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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTIES OF MARICOPA AND APACHE**

IN RE THE GENERAL ADJUDICATION  
OF ALL RIGHTS TO USE WATER IN  
THE GILA RIVER SYSTEM AND  
SOURCE

W-1 (Salt)  
W-2 (Verde)  
W-3 (Upper Gila)  
W-4 (San Pedro)  
(Consolidated)

IN RE THE GENERAL ADJUDICATION  
OF ALL RIGHTS TO USE WATER IN  
THE LITTLE COLORADO RIVER  
SYSTEM AND SOURCE

AND  
Contested Case No. CV6417

AND  
Contested Case No. W1-11-1511

**ARIZONA DEPARTMENT OF  
WATER RESOURCES' REPLY TO  
BRIEFS ON ISSUES OF BROAD  
LEGAL IMPORTANCE**

Honorable Scott Blaney  
Special Master Sherri Zendri

**CONTESTED CASE NAME:** *In re ASLD – Fred & Carol Telles*

**HSR INVOLVED:** None.

1 **DESCRIPTIVE SUMMARY:** The Arizona Department of Water Resources (“ADWR”) provides its reply to the briefs filed in this proceeding regarding issues of broad legal importance.

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3  
4 **NUMBER OF PAGES:** Nine and sixteen-page attachment

5 **DATE OF FILING:** July 31, 2025

6 In accordance with the Court’s Notice of Designation of Issues of Broad Legal  
7 Importance filed on March 28, 2025 and Revised Notice of Designation of Issues of Broad  
8 Legal Importance filed on May 19, 2025, ADWR hereby provides its reply to the Parties’  
9 briefs.<sup>1</sup> The Parties’ briefs broadly fell into two camps: one that insists on requiring  
10 certification for every stockpond for which a right is to be decreed and one that supports  
11 that *de minimis* stockponds with an active Stockpond Registration Act filing (“SPRA  
12 filing”) should be eligible for a decreed right. ADWR supports the latter, and joins in the  
13 arguments made in the briefs filed by the Arizona State Land Department, ASARCO, LLC,  
14 Aztec Land & Cattle Company, Ltd., Bar T Bar Ranch, Inc., Bayless & Berkalew Company,  
15 Flying M. Ranch, LLLP, J. Albert Brown Ranches, Inc., City of Flagstaff, and Baca Float  
16 #3 LLC. Statute, case law, and practicality support ADWR’s position that an active SPRA  
17 Filing is sufficient to form a basis of right for a *de minimis* stockpond.

18 **A. The plain language of and legislative intent for the Stockpond Registration Act**  
19 **(“SPRA”) supports active SPRA Filings forming a basis of right for a *de minimis***  
20 **stockpond.**

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<sup>1</sup> ADWR received briefs on these issues of broad legal importance from the following  
25 Parties: [ASARCO, LLC et. al](#); [Arizona State Land Department](#); [City of Flagstaff and Baca](#)  
26 [Float #3 LLC](#); [Aztec Land & Cattle Company et. al](#); [San Carlos Apache Tribe](#); [Salt River](#)  
[Project](#); [Tonto Apache Tribe](#); and the [Gila River Indian Community](#).

1 Throughout its brief, the Salt River Project (“SRP”) compares Article 10, which outlines  
2 the SPRA, to Article 5, which outlines the requirements for applications and certifications  
3 of permits to appropriate (“33 Applications”). While there are some similarities, the  
4 differences between them are important and significant.

5 **1) Key Difference #1: Stockpond *Registration* Act vs. *Application* for**  
6 **Permit to Appropriate Water**

7 At ADWR there is a significant difference between registrations and applications  
8 department-wide. Registrations are filings associated with already-existing water uses and  
9 rights, whereas applications are supposed<sup>2</sup> to be for proposed appropriations and uses. An  
10 example of another type of registration found within the Surface Water Code is Article 7,  
11 Water Rights Registration, which was enacted to register already-existing pre-1919 water  
12 rights with ADWR through the filing of Statements of Claim of Right (“36 Filings”).

13 **2) Key Difference #2: “The owner of any stockpond...*shall have a valid***  
14 ***water right* in such stockpond”<sup>3</sup> vs. “Any person...*intending to acquire***  
15 ***the right* to the beneficial use of water, shall make an application”<sup>4</sup>**  
16

17 The legislature enacted the SPRA to legally recognize already existing water rights. The  
18 language of A.R.S. § 45-272(A), included above, is evidence of this. Additionally, the  
19 SPRA Filing itself is the actual claim of water right, analogous to 36 Filings. Similar to 36  
20 Filings, the claim must be certified as true under penalty of perjury and accompanied by a  
21 nominal filing fee.<sup>5</sup> This is entirely dissimilar from those applying for a permit to

22 <sup>2</sup> Practically speaking, ADWR often gets applications department-wide for already-existing  
23 appropriations and uses. However, the statutory scheme does not account for this reality.

24 <sup>3</sup> A.R.S. § 45-272 (A).

24 <sup>4</sup> A.R.S. § 45-152 (A) (emphasis added).

25 <sup>5</sup> See A.R.S. § 45-273 (D) and (E), § 45-183 (A)(8) (requiring that a 36 Filing be  
26 accompanied by a “sworn statement that the claim set forth is true and correct”), and §45-  
183 (C).

1 appropriate public waters, which specifies that only those “intending to acquire the right”  
2 must apply – not those who already have a right and must notify the Department of such.

3 The legislative history also supports this understanding. The Senate Committee on  
4 Natural Resources, to which the SPRA was referred, met on March 8, 1977 to discuss the  
5 Act.<sup>6</sup> During that meeting, Mr. Byron Lewis, an attorney representing SRP, specified that  
6 *filing* for a stockpond was mandatory “to claim the priority date [the owner] is actually  
7 entitled to”.<sup>7</sup> Prior to the SPRA’s passage, Mr. F.C. Ryan, Director of the Water Rights  
8 Division of the State Land Department expressed concern “[r]egarding the administration  
9 of the act” due to the deadlines found therein, “which could cause personnel problems” due  
10 to the “heavy load” of administering the stockpond registration program.<sup>8</sup>

11 **B. Case law supports that active SPRA Filings form a sufficient basis of right for**  
12 **de minimis stockponds.**  
13

14 ADWR, along with all parties whose position ADWR joins in, have outlined how  
15 Special Master Thorson’s Memorandum Decision, Findings of Fact, and Conclusions of  
16 Law for Group 1 Cases Involving Stockwatering, Stockponds, and Domestic Uses filed on  
17 November, 14, 1994 (“*De Minimis* Decision”) supports active SPRA Filings forming a  
18 sufficient basis of right for *de minimis* stockponds.<sup>9</sup> To put it simply, Thorson’s *De Minimis*  
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20 <sup>6</sup> See Attachment A - Minutes of Committee on Natural Resources, Arizona State Senate  
21 Thirty-Third Legislature First Regular Session, March 8, 1997, 8:30 A.M.

