

9-13-07 ~~Justin~~ Jasper to clean up & send out for review
Conference call Tuesday afternoon to go over comments

INTEGRATED MANAGEMENT PLAN
Jointly Developed by the
DEPARTMENT OF NATURAL RESOURCES
and the
UPPER REPUBLICAN NATURAL RESOURCES DISTRICT

AUTHORITY

This Integrated Management Plan (IMP) was prepared by the Board of Directors of the Upper Republican Natural Resources District (URNRD) and the Nebraska Department of Natural Resources (NDNR) in accordance with the Nebraska Ground Water Management and Protection Act, Neb. Rev. Stat. §§ 46-701 to 46-753 (Reissue 2004).

BACKGROUND

Commencing in 1978, the URNRD has adopted and enforced rules and regulations for the purpose of managing the ground water resources within the URNRD. On April 11, 2003, effective May 8, 2003, the URNRD, pursuant to applicable statutory rulemaking procedures and Neb. Rev. Stat. § 46-656.25 (Reissue 1998), adopted the *State of Nebraska Upper Republican Natural Resources District Amendments to Rules and Regulations for Ground Water Control – Order No. 26* and the *Upper Republican Natural Resources District Technical Manual of Policies and Procedures TM-26* (the “URNRD Rules” or “the Rules”). In the regular meeting, on July 6, 2004, the URNRD voted to extend Order No. 26 until September 1, 2005. Rule 9A of the Rules provides for a basic allocation of ground water to certified irrigated acres within the URNRD of 72.5 acre-inches for the five (5) year period between January 1, 2003 and December 31, 2007, an annualized allocation of 14.5 acre-inches. Since their adoption, the Rules have prohibited additional allocations for ground water use and additional well permits, except under limited circumstances. In addition, among other things, the Rules continued and recodified the URNRD’s practice of allowing ground water users to carry forward the unused portion of their allocation, together with any remaining unused portions of allocations from previous years, into succeeding allocation periods and permitted the URNRD to approve pooling contracts, both in accordance with the URNRD Rules.

In 1943 the States of Colorado, Kansas and Nebraska entered into the Republican River Compact (the “Compact”) with the approval of the United States Congress. The Compact provides for the allocation of the “virgin water supply” of the Republican River Basin (the “Basin”) between the three States. Following several years of dispute about Nebraska’s consumptive use of water within the Basin, Kansas filed an original action in the United States Supreme Court against the States of Nebraska and Colorado in 1998, seeking, among other things, to include ground water in the calculation of the virgin water supply and consumptive use. The United States Supreme Court appointed a Special Master who recommended that the depletions to stream flow from the use of ground water must be included in the virgin water supply and be part of the calculation of each State’s beneficial consumptive use. The United States Supreme Court adopted the Special Master’s recommendation. Subsequent to this determination, the States entered into a Settlement Agreement resolving the remaining issues in

the case. The Settlement Agreement was approved by the United States Supreme Court on May 19, 2003.

Both prior and subsequent to the approval of the Settlement Agreement, the NDNR conducted and participated in several meetings with the URNRD, including several public meetings. During the course of those meetings the NDNR explained, in order for the State of Nebraska to achieve and maintain compliance with the terms of the Settlement Agreement, it would be necessary to (1) continue the moratorium on new surface water appropriations and new ground water wells, (2) reduce all ground water pumpage from historic levels across the entire Basin and (3) further reduce ground water pumping needed to comply with the Compact in water short years, to be accomplished to the extent possible through the use of incentive programs to reduce consumptive use of water. Ground water within the Basin is regulated by four Natural Resource Districts: the URNRD, the Middle Republican Natural Resources District (the "Middle"), the Lower Republican Natural Resources District (the "Lower") and the Tri-Basin Natural Resources District (the "Tri-Basin") (collectively hereinafter the "Districts"). Similar discussions were held between the NDNR and each of the Districts regarding the need (1) to accurately measure actual ground water pumpage and surface water diversions throughout the Basin and within each District, (2) for the Tri-Basin to maintain, at sufficient levels to offset depletions to the Republican River caused by ground water pumping within the Republican River Compact area within the Tri-Basin, the Compact Imported Water Supply that Nebraska receives because of discharges from the "ground water mound"; and, 3) for each of the Districts other than the Tri-Basin to reduce its ground water pumping from their 1998-2002 baseline pumping figures, as defined below.

