

Doug W. Dunham

From: Tom Merrifield [tom@balmorheahydrogeological.com]
Sent: Monday, May 10, 2010 10:16 AM
To: Doug W. Dunham
Subject: RE: Assured and Adequate Water Supply Efficiency Work Group Update

Dear Mr. Dunham,

I apologize for being late on this submittal, and there was much more that I would have liked to comment on, but was restricted by time. For that I apologize again. These are my comments.

1. It should be stated where maximum static (not pumping or dynamic as measured in the proposed well) water level is measured after 100 years. I would recommend the property line.
2. In several places there is reference to a rule that has yet to be approved or completed the rulemaking process. I think there should be caution on what the resulting rule will require in these guidelines. It may be better to hold off on those restrictions for now.
3. I think it is good to allow more flexibility in the time required for pump testing as compared to the previous guidelines in 2007.
4. For model area domain are you saying the one can use an analytical mathematical model to determine the 1 foot drawdown to determine the study area?
5. Anderson and Woessner (1992) state "A model is any device that represents an approximation of a field situation." I think what is lacking in this document is the assessment of the approximations. If one does this correctly, the type of model necessary will fall out. In your submittal, it is not the cart before the horse, just a cart with no horse.
6. The limitations of analytical models are not correct and need to be corrected.
7. I disagree with the way ADWR has used proposals in the past. It appears to me from experience that you use them to push a modeling or other approach without commenting on what was submitted. For this reason they always seem to be a waste of time and money for all parties.

Sincerely,
George T. (Tom) Merrifield, Jr., RG

From: Doug W. Dunham [mailto:dwdunham@azwater.gov]
Sent: Friday, May 07, 2010 10:33 AM
To: Michelle A. Moreno; 'tom@balmorheahydrogeological.com'
Subject: RE: Assured and Adequate Water Supply Efficiency Work Group Update

As long as we get them by COB Monday that should be fine.

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From: Michelle A. Moreno
Sent: Friday, May 07, 2010 9:40 AM