22 <sup>7</sup> *Id.* at 2.

23 <sup>8</sup> *Id.* at 3.

24 <sup>9</sup> See the following filings made on June 30, 2025 in the above-captioned contested cases:  
25 [ADWR’s Comments on Issues of Broad Legal Importance](#), at 3-5; [Arizona State Land](#)  
26 [Department’s Response to Issues of Broad Legal Importance and Joinder in Aztec Land &](#)  
[Cattle Company, Bar T Bar Ranch, Bayless & Berkalew, Flying M Ranch, and J. Albert](#)  
[Brown Ranches Response](#), at 2-5; [Response to Revised Notice of Designation of Issues of](#)  
[Broad Legal Importance and Joinders](#), filed by the City of Flagstaff and Baca Float #3 LLC,

1 Decision specifically lists “[f]ilings pursuant to the Stockpond Registration Act” as a  
2 possible legal basis of right for a *de minimis* stockpond.<sup>10</sup> For 173 water rights in stockponds  
3 already entered into the Partial Catalog of Proposed Water Rights, the Court honored  
4 Special Master Thorson’s plain language allowing SPRA Filings to form a basis of right for  
5 a *de minimis* stockpond. The Court should not overturn this precedent now.

6 **C. ADWR does not have the time or resources to certificate every stockpond in the**  
7 **State, and requiring the Department to do so would slow down the General**  
8 **Stream Adjudication for decades on small water uses already deemed legally**  
9 **insignificant.**

10 As outlined in ADWR’s Comments on Issues of Broad Legal Importance, there are over  
11 16,000 uncertificated stockponds in Arizona.<sup>11</sup> Of those, only 522 have been noticed  
12 pursuant to A.R.S. § 45-274. ADWR posts online notice of all stockponds for sixty days.  
13 SRP asserted in their Brief that stockponds are not often protested.<sup>12</sup> This is true – only two  
14 of the 522 uncertificated and noticed stockponds were protested. However, this fact does  
15 not mitigate the overwhelming reality of the administrative backlog ADWR inherited from  
16 its predecessor. An administrative backlog that the State Land Department foresaw<sup>13</sup> and  
17 would take ADWR at minimum 518 working years to certificate.<sup>14</sup> ADWR’s Surface Water  
18

19 at 2-3; and [Response to Issues of Broad Legal Importance and Joinder in the Arizona State](#)  
20 [Land Department’s Response to Issues of Broad Legal Importance](#), at 2-5.

<sup>10</sup> *De Minimis* Decision at 4-5.

21 <sup>11</sup> [ADWR’s Comments on Issues of Broad Legal Importance](#), *In re ASLD – Fred & Carol*  
22 *Telles*, W1-11-1511, June 30, 2025, 6.

23 <sup>12</sup> [Salt River Project’s Brief Addressing Issues of Broad Legal Importance](#), *In re ASLD –*  
*Fred & Carol Telles*, W1-11-1511, June 30, 2025, 14, ln.13-16.

24 <sup>13</sup> *See infra* Sec. (A)(2), p. 4, ln. 7-10.

25 <sup>14</sup> Generously assuming ADWR could evaluate, investigate, inspect, and notice five  
26 stockponds per day, then calculated by multiplying the number of uncertificated  
stockponds, less the 522 already noticed, by sixty and dividing that number by 260 (the  
number of working days in a calendar year not accounting for public holidays).

1 Section is supervised by one Section Manager and one Supervisor, with six Water  
2 Resources Specialists total and at most the equivalent of one full-time employee working  
3 on SPRA Filings and Certificates. Even if every staff member within the Surface Water  
4 Section worked full-time on processing SPRA Filings, neglecting all other applications, it  
5 would take those eight staff members at least 64 years and 9 months to process them all.<sup>15</sup>

6 *De minimis* proceedings in the San Pedro River Watershed, the Lower Little Colorado  
7 River Watershed, the Silver Creek Watershed, and the Verde River Watershed were  
8 authorized by the Court because the benefit of determining the specific attributes for small  
9 water uses did not outweigh the cost of litigation.<sup>16</sup> Indeed, in the Court’s *De Minimis* Order  
10 in the Silver Creek Watershed, the Court wrote that “summary procedures [are] designed to  
11 streamline the determination of water rights...so cases can proceed to completion more  
12 quickly thereby alleviating substantial management burden.”<sup>17</sup> ADWR agrees that the

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14 <sup>15</sup> This calculation does not account for sick days, annual leave, or state holidays.

15 <sup>16</sup> See *De Minimis* Decision at 8 (describing that [*d*]e *minimis* is fundamentally a case  
16 management determination by a court that the benefits of resolving certain types of disputes  
17 are substantially outweighed by the costs of doing so.”); [Report of the Special Master on  
18 Summary Proceedings in the Lower Little Colorado Subwatershed](#), *In re Lower Little  
19 Colorado River Subwatershed*, CV6417-400, October 30, 2020, at 16 (holding that “a  
20 detailed adjudication of the thousands of [stockponds and stock and wildlife watering]  
21 claims would impose an unwarranted burden on the parties and the court.”) ; [Report of the  
22 Special Master on Summary Proceedings in the Silver Creek Watershed](#), *In re Reporting of  
23 Diversion Information and Other Objections*, CV6417-033-9005R, August 23, 2022, at 12  
24 (describing “the final step in a *de minimis* determination” as “determin[ing] whether those  
25 benefits justify the burden on judicial, administrative, and litigant resources to conduct a  
26 complete adjudication”); [Final Report of the Special Master Concerning Summary  
Adjudication Proceedings in the Verde River Watershed](#), *In re Subflow Technical Report,  
Verde River Watershed*, W1-106, February 13, 2025, at 2 (describing that “[a] summary  
adjudication procedure must assure that the adjudication of these claims still appropriately  
addresses objections filed by other claimants while not engaging all involved into protracted  
litigation over a nominal amount of water.”).

<sup>17</sup> [Report of the Special Master on Summary Proceedings in the Silver Creek Watershed](#), *In  
re Reporting of Diversion Information and Other Objections*, CV6417-033-9005R, August  
23, 2022, at 13.

1 purpose of *de minimis* proceedings is to streamline the adjudication of small water rights,  
2 thus minimizing the burden to all involved.