Since 1978, with adoption of its Order #1, the URNRD has required the metering, data collection and reporting of ground water use, resulting in actual pumpage and use data, and has imposed allocations and regulation on ground water users within the URNRD, while the use of wells in the Middle and Lower were neither reported nor regulated during the same period. In order to estimate pumping in the Middle and Lower, other methods based on hours of operation using electrical power information and individual pumping rates were used. The NDNR has determined the following pumping volumes for the period 1998-2002: 531,763 acre-feet for the URNRD, 309,479 acre-feet for the Middle and 242,289 acre-feet for the Lower. These pumping volumes are used throughout this IMP and are referenced as the "1998-2002 baseline pumping figures." NDNR, through the use of the Republican River Compact Administration Ground Water Model, has also determined each District's depletions to stream flow for the period 1998-2002 ("1998-2002 baseline depletion figures"): 74,161 acre-feet for the URNRD, 52,168 acre-feet for the Middle and 43,954 acre-feet for the Lower. Those depletion numbers have resulted in the following depletion proportions: 44% for the URNRD, 30% for the Middle and 26% for the Lower. These depletion proportions are used throughout this IMP and are referenced as the "1998-2002 baseline depletion proportions." The percentage of allowable ground water depletions for each Republican River District were based on the proportion of the average ground water depletions caused by ground water pumping within each District that occurred during the base-line period from 1998-2002 as determined by model runs of the Republican River Compact Administration Ground Water Model with ground water pumping in each District alternated turned off and then on. The pumping values used to make these determinations will be evaluated within the next five years to determine their accuracy as compared with metered pumping values. If the baseline pumping values are found to be in error, the pumping values for

the 1998-2002 period will be revised and the percentage of depletions for this period will be readjusted based on the new pumping values.

The URNRD and the NDNR adopted an integrated management plan on May 3rd, 2005, that contained groundwater rules and regulations for the 2005-2007 period. The integrated management plan provided for a groundwater allocation of 13.5 inches per certified acre, continued the pooling of allocations, and the carry forward of unused allocations, among other things. The goal of the 2005 integrated management plan was to reduce water use by 5% from the 1998-2002 baseline. Since that time, efforts have been taken to implement or conduct incentive programs, studies, and research to further our understanding and ability to comply with the Republican River Compact and settlement. The URNRD and the NDNR wish to adopt and implement a revised IMP for the regulation of water resources within the District as required by the laws of the State of Nebraska. The NRD and the NDNR agree that the IMP for the District shall keep the District's depletions including credits for streamflow augmentation to an amount within 44% of the State's allowable ground water depletions. Based upon its calculations, the NDNR believes that pumping equivalent to 80% of the 98-02 baseline pumping during periods of average precipitation throughout the basin would be sufficient without additional streamflow augmentation to keep the District's net depletions within the URNRD's 44% share of the State's allowable ground water depletions through the year 2020. The URNRD will meet its responsibility under Neb. Rev. Stat. §46-715, including meeting the obligations under the Settlement Agreement, by adopting revised rules to implement the integrated management plan. It is expected that the other Districts will be treated equivalently and the use of water by each District will be within the allocations distributed to each District based on its proportional share of the 1998-2002 baseline pumping and 1998-2002 depletion figures.

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DEFINITIONS

1998-2002 Baseline Depletion Figures – The depletions to stream flow in the Republican River Basin caused by surface water and ground water use in the years 1998-2002 inclusive.

Unbold

Allowable Streamflow Depletions - the maximum amount of streamflow depletion in the Republican River Basin that can be allowed without violating the Compact. *will be determined after-the-fact*

Allowable Ground Water Depletions - the maximum level of depletions to stream flow that may occur as a result of ground water pumping of wells within the Republican River Compact area without causing a violation of the Compact.

under the RRCA

The allowable ground water depletion is expressed as a percentage of Nebraska's allocation for a given year. The allowable ground water depletions are based on the percentage of the total depletions to streamflow caused by ground water pumping that occurred during the baseline years 1998-2002. The allowable ground water depletions are the amount of ground water depletions that can be maintained during years of average precipitation throughout the basin. If in any given compliance period, surface water users did not make use of all their allowable

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depletions, the difference may be added to the allowable depletion of ground water users during the same compliance period. In years that Nebraska's allocation is less than it would have otherwise been due to reduced precipitation or surface water runoff, the allowable groundwater depletions shall be increased by an amount equal to the unused allowable surface water depletions, if any.

