply. The type of valve installed shall meet specifications adopted by the Chief Engineer and shall be maintained in an operating condition satisfactory to the Chief Engineer.
12. That an acceptable water flow meter shall be installed and maintained on the diversion works authorized by this permit in accordance Kansas Administrative Regulations 5-1-4 through 5-1-12 adopted by the Chief Engineer. This water flow meter shall be used to provide an accurate quantity of water diverted as required for the annual water use report (including the meter reading at the beginning and end of the report year).
13. That the applicant shall maintain accurate and complete records from which the quantity of water diverted during each calendar year may be readily determined and the applicant shall file an annual water use report with the Chief Engineer by March 1 following the end of each calendar year. Failure to file the annual water use report by the due date shall cause the applicant to be subject to a civil penalty.
14. That all wells with a diversion rate of 100 gallons per minute or more drilled under the authority of this permit shall have a tube or other device installed in a manner acceptable to, and in accordance with specifications adopted by, the Chief Engineer. This tube or device shall be suitable for making water level measurements and shall be maintained in a condition satisfactory to the Chief Engineer.
15. That no water user shall engage in nor allow the waste of any water diverted under the authority of this permit.
16. That failure without cause to comply with provisions of the permit and its terms, conditions and limitations will result in the forfeiture of the priority date, revocation of the permit and dismissal of the application.

RIGHT TO A HEARING AND TO ADMINISTRATIVE REVIEW

If you are aggrieved by this Order, then pursuant to K.S.A. 82a-1901, you may:

- 1) request an evidentiary hearing before the Chief Engineer, or
- 2) request administrative review by the Secretary of Agriculture.

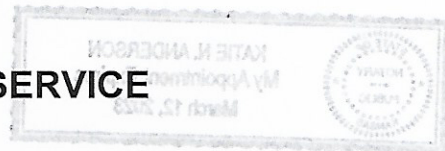
Failure to request an evidentiary hearing before the Chief Engineer does not preclude your right to administrative review by the Secretary.

To obtain an evidentiary hearing before the Chief Engineer, a written request for hearing must be filed within 15 days after service of this Order as provided in K.S.A. 77-531 (i.e., **within a total of 18 days after this Order was mailed to you**), with: Kansas Department of Agriculture, Attn: Legal Section, 1320 Research Park Drive, Manhattan, Kansas 66502, FAX (785) 564-6777.

If you do not file a request for an evidentiary hearing before the Chief Engineer, you may petition for administrative review of the Order by the Secretary of Agriculture. A petition for review shall be in writing and state the basis for requesting administrative review. The request for hearing may be denied if the request fails to clearly establish factual or legal issues for review. See K.S.A. 77-527. The petition must be filed within 30 days after service of this Order as provided in K.S.A. 77-531 (i.e., **within a total of 33 days after this Order was mailed to you**), and be filed with: Secretary of Agriculture, Attn: Legal Division, Kansas Department of Agriculture, 1320 Research Park Drive, Manhattan, Kansas 66502, FAX (785) 564-6777.

If neither a request for an evidentiary hearing nor a petition for administrative review is filed as set forth above, then this Order shall be effective and become a final agency action as defined in K.S.A. 77-607(b). Failure to timely request either an evidentiary hearing or administrative review may preclude further judicial review under the Kansas Judicial Review Act.

CERTIFICATE OF SERVICE



On this 6th day of May, 2020, I hereby certify that the foregoing Approval of Application, File No. 50,174, dated April 29, 2020 was mailed postage prepaid, first class, US mail to the following:

MARK E & KARLA LAWLESS
PO BOX 515
BELLE PLAINE KS 67013

With photocopies to:

LEONARD RAUSCH
894 E 80TH AVE N
BELLE PLAINE KS 67013

Stafford Field Office

Kate Anderson

Division of Water Resources