3 Each *de minimis* stockpond has already undergone an evaluation by ADWR's  
4 Adjudications Division. This investigation broadly includes a review of any applicable  
5 Statements of Claimant, 36 Filings, 38 Filings, or 33 Filings and aerial imagery review to  
6 verify the stockpond's location and capacity. Certification would require ADWR's Surface  
7 Water Section to then follow its certification process. The Court would then review two  
8 rounds of ADWR's work, and objectors and parties to the contested case would be given  
9 the opportunity to comment on the proposed abstracts. ADWR does not think there is any  
10 appreciable value in replicating the verification of each stockpond claim in triplicate, as  
11 described above, given what a significant amount of resources that process entails for water  
12 uses that amount to so little.

13 **D. The Court should not allow parties a second chance to challenge the bases of**  
14 **rights for those abstracts already entered in the Catalog of Proposed Water**  
15 **Rights.**

16 Most of the parties involved in briefing these issues of broad legal importance were also  
17 parties to each of the contested cases from which the 173 abstracts with SPRA Filings listed  
18 as the basis of right originated. A summary of parties' relevant comments<sup>18</sup> regarding the  
19 bases of rights to those abstracts is provided as Attachment B to this filing. Of note is that  
20 while comments were filed in almost every contested case related to the 173 abstracts, and  
21 the Court provided the opportunity to file comments in each one, none of the parties  
22 involved in these proceedings brought up that the listed basis of right was uncertificated in  
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24 <sup>18</sup> Due to time constraints in writing this Reply, Deputy Counsel for ADWR only reviewed  
25 the comments filed by the parties who have taken a position in their briefs filed on these  
26 issues of broad legal importance that an SPRA Filing must be certificated to form a valid  
basis of right.

1 their comments submitted to the Court. In fact – while parties pointed out other deficiencies  
2 in the basis of right, whether the SPRA Filing was certificated was never one of those  
3 deficiencies. As an example, SRP provided the following as a comment to several abstracts  
4 issued as part of Contested Case No. W1-11-1432: “[Specific 38 Number] is held by the  
5 ASLD and constitutes a proper Basis of Right for this water right.”<sup>19</sup>

6 While the Rules for Proceedings Before the Special Master allow for objections after  
7 the filing of the Catalog, § 15.05 requires that “Objectors to the catalog of proposed water  
8 rights must not assert objections that reasonably could have been asserted during the  
9 original 180-day objection period for that watershed or reservation HSR.” Similarly, here,  
10 objectors are attempting to change their course after having ample opportunity to challenge  
11 each of the 173 abstracts’ basis of right during multiple contested case status conferences  
12 and in their comments to the draft abstracts prior to the Special Master entering the abstracts  
13 into the Catalog of Proposed Water Rights. This is not only improper and inefficient, but  
14 goes against the due process rights and reasonable expectations for the claimants whose  
15 rights have been entered into the Catalog.

#### 16 **E. Conclusion**

17 This Court has the authority to manage litigation, and *de minimis* proceedings were  
18 authorized to do just that. Statute, case law, and practicality all weigh in favor of allowing  
19 SPRA Filings to serve as a valid basis of right for *de minimis* stockponds.  
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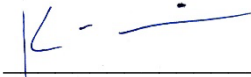
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25 <sup>19</sup> See [Salt River Project’s Suggested Corrections to Proposed Abstracts](#), *In re ASLD – H.*  
26 *Clifford Dobson, Jr. Ranch*, W1-11-1432, July 11, 2022, at 3, ln. 3-4, 11-12, 25-26; 4, ln.  
14-13, 20-21; 5, ln.7-8, 14-15, 25-26; 6, ln. 6-7, 14-15, 20-21; 7, ln. 1-2.

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**DATED** this 31st day of July, 2025.

ARIZONA DEPARTMENT OF WATER  
RESOURCES



\_\_\_\_\_  
Karen J. Nielsen, Deputy Counsel

**ORIGINAL** of the foregoing and attachment  
sent by first-class mail on July 31, 2025, to:

Clerk of the Maricopa Superior Court  
Attn: Water Case  
601 W. Jackson Street  
Phoenix, Arizona 85003

Clerk of Apache County Superior Court  
70 West Third South  
St. Johns, Arizona 85936

**COPIES** of the foregoing  
sent by first-class mail on July 31, 2025, to:

Judge Blaney  
Maricopa County Superior Court  
East Court Building  
101 West Jefferson Street, Suite 411  
Phoenix, Arizona 85003

**COPIES** of the foregoing  
sent by electronic mail on July 31, 2025, to

Special Master Sherri Zendri  
[water@jbazmc.maricopa.gov](mailto:water@jbazmc.maricopa.gov)

**COPIES** of the foregoing  
sent by first-class mail on July 31, 2025, to all  
parties on the court-approved mailing lists for  
Contested Case No. W1-W4, CV6417, and W1-11-1511.

  
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# **ATTACHMENT A**

RECEIVED *all MKS*  
*eh*

MAR 3 1977

ARIZONA STATE SENATE  
THIRTY-THIRD LEGISLATURE  
FIRST REGULAR SESSION

ARIZONA STATE SENATE

MINUTES OF COMMITTEE ON NATURAL RESOURCES

DATE MARCH 8, 1977 TIME 8:30 A.M. ROOM HR-2

Chairman Swink called the meeting to order at 8:37 o'clock a.m. and roll call was taken.

MEMBERS PRESENT

Senator Farr  
Senator Hardt  
Senator Kolbe  
Senator Mack  
Senator Moore  
Senator Tenney  
Senator Turley  
Senator Getzwiller  
Senator Swink

MEMBERS ABSENT

None

OTHERS PRESENT

See attached lists

ADOPTION OF MINUTES

The minutes of the meeting held on March 1, 1977 were approved as submitted.

CONSIDERATION OF BILLS

S.B. 1019 - registration of water rights to stockponds (AMEND, DO PASS)

Senator Turley moved the bill with a do pass recommendation and he moved a printed amendment. (ATTACHMENT #1)

Mr. John Olson, Executive Vice President of the Arizona Cattle Growers' Association, spoke in favor of the bill and said it is necessary and would be beneficial to Arizona to clear up some uncertain conditions on water rights. He noted that over the years structures had been built without clear and defined water rights and this bill would help that uncertainty. He said his association worked with the Salt River Project and others and came up with what they believe to be acceptable amendments which were the ones moved by Senator Turley and he urged passage of the bill.