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Allowable Ground Water Depletion for the URNRD - the depletions to stream flow from ground water pumping in the URNRD that are no greater than 44% of the total allowable ground water depletions.

Allowable Surface Water Depletion - the maximum level of depletions to stream flow that may occur as a result of surface water diversions within the Republican River Compact area without causing a violation of the Compact. The allowable surface water depletion is expressed as a percentage of Nebraska's allocation for a given year.

*under
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The percentage is based on the amount of depletion due to surface water diversions and reservoir evaporation that would have occurred during the years 1998-2002 had the amount of surface water depletions been capped at an amount that could be maintained during years of average precipitation throughout the basin such that the pumping depth on surface water irrigated acres if shared equally across the basin would result in a surface water irrigation pumping depth equivalent to the weighted average groundwater irrigation depth in the basin. The allowable surface water depletion is a maximum limit, not a guarantee of supply. ~~Whereas, a significant amount of surface water supply originates as overland runoff and precipitation dependent baseflow, should precipitation levels result in reduced stream flow from runoff or baseflow, it is not expected that the District shall reductions in groundwater pumpage by ground water uses in existence at the time the URNRD was declared to be fully appropriated shall be required in order to increase surface water supplies for surface water appropriators. to offset these reductions in surface water supply.~~

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Compliance Standard - the standard, expressed as an allowable depletion to streamflow, that will be used in part to determine whether the NDNR and the District are in compliance with the integrated management plan. Compliance will be measured using the Republican River Compact Administration Ground Water Model in accordance with the procedures described in Appendix A.

GOALS AND OBJECTIVES

Pursuant to Neb. Rev. Stat. § 46-715 (Reissue 2004), the goals and objectives of this IMP must have as a purpose "sustaining a balance between water uses and water supplies so that the economic viability, social and environmental health, safety, and welfare of the river basin ... can

be achieved and maintained for both the near term and the long term.” The following goals and objectives are also adopted by the URNRD and the NDNR to meet the additional requirements of Neb. Rev. Stat. §46-715.

Goals:

1. In cooperation with the State of Nebraska and the other Districts, maintain compliance with the Compact as adopted in 1943 and as implemented in accordance with the Settlement Agreement approved by the United States Supreme Court on May 19, 2003;
2. Ensure that ~~ground water and surface~~ water users within the ^{Basin} URNRD assume their share, but only their share of the responsibility to maintain compliance with the Compact; and
3. Provide that the URNRD’s share of that responsibility be distributed within the URNRD in an equitable manner and to minimize, to the extent possible, adverse economic, social and environmental consequences.
4. Protect ground water users whose water wells are dependent on recharge from the river or stream and the surface water appropriators on such river or stream from streamflow depletions caused by surface water uses and ground water uses begun after the date the river basin was designated as fully appropriated.
5. Limit basin-wide groundwater depletions to a level that would maintain sufficient surface water that could be made available through contracts between the State and or the Districts and the surface water appropriators to meet Compact requirements when stream flow depletions must be decreased in a timely manner to maintain Compact compliance.

Objectives:

1. With limited exceptions, prevent the initiation of new or expanded uses of water that increase Nebraska’s computed beneficial consumptive use of water within the URNRD, as required for Compact compliance and in full compliance with Nebraska law;
2. Ensure administration of surface water appropriations in the Basin is in accordance with the Compact and in full compliance with Nebraska law;
3. Reduce existing ground water use within the URNRD as necessary from the 1998-2002 baseline pumping figures and from the 1998-2002 baseline depletion figures, as computed through use of the Republican River Compact Administration Ground Water Model, to maintain the District’s depletions within 44% of Nebraska’s allowable ground water depletions;
4. After taking into account any reduction in beneficial consumptive use achieved through basin-wide incentive programs and streamflow augmentation projects, make such additional reductions in ground water use in water short years as are necessary to

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achieve a reduction in beneficial consumptive use in the URNRD in an amount proportionate to the total reduction in consumptive use required by the Settlement Agreement in Nebraska above Guide Rock in such years;

5. Cause the reductions in water use required for Compact compliance to be achieved through a combination of regulatory, incentive, and augmentation programs designed to reduce beneficial consumptive use, relying on incentive programs available to as many of the URNRD water users as possible; and
6. Cooperate with the NDNR to investigate and explore methods to manage the impact of vegetative growth on stream flow.
7. Develop a program to provide offsets for new consumptive uses of water so that economic development in the district may continue without producing an overall increase in ground water depletions as a result of the new uses.

