

October 17, 2025

DOCKETSUPERVISOR@AZWATER.GOV

Arizona Department of Water Resources
Attn: Sharon Scantlebury, Docket Supervisor
1802 W. Jackson Street
Phoenix, Arizona 85007

Re: Comments to CAGR D 2025 Plan of Operation

Dear Ms. Scantlebury:

On behalf of Buckeye Tartesso, LLC, we are submitting this letter commenting on the 2025 Plan of Operation for the Central Arizona Groundwater Replenishment District (“CAGR D”) dated August 12, 2025 (the “Plan”), recently submitted to the Director of the Arizona Department of Water Resources (“Director”).

Pursuant to A.R.S. § 45-576.03(I), the Director has determined that the Plan contains sufficient information to determine whether the Plan is consistent with achieving the management goal of an active management area (“AMA”) where a member land or member service area is or may be located. The AMAs that contain member lands or member service areas are the Phoenix, Pinal and Tucson AMAs. Under A.R.S. § 45-576.03(M), the Director is now required to review the Plan and issue a determination whether or not the Plan is consistent with achieving the management goal of those AMAs. Further, A.R.S. § 45-576.03.N requires the Director to determine that the Plan is consistent with achieving the management goal of a particular AMA, if the Plan demonstrates all of the elements described in A.R.S. § 45-576.03(N)(1) – (4) for that AMA.

In our view, the Plan clearly demonstrates all of the elements described in A.R.S. § 45-576.03(N) (1) – (4) for each of the Phoenix, Pinal and Tucson AMAs. Therefore, we urge the Director to determine that the Plan is consistent with achieving the management goal of each of the Phoenix, Pinal and Tucson AMAs. In addition, we urge the Director to issue these determinations prior to the end of this year, so that the Plan takes effect before the 2015 Plan of Operation for the CAGR D lapses.

CAGR D has been a significant driver in economic development for the past 30 years and its continued viability is essential to continued success. There are ample groundwater supplies available to support development in Buckeye and a development scenario that relies on groundwater use backed by replenishment is one of the most cost effective and reliable ways to provide water service in our growing communities. CAGR D needs the support and resources to

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continue to perform its essential role and we are confident that with sufficient resources, it can meet its obligations into the future.

Thank you for the opportunity to comment on the Plan, and we look forward to a determination by the Director that the Plan is consistent with achieving the management goal of the Phoenix, Pinal and Tucson AMAs.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Anderson", written in a cursive style.

Robert D. Anderson

cc: Chris Barr

RDA/mg