Mr. Olson explained that the bill clears up simple language and reduces the size of a stockpond from 25 acre feet to 15 acre feet. He said where reference is made to watering of livestock or wildlife, the bill applies an exception for fish and he explained that this is not to say that a stockpond built solely for livestock watering or wildlife watering could not be used with fish.

Mr. Olson said on page 2, lines 9 through 13 of the bill, prior rights are established. Senator Kolbe expressed concern that this language would make all appropriable rights having priority over that stockpond.

Mr. Byron Lewis, an attorney representing the Salt River Project, responded that the reason this language was changed was to insure people who had prior appropriable rights were protected. He said the latter certificated water right would have priority over stockponds and this was done to protect the constitutionality of the legislation. He noted that the stockpond right was never legally recognized to this point and this bill would give legal recognition of such from now on. Senator Kolbe said it was then true that priority would be given and Mr. Lewis agreed it would.

Mr. Lewis suggested that the word "PREVIOUSLY" be inserted on page 1, at the beginning of line 13 of the amendment. He also suggested on the amendment on page 1, line 22, that "SUBSEQUENT TO THE EFFECTIVE DATE OF THIS ACT" be inserted after "D." He suggested on page 2 line 4, ", EXCEPT FISH" be inserted after "WILDLIFE" and the same amendment on line 7.

Senator Kolbe noted that there is no other reference in the statutes to the word "PROTESTANT" and he suggested using "THE PROTESTING PARTY" wherever necessary in the bill.

Senator Kolbe asked if filing for a stockpond was mandatory and Mr. Lewis said it was and if a person does not file he can not claim the priority date he is actually entitled to so it would behoove anybody who had a stockpond to file under this bill.

Senator Farr said a stockpond was defined as 15 acre feet and he asked if a person who built a 20 acre foot stockpond would have to do anything. Mr. Lewis said they would go to the State Land Department and if water was available they could go ahead and receive appropriable rights to build the stockpond. He said the bill only takes those stockponds that exist in violation of the law and makes them valid but it would not prevent somebody from constructing a stockpond regardless of whether it was 15 feet or 20 feet.

Mr. Elmer Coker, an attorney representing himself, testified that many ponds were constructed by the Soil Conservation Service to prevent soil erosion and provide water for stock. Senator Turley said small potholes probably would not be registered and Mr. Coker agreed.

Senator Kolbe expressed concern about the definition of stockpond and asked if it would include water if a person sank for a well. Mr. Lewis explained that it would not under this bill and the bill talks only about water being appropriable under the state law and perculating ground water is not subject to appropriation. He said a person would not have to register that type of stockpond when using perculating water from the ground.

Mr. Lewis said after the effective date of this act if a person constructs a 20 acre foot stockpond he would go to the State Land Department and file an application to appropriate the water for beneficial purposes and they are not limited on the size if they can use that water for such purposes. He added that this bill is just to take care of the existing stockponds and the 15 acre feet was put in as a compromise. He said the stockponds used by the Soil Conservation Service are 1.6 acre feet.

Senator Turley interjected that this bill was patterned very much after the California act. Mr. Lewis noted that California has a 10 acre foot provision for grandfathering in

stockponds and it was felt this was not sufficient and 25 acre feet was too high so 15 acre feet was chosen since it is a compromise figure. He said the attempt was not to try to validate illegally some recreation lakes. He added that the Salt River Project is in favor of the bill.

Mr. F.C. Ryan, Director of the Water Rights Division of the State Land Department, said the department has no objection to the bill. Regarding the administration of the act, however, he had a few suggestions. He said the terminal date within which to perform would coincide with water rights registration act provisions on June 30, 1978 and he stressed that there would be a heavy load which could cause personnel problems.

In regards to language on page 2, line 32, Mr. Ryan said this was a change of pace and he wondered what it was founded on since it makes an extra step of notice they are not accustomed to. Mr. Lewis answered that this was probably taken from the California act and he saw no reason why it was needed in Arizona. Mr. Olson responded that much discussion was held on this and it was felt that everyone affected by the right of this water would have a fair chance to get their input in but he said they would have no objection to taking this language out.

Mr. Benson Scott, Chief of the Dam Safety Program of the Arizona Water Commission, testified representing the State Water Engineer, Mr. Steiner, and the Water Commission and he expressed their support of the amendment reducing to 15 acre feet. He urged removal of section 3 starting on page 3 of the bill since the commission would no longer be involved through their safety and dams program. Mr. Lewis and Mr. Olson both stated they would have no objection to the language on page 3 being stricken as well as page 4 and 5. Mr. Scott stated that the Water Commission as a matter of simplification had a suggestion for consideration that since this is a grandfather type clause it might be easier if there were a common priority date.

Senator Hardt noted that in the past many small stockponds had been put up with a bulldozer on a moments notice. Mr. Olson said people have to have permission to dig a stockpond and he said they really would not be stepping too far out of bounds on this. Senator Farr said people presently have to go to the State Land Department so he wondered why this point was reiterated in the amendment. Mr. Lewis replied that the reason is to take care of illegal diversion that has taken place in the past. He said over the years many stockponds have been constructed without the benefit of certificates and this would warn people that in the future they cannot get away with this.

Senator Farr noted that section D of the amendment made reference to future action and not grandfathering in and he expressed concern over this. Mr. Lewis reminded the committee of his earlier suggestions that "SUBSEQUENT TO THE EFFECTIVE DATE OF THIS ACT" be inserted. He said this act has a limited effect and from this point on the normal appropriation statutes of the state will be followed. Senator Farr felt reference should be made to a stockpond of any size in D since a person could get past the intent of the law if they built a big stockpond.

Senator Getzwiller expressed concern about the rancher who may not know about this and Mr. Lewis said the situation would be the same as any other water right violation that as long as nobody complains it goes along.

Senator Turley moved some amendments to the printed amendment as follows: Page 1, line 13, before "ISSUED" insert "PREVIOUSLY"; line 22, after "D." insert "SUBSEQUENT TO THE EFFECTIVE DATE OF THIS ACT"; page 2, lines 4 and 7, after "WILDLIFE" insert ", EXCEPT FISH". The MOTION carried.

Senator Farr moved a further amendment to the amendment on page 1, line 22, after "STOCKPOND" to insert "OF ANY SIZE". The MOTION carried.

Senator Turley moved the amendment as amended and the MOTION carried.

Senator Turley moved amendments to the bill as follows: Page 2, strike lines 32 and 33 and on line 34 strike "REQUEST FOR NOTICES AND MAY SEND A NOTICE OF CLAIM"; line 39, strike "PROTESTANT" insert "THE PROTESTING PARTY"; page 2, lines 2 and 12, strike "PROTESTANT" insert "THE PROTESTING PARTY"; line 3, strike "PROTESTANT'S" insert "PROTESTING PARTY'S"; strike lines 31 through 48 and strike pages 4 and 5. The MOTION carried.