MAP - see map 1.

The area subject to this IMP is the geographic area within the boundaries of the URNRD.

FORECAST OF MAXIMUM AMOUNT OF WATER THAT MAY BE AVAILABLE FROM STREAMFLOW DEPLETIONS

Each year in compliance with Neb. Rev. Stat. § 46-715(5) the NDNR in consultation with the Republican River NRDs shall forecast the maximum amount of water that may be available from streamflow for beneficial use in the short term and long term to comply with the Compact. This forecast will be used to assist the NDNR and the NRDs in ensuring compliance with the Compact.

GROUND WATER CONTROLS

+ staying w/in annual allocation + compliance standard

The URNRD will implement the following ground water controls under the authority for the ground water component of this IMP in Neb. Rev. Stat. §§ 46-715 and 46-739 (Reissue 2004). The controls that NDNR and the URNRD agree are necessary for the integrated management of the water resource are a moratorium on new wells and irrigated acres as required by the Republican River Compact Settlement and groundwater allocations. The URNRD may choose to utilize a reduction in irrigated acres as an alternative to lowering groundwater allocations and incentive programs targeting acres with higher streamflow depletion factors as an alternative to District-wide acreage reduction or allocation reductions. These controls and incentive plans will be implemented through regulations are described in the "Ground Water Regulation" section of the URNRD's rules and regulations. These rules and regulations will be such that the district shall be in compliance with the compliance standards items one through seven (1-7) below. The

implies that lowering gw allocations is a control 37

URNRD may change these regulations without the approval of the NDNR so long as the compliance standards listed below are met. If these compliance standards are not met, the URNRD shall work with the NDNR to develop new rules and regulations that NDNR can agree will offset the excess depletions and will bring the district back into compliance with the compliance standards. The regulations must be such that NDNR agrees that the offsets and compliance will be achieved within two years of the determination that the compliance standard has been violated if the State as a whole is still in compliance with the Compact or within one year of the determination that the compliance standard has been violated if the State is not in compliance with the Compact.

1. Compliance Standards.

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A. Reduction in baseline pumping – The URNRD will adopt rules and regulations that will reduce pumping from the 1998-2002 baseline pumping to the extent necessary that when coupled with streamflow augmentation projects will maintain the District's net depletions within 44% of the State's allowable ground water depletions as accounted by the Republican River Compact Administration Ground Water Model. The NDNR will require that the IMPs adopted by the other Districts and the NDNR will also require depletions to be maintained within the 1998-2002 baseline stream flow depletions for each of those Districts.

B. Water short year pumping reductions - The URNRD will adopt rules and regulations to permit it to further reduce pumping in water short years when necessary to meet its proportionate share of Nebraska's water short year compliance under the Compact. To the extent possible, basin-wide incentive and stream flow augmentation programs will be used to reduce consumptive use in water short years. In the event that such incentive programs are not adequate, each District shall be responsible for reducing its depletions above Guide Rock to its share of Nebraska's allowable ground water depletions in proportion to the 1998-2002 baseline depletion figures.

2. If it is determined by the NDNR, after consultation with the URNRD, that all of the Districts are in compliance with their IMPs, that each of the IMPs is adequate to achieve that District's proportionate share of the reductions required by the NDNR, but that Nebraska is nonetheless out of compliance with the Compact, any additional required reductions will be established in proportion to each District's 1998-2002 baseline pumping figures and 1998-2002 baseline depletion proportions for both the five-year running average and for water short year compliance. Each District shall be responsible for reducing its depletions to the share of Nebraska's allowable ground water depletions in those proportions.
3. The URNRD and the NDNR recognize that the required reductions in water consumption could be accomplished by means other than those adopted in this IMP. The IMP and associated controls may need to be amended in the future to implement any such revisions.
4. At various times in the future, additional information may become available to the URNRD and the NDNR. As a result of this information, it may be determined that either

less or more reduction in ground water pumping in combination with additional water short year reductions is required for Nebraska to meet its obligations under the Compact. In the event it is determined that a different percent reduction is necessary to achieve Nebraska's compliance, or that a lesser reduction is needed to meet URNRD's proportionate share of Nebraska's obligation, the NDNR and the URNRD will amend the IMP and its necessary controls accordingly.