Senator Tenney distributed an amendment. (ATTACHMENT #2) Mr. Coker said the amendment is very important to the overall water code to further define beneficial use. He noted that many areas in Arizona are flood irrigated and he said the amendment would state that if you accomplish the beneficial use of water by artificial means that you have not lost your right and he urged passage of the amendment.

Senator Tenney moved the amendment. Some discussion ensued relative to man-made diversionary works and Senator Turley moved to insert "REQUIRING" after "NOT" on line 2 of the amendment. The MOTION carried. Senator Tenney moved the amendment as amended and the MOTION carried.

Senator Turley moved the bill as amended with a do pass recommendation and the MOTION carried by a unanimous roll call vote. (ATTACHMENT #3)

S.B. 1382 - land department fees (HELD)

Mr. M. J. Mirkin, General Manager of the Arizona State Land Department, said all members of the committee had been furnished with background and support material. In addition he read a formal statement from Andrew Bettwy the State Land Commissioner. (ATTACHMENT #4)

Ms. Mildred F. Schupp representing the Tucson Gem & Mineral Society, Inc., testified that she has been concerned for some time about access to state land and she added that the group she represents are responsible people and they do not want to trespass. She expressed concern about the bill in regards to what "temporary" means and whether the permits were for groups or individuals. She noted that there are 400 members in her group. Ms. Schupp also expressed concern about the blank space in front of the dollar sign in the bill. She wondered who would check areas to determine environmental suitability for the proposed use. Ms. Schupp suggested that an interim study committee be appointed to work on the whole question of use of state lands and prepare legislation for later consideration.

Mrs. Gary Wright spoke representing Arizona Appaloosa Association and Arizona DIRT. She said her groups like to enjoy the desert with as little damage as possible and they would like to have free access or have the ability to purchase such. She concurred that the bill needed further study and a full blown plan needed to be adopted rather than copying a California rule. She said the Bureau of Land Management does not allow them to participate in their meetings. Mrs. Wright said she could not see being monied to death in paying fees.

Mr. Steve Turza representing the Grinnell Natural History Society testified that the bill had no provision for an organization such as his and perhaps every member would have to pay for a permit for a field trip. He noted that a group permit fee provision was needed in the bill. He also queried as to what the fee money would be used for and said his group would like to see it used for enforcement and protecting the habitat and developing the public use. He said he had been told that enforcement would be left to the honor system which he did not place much faith in since he felt without proper enforcement there would be much damage in the desert.

# **ATTACHMENT B**

**ATTACHMENT B: Summary of Parties’ Relevant Comments Regarding Bases of Rights for 173 Abstracts Already Entered into the Catalog of Proposed Water Rights**

W1-11-19A			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
111-19-002-SP001	38-81495; 3R-1651	2017	None found.
111-19-002-SP002	38-81495; 3R-1652	2017	None found.

W1-11-0067			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
111-19-058-SP001	38-96113	2024	None found.

W1-11-1432			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
112-14-027-SP001	38-88683	2022	<u>SRP’s Suggested Corrections to Proposed Abstracts</u> : “SPRA filing No. 38-88683 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.3, ln.3-4
112-14-027-SP002	38-88682	2022	<u>SRP’s Suggested Corrections to Proposed Abstracts</u> : “SPRA filing No. 38-88682 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.3, ln. 11-12
112-14-027-SP003	38-88814	2022	None found.
112-14-027-SP004	38-88713	2022	<u>SRP’s Suggested Corrections to Proposed Abstracts</u> : “SPRA Filing No. 38-88713 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.3, ln. 25-26
112-14-027-SP006	38-88627	2022	<u>SRP’s Suggested Corrections to Proposed Abstracts</u> : “SPRA filing No. 38-88627 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.4, ln. 13-14
112-14-027-SP007	38-88650	2022	<u>SRP’s Suggested Corrections to Proposed Abstracts</u> : “SPRA filing No. 38-88650 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.4, ln. 20-21
112-14-027-SP008	38-88637	2022	<u>SRP’s Suggested Corrections to Proposed Abstracts</u> : “SPRA filing No. 38-88637 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.5, ln. 7-8
112-14-027-SP009	38-88750	2022	<u>SRP’s Suggested Corrections to Proposed Abstracts</u> : “SPRA filing No. 38-88750 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.5, ln. 14-15

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<b>112-14-027-SP010</b>	38-94537	2022	None found.
<b>112-14-027-SP011</b>	38-23188	2022	<a href="#">SRP’s Suggested Corrections to Proposed Abstracts</a> : “SPRA filing No. 38-23188 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p. 5, ln. 25-26
<b>112-14-027-SP012</b>	38-88815	2022	<a href="#">SRP’s Suggested Corrections to Proposed Abstracts</a> : “SPRA filings Nos. 38-88815 and 38-88796 are held by the ASLD and constitute a proper Basis of Right for this water right.” p.6, ln. 6-7.
<b>112-14-027-SP013</b>	38-94753	2022	<a href="#">SRP’s Suggested Corrections to Proposed Abstracts</a> : “SPRA filing No. 38-94753 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.6, ln. 13-14.
<b>112-14-027-SP014</b>	38-88389	2022	<a href="#">SRP’s Suggested Corrections to Proposed Abstracts</a> : “SPRA filing No. 38-88389 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.6, ln. 20-21.
<b>112-14-027-SP015</b>	38-94633	2022	<a href="#">SRP’s Suggested Corrections to Proposed Abstracts</a> : “SPRA filing No. 38-94633 is held by the ASLD and constitutes a proper Basis of Right for this water right.” p.7, ln. 1-2

**W1-11-0067**

<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
<b>111-19-058-SP001</b>	38-96113	2024	None found.

**W1-11-232**

<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
<b>111-20-032-SP002</b>	38-19221	2024	<a href="#">Salt River Project’s Suggested Corrections to Proposed Abstracts, filed Jan. 9, 2023</a> : “The basis of right for this stockpond PWR is Stockpond Registration Act (“SPRA”) filing number 38-19221.” p.5, ln. 1-2. <a href="#">Salt River Project’s Suggested Corrections to Proposed Abstracts, filed July 5, 2024</a> : “SRP has no suggested corrections to this abstract. The abstract attached to the Order should be approved and added to the Catalog of Proposed Water Rights (“Catalog”).” p. 3, ln. 17-19.
<b>112-17-063-SP001</b>	38-94145	2024	<a href="#">Salt River Project’s Suggested Corrections to Proposed Abstracts, filed Jan. 9, 2023</a> : “The basis of right for this stockpond PWR is SPRA filing number 38-94145.” p. 9, ln. 20.

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			<a href="#">Salt River Project’s Suggested Corrections to Proposed Abstracts, filed July 5, 2024</a> : “SRP has no suggested corrections to this abstract. The abstract attached to the Order should be approved and added to the Catalog.” p. 4, ln. 3-4.
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W1-11-2401			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
113-05-005-SP001	38-81039	unable to locate	None found.
113-08-050-SP001	38-94519	<u>2021</u>	None found.
113-09-001-SP001	3R-1148; 38-81038; Certificate of Water Right 2187	<u>2021</u>	None found.
113-09-001-SP002	38-94564	<u>2021</u>	None found.
113-09-001-SP003	38-23187	<u>2021</u>	None found.
113-09-001-SP005	3R-1149; 38-94754; Certificate of Water Right 2188	<u>2021</u>	None found.

W1-11-2421			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
113-08-014-SP001	38-27711	<u>2019</u>	None found.
113-08-014-SP004	38-27716	<u>2019</u>	None found.
113-08-014-SP005	38-27714	<u>2019</u>	None found.
113-08-014-SP006	38-27720	<u>2019</u>	None found.

W1-11-2590			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
113-09-019-SP001	3R-2545; 38-88409; CWR 3884	<u>2021</u>	<a href="#">Salt River Project’s Suggested Corrections to Proposed Abstracts</a> : “In the ‘Basis of Right’ section of the abstracts, SRP suggests that the abstracts also include the Application number (if applicable)_ along with the Certificate of Water Right Number.” p. 2, ln. 5-7
113-09-019-SP002	38-88468	<u>2021</u>	See above.
113-09-019-SP003	38-27307; 38-94289	<u>2021</u>	See above.

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<b>113-09-019-SP008</b>	3R-2546; 38-88484; CWR 3885	<u>2021</u>	See above.
<b>113-09-019-SP009</b>	3R-2537; 38-88841; CWR 3972	<u>2021</u>	See above.
<b>113-09-019-SP011</b>	3R-2538; 38-33795; CWR 3878	<u>2021</u>	See above.
<b>113-09-019-SP013</b>	3R-2539; 38-88478; CWR 3973	<u>2021</u>	See above.
<b>113-09-019-SP014</b>	38-88483	<u>2021</u>	See above.
<b>113-09-019-SP015</b>	38-88622	<u>2021</u>	See above.

**W1-11-2665**

<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
<b>113-09-016-SP001</b>	38-81509	<u>2019</u>	None found.
<b>113-09-016-SP002</b>	38-81510	<u>2019</u>	None found.
<b>113-12-005-SP001</b>	38-17073	<u>2019</u>	None found.

**W1-11-2666**

<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
<b>113-12-011-SP001</b>	38-12064; 38-94273	<u>2021</u>	None found.
<b>113-12-011-SP002</b>	36-4755; 38-12071; 38-94274	<u>2021</u>	None found.
<b>113-12-011-SP003</b>	38-12068; 38-94272	<u>2021</u>	None found.
<b>113-12-011-SP004</b>	36-5512; 38-94594	<u>2021</u>	None found.
<b>113-12-011-SP006</b>	36-5514; 38-94595	<u>2021</u>	None found.

**W1-11-2670**

<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
<b>113-12-015-SP001</b>	38-88749	<u>2022</u>	None found.
<b>113-12-015-SP002</b>	38-88205	<u>2022</u>	None found.
<b>113-12-015-SP005</b>	38-94550	<u>2022</u>	None found.
<b>113-12-015-SP009</b>	38-88286	<u>2022</u>	None found.

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<b>W1-11-2694</b>			
<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
113-11-003-SP001	38-15228	<u>2019</u>	None found.
113-12-001-SP001	38-18307	<u>2019</u>	None found.
113-12-001-SP002	38-18305	<u>2019</u>	None found.
113-12-001-SP003	38-18304	<u>2019</u>	None found.

<b>W1-11-2696</b>			
<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
113-09-017-SP001	38-67620; 38-88621	<u>2018</u>	None found.
113-09-017-SP002	38-67608; 38-88618	<u>2018</u>	None found.
113-09-017-SP005	38-67615; 38-88620	<u>2018</u>	None found.
113-09-017-SP006	38-67613; 38-88600	<u>2018</u>	None found.
113-09-017-SP007	38-67614; 38-88597	<u>2018</u>	None found.
113-09-017-SP008	38-67607; 38-88599	<u>2018</u>	None found.
113-09-017-SP009	38-88722; 38-94591	<u>2018</u>	None found.
113-09-017-SP010	38-94592	<u>2018</u>	None found.
113-12-003-SP001	38-94586	<u>2018</u>	None found.
113-12-003-SP002	38-67622; 38-88617	<u>2018</u>	None found.
113-12-003-SP003	38-67610; 38-88619	<u>2018</u>	None found.
113-12-003-SP004	38-67619; 38-88598	<u>2018</u>	None found.
113-12-003-SP005	38-67609; 38-88605	<u>2018</u>	None found.
113-12-003-SP006	38-67612; 38-88610	<u>2018</u>	None found.
113-12-003-SP007	38-67611; 38-88604	<u>2018</u>	None found.
113-12-003-SP008	36-19629; 38-67618; 38-88603	<u>2018</u>	None found.
113-12-003-SP009	38-67617; 38-88602; 38-88609	<u>2018</u>	None found.
113-12-003-SP010	38-67621; 38-88608	<u>2018</u>	None found.
113-12-003-SP011	38-22712; 38-94512	<u>2018</u>	None found.
113-12-003-SP012	38-94587	<u>2018</u>	None found.
113-12-003-SP013	38-94588	<u>2018</u>	None found.

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<b>113-12-003-SP014</b>	38-94598	<u>2018</u>	None found.
<b>113-12-003-SP015</b>	38-94599	<u>2018</u>	None found.
<b>113-12-004-SP002</b>	38-67616	<u>2018</u>	None found.
<b>113-12-004-SP003</b>	38-67605	<u>2018</u>	None found.