5. Accounting of credits for retired acres and stream flow augmentation – Any water savings generated through conservation programs, including acreage retirement or other conservation incentive programs undertaken through programs available throughout the Republican River Basin with the use of funds distributed by the State of Nebraska or the United States Government will be accounted as credits to the entire Republican River Basin and not to any District, regardless of the situs of the acreage included in the program or of the location of the effect of such water savings on the river system. Any water savings resulting from any such basin-wide programs shall be considered in the calculation of each District's depletions allocated to each of the Districts based upon the 1998-2002 baseline depletion proportions. However, should any District establish, fund, and implement its own such conservation program, available only for acreage within such District, the accounting of credit for the resulting water savings shall be given exclusively to that District. Also, if multiple Districts cooperate in a stream flow augmentation project, the benefits shall be allocated to each District based upon their share of the cost of the program.
6. The URNRD and the NDNR will make all documents, reports, records, computer runs or other calculations or material necessary to determine compliance with the Compact available to each other, regardless of whether such documents are available under the Nebraska Public Records Act or otherwise, unless such materials are identified as confidential under Nebraska statutes or by a ruling of a court of competent jurisdiction. Specifically, and without limitation, the URNRD agrees to continue to provide GIS coverage maps of all lands irrigated and to meter, record and provide to the NDNR its ground water usage records in a manner consistent with the requirements of the Republican River Compact Accounting Procedures; the NDNR agrees to provide to the URNRD all reports and records of the other Districts necessary to determine their compliance with reductions in accordance with the formula described above, as well as all documentation and reports utilized by the NDNR to determine the Basin's virgin water supplies and Nebraska's compliance with the Compact. In the event any materials are withheld by either NDNR or URNRD under a claim of statutory confidentiality, the party withholding such materials shall describe the contents of the materials and reasons for the denial in accordance with Neb. Rev. Stat. § 84-712.04 (Reissue 1999).
7. To accomplish the goals and objectives of this IMP, neither the URNRD nor the NDNR will require the IMP to be amended for the purpose of changing the responsibility of water users within the URNRD based on the failure of the other Districts to adopt, implement or enforce IMPs adequate to meet their proportionate share of the responsibility to achieve and maintain Nebraska's compliance with the Compact.

SURFACE WATER CONTROLS – Nebraska Department of Natural Resources (NDNR)

The authority for the surface water component of this IMP is Neb. Rev. Stat. §§ 46-715 and 46-716 (Reissue 2004). The surface water controls that will be continued and/or begun by the NDNR are as follows:

1. The NDNR will do the following additional surface water administration as required by the Settlement Agreement:
 - To provide for regulation of natural flow between Harlan County Lake and Superior-Courtland Diversion Dam, Nebraska will recognize a priority date of February 26, 1948 for Kansas Bostwick Irrigation District, the same priority date as the priority date held by the Nebraska Bostwick Irrigation District's Courtland Canal water right.
 - When water is needed for diversion at Guide Rock and the projected or actual irrigation supply is less than 130,000 acre-feet of storage available for use from Harlan County Lake as determined by the Bureau of Reclamation using the methodology described in Harlan County Lake Operation Consensus Plan attached as Appendix K to the Settlement Agreement, Nebraska will close junior, and require compliance with senior, natural flow diversions of surface water between Harlan County Lake and Guide Rock.
 - Nebraska will protect storage water released from Harlan County Lake for delivery at Guide Rock from surface water diversions.
 - Nebraska, in concert with Kansas and in collaboration with the United States, and in the manner described in Appendix L to the Settlement Agreement, will take actions to minimize the bypass flows at Superior-Courtland Diversion Dam.
2. Metering of all surface water diversions at the point of diversion from the stream will continue to be required. For surface water canals that are not part of a Bureau of Reclamation project, farm turnouts will be required to install and maintain a NDNR approved measuring device by the start of the 2005 irrigation season. All measuring devices shall meet the NDNR standards for installation, accuracy and maintenance. All appropriators will be monitored to ensure that neither the rate of diversion nor the annual amount diverted exceeds that allowed by the applicable permit or by statute.
3. The NDNR's moratorium on the issuance of new surface water permits was made formal by Order of the Director dated July 14, 2004. Exceptions may be granted by the NDNR to the extent permitted by Neb. Rev. Stat. § 46-714(3) (Reissue 2004) or to allow issuance of permits for existing reservoirs that currently do not now have such permits. Such reservoirs are limited to those identified through the Settlement Agreement required inventory of reservoirs with over 15 acre-feet capacity.
4. All proposed transfers of surface water rights shall be subject to the criteria for such transfers as found in Neb. Rev. Stat. §§ 46-290 to 46-294.04 (Reissue 2004) and

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related NDNR rules or the criteria found in Neb. Rev. Stat. §§ 46-2,120 to 46-2,130 (Reissue 2004) and related NDNR rules.

5. The NDNR completed adjudicated individual appropriators in the Republican River Basin upstream of Guide Rock in 2004. The results of that adjudication provided up-to-date records of the number and location of acres irrigated with surface water by such appropriators. Those records will be used by the NDNR to monitor use of surface water and to make sure that unauthorized irrigation is not occurring. The NDNR will also be proactive in initiating subsequent adjudications whenever information available to the NDNR indicates the need for adjudication as outlined by state statutes.

At this time, due to the already limited availability of surface water supplies, the NDNR will not require that surface water appropriators apply or utilize additional conservation measures or that they be subject to other new restrictions on surface water use except that the NDNR shall implement regulations to ensure that surface water users do not deplete streamflow by more than 32% basin wide of the allowable depletions on a five-year running average or, if it is a water short year, on a two year running average. If the State of Nebraska is operating under a Compact plan that allows for a three year running average compliance standard in water short years, a three year compliance standard will be used to measure surface water compliance. Should precipitation levels result in reduced stream flow, any streamflow that results from reduction in ground water pumpage by ground water uses in existence at the time the URNRD was declared to be fully appropriated shall not be allowed to be diverted by surface water appropriators.

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6. ~~_, except to limit the use of surface water available for use as the result of groundwater regulations and incentive programs implemented with the purpose of reducing Nebraska's beneficial consumptive use, by the amount that groundwater depletions were reduced by such programs, during years that Nebraska's allocation is less than it would have been under average precipitation across the basin, as necessary to maintain compliance with the Republican River compact and settlement. However, the NDNR shall implement regulations to ensure that surface water users do not deplete streamflow by more than 32% basin wide of the allowable depletions on a five year running average or, if it is a water short year, on a two year running average. If the State of Nebraska is operating under a Compact plan that allows for a three year running average compliance standard in water short years, a three year compliance standard will be used to measure surface water compliance. The Department also reserves the right to request, in the future, that this IMP be modified to require any such additional measures. In the event such a request is made, the NDNR will "allow the affected surface water appropriators and surface water project sponsors a reasonable amount of time, not to exceed one hundred eighty (180) days, unless extended by the NDNR, to identify the conservation measures to be applied or utilized, to develop a schedule for such application and utilization, and to comment on any other proposed restrictions." Neb. Rev. Stat. § 46-716(2) (Reissue 2004).~~

INCENTIVE PROGRAMS

Subject to the provisions of paragraph 5 under "Ground Water Regulations," above, the URNRD and the NDNR intend to establish and implement financial or other incentive programs to reduce beneficial consumptive use of water within the URNRD. As a condition for participation in an incentive program, water users, landowners or the URNRD may be required to enter into and perform such agreements or covenants concerning the use of land or water as are necessary to produce the benefits for which the incentive program is established.

Such incentive programs may include any program authorized by state law and/or Federal programs such as, but not limited to, the Conservation Reserve Enhancement Program (CREP) and Environmental Quality Incentives Program (EQIP) operated by the United States Department of Agriculture.

INFORMATION CONSIDERED

Information used in the preparation and to be used in the implementation of this IMP can be found in the simulation runs of the Republican River Compact Administration Ground Water Model, the formulae and data compliance tables of the Final Settlement Stipulation for the Compact, the URNRD's Rules, the URNRD's Ground Water Management Plan and additional data on file with the URNRD or the NDNR.

define compliance period

conference

Map 1. Upper Republican Natural Resource District

Upper Republican NRD