<b>W1-11-2760</b>			
<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
<b>113-14-004-SP001</b>	38-88411	<u>2021</u>	None found.
<b>113-14-004-SP002</b>	38-88412	<u>2021</u>	None found.
<b>113-14-004-SP003</b>	38-88592	<u>2021</u>	None found.
<b>113-14-004-SP004</b>	38-88415	<u>2021</u>	None found.
<b>113-14-004-SP005</b>	38-88414	<u>2021</u>	None found.
<b>113-14-004-SP006</b>	38-88413	<u>2021</u>	None found.
<b>113-14-004-SP007</b>	38-88652	<u>2021</u>	None found.
<b>113-14-004-SP008</b>	38-88410	<u>2021</u>	None found.
			<u><a href="#">San Carlos Apache Tribe’s Suggested Corrections to Proposed Abstracts for Potential Water Rights 113-14-004-SP009 and 113-14-004-SP020:</a></u>
<b>113-14-004-SP009</b>	38-88408; 38-61454	<u>2021</u>	“The proposed abstract for PWR 113-14-004-SP009 attached to the Special Master’s Order lists filing 38-88408 as the basis of right. The proposed abstract attached to the Special Master’s November 3, 2020 Order, however, also listed filing 38-61454 as a basis of right – a filing also listed in WFR 113-14-004 as associated with SP009...The Tribe suggests that a reference to 38-61454 be added to the abstract as an applicable basis of right.” p. 3, ln. 4-18.
<b>113-14-004-SP012</b>	38-94756	<u>2021</u>	None found.
<b>113-14-004-SP013</b>	38-94757	<u>2021</u>	None found.
<b>113-14-004-SP016</b>	38-22902	<u>2021</u>	None found.
<b>113-14-004-SP017</b>	38-61456; 38-94619	<u>2021</u>	None found.
<b>113-14-004-SP018</b>	38-94755	<u>2021</u>	None found.
<b>113-14-004-SP019</b>	38-94523	cannot locate order	None found.
			<u><a href="#">San Carlos Apache Tribe’s Suggested Corrections to Proposed Abstracts for Potential Water Rights 113-14-004-SP009 and 113-14-004-SP020:</a></u>
<b>113-14-004-SP020</b>	36-100073; 38-61466; 36-22903	<u>2021</u>	The proposed abstract for PWR 113-14-004-SP020...lists filing 36-

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			100073 as the basis of right. The proposed abstract attached to the Special Master’s November 3, 2020 Order, however, also listed filings 38-61466 and 36-22903 as bases of right – filings also listed in WFR 113-14-004 as associated with SP020...The Tribe suggests that references to 38-61466 and 36-22903 be added to the abstract as applicable bases of right.” pp. 3-4, ln. 20-28; 1-6.
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W1-11-2844			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
114-03-005-SP001	38-94290	<u>2024</u>	<p><u>Motion for Approval of Stipulation, Withdrawal of Objections, and Request to Approve Water Right Abstract, filed Feb. 12, 2024:</u> “The Parties have reviewed the proposed water right abstract and map, and the water right filings referred to therein, and do not object to the proposed water right abstract and map.” p.3, ln.2-4.</p> <p><i>Of note is that ADWR filed a <u>Notice of Filing Draft Abstracts on Jan. 5, 2024</u> in which it noted that “ASLD has not taken steps to resolve the duplicate Surface Water applications on file with ADWR for SP001” and “[le]ft blank any attribute fields for which the Court will evaluate the information presented by the parties.” p. 2-3, ln. 9-11, 5-6. The basis of right field was accordingly left blank by ADWR.</i></p>

W1-11-3300			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-05-030-SP001	38-61132	<u>2018</u>	None found.

W1-11-3325			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-05-001-SP002	38-88371	<u>2021</u>	None found.
115-05-001-SP003	38-88370	<u>2021</u>	None found.
115-05-001-SP005	38-94565	<u>2021</u>	None found.
115-05-001-SP006	38-88368	<u>2021</u>	None found.
115-05-001-SP008	38-88374	<u>2021</u>	None found.

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<b>115-05-001-SP009</b>	38-88383	<u>2021</u>	None found.
<b>115-05-001-SP010</b>	38-88656	<u>2021</u>	None found.
<b>115-05-001-SW002</b>	38-5068; 38-5069	<u>2021</u>	None found.
<b>115-05-001-SW005</b>	38-5072	<u>2021</u>	None found.
<b>115-05-001-SW006</b>	38-5073	<u>2021</u>	None found.

<b>W1-11-3326</b>			
<b>PWR #</b>	<b>BOR</b>	<b>Year Approved</b>	<b>Relevant Comments to Abstracts by Objectors</b>
<b>115-05-002-SP001</b>	38-88422	<u>2019</u>	None found.
<b>115-05-002-SP002</b>	38-88435; 3R-2258	<u>2019</u>	None found.
<b>115-05-002-SP003</b>	38-88674	<u>2019</u>	None found.
<b>115-05-002-SP005</b>	38-88813; 3R-2257.1	<u>2019</u>	None found.
<b>115-05-002-SP006</b>	38-88675	<u>2019</u>	None found.
<b>115-05-002-SP007</b>	38-88673	<u>2019</u>	None found.
<b>115-05-002-SP008</b>	38-88457; 38-2554.0001	<u>2019</u>	None found.
<b>115-05-004-SP002</b>	38-25568.1; 38-88424; 38-88454; 38-94529	<u>2019</u>	None found.
<b>115-05-004-SP003</b>	38-25564.1	<u>2019</u>	None found.
<b>115-05-004-SP005</b>	38-25555.1; 38-94530	<u>2019</u>	None found.
<b>115-05-004-SP006</b>	38-25562.1; 38-88453	<u>2019</u>	None found.
<b>115-05-004-SP007</b>	38-25556.1; 38-25569.1; 38-94531	<u>2019</u>	None found.
<b>115-05-022-SP001</b>	38-88420	<u>2019</u>	None found.
<b>115-05-022-SP002</b>	38-25558	<u>2019</u>	None found.
<b>115-05-022-SP003</b>	38-25565	<u>2019</u>	None found.
<b>115-05-022-SP004</b>	38-25557; 38-88455	<u>2019</u>	None found.
<b>115-05-038-SP001</b>	38-25561	<u>2019</u>	None found.
<b>115-05-038-SP002</b>	38-25559	<u>2019</u>	None found.
<b>115-05-038-SP003</b>	38-95737		None found.
<b>115-05-038-SP004</b>	38-25560	<u>2019</u>	None found.
<b>115-05-DB-001-DM001</b>	36-25572; 36-25587; 38-25566; 38-25567;	<u>2019</u>	<a href="#"><u>The San Carlos Apache Tribe and the Tonto Apache Tribe’s Objections to Proposed Abstracts for Irrigation Uses</u></a> : “Filing number 38-0025566 is a claim for a stockpond, not an irrigation right. While the pond is named

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	4A-73; 55-612030; 55-612031		<p>‘Irrigation Tank’ in the Notice of Claim of Water Right for a Stockpond, the claimant also certified in the document that, ‘The stockpond was consutrcted and is used for the purpose of watering livestock or wildlife, including fish.’” p.3, ln.19-22.</p> <p><u><a href="#">The San Carlos Apache Tribe and the Tonto Apache Tribe’s Objections to Proposed Abstracts for Irrigation Uses:</a></u> “Filing number 38-0025567 is a claim for a stockpond, but there are conflicting uses listed in the claim documentation. The applicant certified in the Notice of Claim of Water Right for a Stockpond dated June 26, 1979, that, ‘The stockpond was constructed and is used for the sole purpose of watering livestock or wildlife, including fish.’ In the Claim of Water Right for a Stockpond; Application for Certification filed the same day, the applicant stated that the pond was constructed for the sole purpose of irrigation and watering stock, and also stated the pond was also used for ‘house uses.’” pp. 3-4, ln. 24-27, 1-4.</p>
<b>115-05-DB-001-IR001</b>	0-171; 36-25572; 36-22587; 38-25566; 38-25567; 4A-73; 55-612030; 55-612031	<u>2019</u>	See above re 38-25566 and 38-25567.
<b>115-05-DB-001-IR002</b>	0-171; 36-25572; 36-22587; 38-25566; 38-25567; 4A-73; 55-612030; 55-612031	<u>2019</u>	See above re 38-25566 and 38-25567.
<b>115-05-DB-001-IR003</b>	0-171; 36-25572; 36-22587; 38-25566; 38-25567; 4A-73; 55-612030; 55-612031	<u>2019</u>	See above re 38-25566 and 38-25567.
<b>115-05-DB-001-SR001</b>	0-171; 36-25572; 36-22587; 38-25566; 38-25567; 55-612030; 55-612031	<u>2019</u>	See above re 38-25566 and 38-25567.
<b>115-05-DB-001-SW001</b>	0-171; 36-25572; 36-22587; 38-25566; 38-25567; 4A-73	<u>2019</u>	See above re 38-25566 and 38-25567.

**ATTACHMENT B: Summary of Parties' Relevant Comments Regarding Bases of Rights for 173 Abstracts Already Entered into the Catalog of Proposed Water Rights**

W1-11-3329			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-05-005-SP001	38-61135; 38-88459	<u>2019</u>	None found ( <i>comments filed by SRP were not available in ADWR's Imaged Record Database</i> ).
115-05-005-SP003	33-84222; 38-88458	<u>2019</u>	None found.
115-05-005-SP007	3R-2445; 38-88434	<u>2019</u>	None found.
115-05-005-SP008	3R-2444; 38-88418	<u>2019</u>	None found.
115-05-005-SP011	3R-2443; 38-88423	<u>2019</u>	None found.
115-05-005-SP014	38-61140; 38-88440	<u>2019</u>	None found.
115-05-018-SP004	38-86587; 38-88761	<u>2019</u>	None found.
115-05-018-SP005	36-37269; 38-88772	<u>2019</u>	None found.
115-05-018-SP006	38-94702	<u>2019</u>	None found.
115-05-018-SP007	38-94702	<u>2019</u>	None found.
115-05-018-SP008	38-86585; 38-88545; 3R-1866	<u>2019</u>	None found.
115-05-018-SP009	3R-1867; 38-86584; 38-88421	<u>2019</u>	None found.
115-05-018-SP010	38-88705	<u>2019</u>	None found.
115-05-018-SP011	38-86590; 38-88771	<u>2019</u>	None found.
115-05-018-SP012	38-86593; 38-88399	<u>2019</u>	None found.
115-05-018-SP014	38-86591; 38-88525	<u>2019</u>	None found.
115-05-018-SP015	38-86592; 38-88445	<u>2019</u>	None found.
115-05-018-SP016	38-86586; 38-88532	<u>2019</u>	None found.
115-05-018-SP017	38-86588; 38-88526	<u>2019</u>	None found.
115-05-018-SP018	38-86589; 38-88538	<u>2019</u>	None found.
115-05-018-SW006	36-37268; 38-94702	<u>2019</u>	None found.

W1-11-3338			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-05-015-SP002	38-22891	<u>2020</u>	None found.
115-05-015-SP003	38-22870	<u>2020</u>	None found.
115-05-015-SP004	38-94759	<u>2020</u>	None found.
115-05-015-SP005	38-94518	<u>2020</u>	None found.
115-05-015-SP006	38-94517	<u>2020</u>	None found.

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W1-11-3356			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-05-033-SP001	38-88432	<u>2021</u>	None found.
115-05-033-SP002	38-88429	<u>2021</u>	None found.

W1-11-3372			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-05-053-SP001	38-88428	<u>2022</u>	None found.

W1-11-3403			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-06-001-SP001	38-88671	<u>2022</u>	None found.

W1-11-3407			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-06-005-SP001	38-88433	<u>2021</u>	None found.
115-06-005-SP003	38-88444	<u>2021</u>	None found.

W1-11-3429			
PWR #	BOR	Year Approved	Relevant Comments to Abstracts by Objectors
115-10-001-SP002	38-94568	<u>2021</u>	None found.
115-10-001-SP003	38-88710	<u>2021</u>	None found.
115-10-001-SP005	38-88708	<u>2021</u>	None found.
		<u>2021</u>	Salt River Project’s Suggested Corrections to Proposed Abstracts: “Based upon the location and source of water, it appears that the Basis of Right for this Potential Water Right (‘PWR’) also should include Stockpond Registration Act (‘SPRA’) filing 38-27657. Based upon SPRA filing 38-27657, the Source of Water should be ‘Black Canyon,’ a tributary to Aravaipa Creek.” p.2, ln.8-11.
115-10-001-SP006	38-94534		

**ATTACHMENT B:** Summary of Parties' Relevant Comments Regarding Bases of Rights for 173 Abstracts Already Entered into the Catalog of Proposed Water Rights

		<u>2021</u>	<u>Salt River Project's Suggested Corrections to Proposed Abstracts:</u> "Based upon the location and source of water it appears that the Basis of Right for this PWR should also include SPRA filing 38-27660. Based upon SPRA filings 38-88707 and 38-27660, the Source of Water should be 'KH Canyon,' a tributary to Aravaipa Creek." p.2, ln. 12-15.
<b>115-10-001-SP007</b>	38-27660; 38-88707		
<b>115-10-001-SP009</b>	38-94543	<u>2021</u>	None found.
<b>115-10-001-SP010</b>	38-94573	<u>2021</u>	None found.