

In the Matter of the Application of)
 the City of Oklahoma City for a)
 Regular Permit to Divert Stream)Permit Application No. 2007-0017
 Water in Pushmataha County, Oklahoma)

**POTEAU VALLEY IMPROVEMENT AUTHORITY'S
 RESPONSES TO APPLICANT'S FIRST REQUEST FOR DISCOVERY**

INTERROGATORIES

GENERAL BACKGROUND INFORMATION: State your entity's name, address, telephone number, and, if applicable, e-mail address.

RESPONSE: Poteau Valley Improvement Authority, 25768 U.S. Highway 270, Wister, OK 74966-9124, (918) 655-7500, pvia12@windstream.net.

INTERROGATORY NO. 1: State specific information showing how the permit would directly and adversely affect legally protected interests of your entity. Do not answer on behalf of the entity's individual members; they will have a separate opportunity to respond.

RESPONSE: Sardis Lake is a secondary source of water for the Poteau Valley Improvement Authority and LeFlore County and we have had our engineer study the best method and projected cost to bring water to our treatment plant. It is our concern to legally protect this source which is considered a part of the agreement and pending permit. The Proposal fails to take into account sedimentation of Sardis Lake over a period of time. This is crucial in that Oklahoma City takes water off the top of the lake and due to sediment build up, the bottom water is unprotected. There is no current bathymetric study of the lake concerning sedimentation.

A suggested solution is to make the permit renewable after a seven-ten year period, and have data regarding sedimentation available to make adjustments as necessary to protect the bottom water allocated to the surrounding counties.

A further concern is loss of water at the proposed take out point. This is not an efficient method to obtain water as much of the water flows down the river.

A remedy to this would be to move the take out point to Sardis Lake and thus avoid loss of water due to river run.

INTERROGATORY NO. 2: Does your entity own property in the Kiamichi Rover basin? Please answer "Yes" or "No". Do not answer on behalf of the entity's individual members; they will have a separate opportunity to respond.

RESPONSE: No.

INTERROGATORY NO. 3: If your answer to Interrogatory no. 2 is "Yes," is the entity's property located adjacent to the Kiamichi Rover or its tributaries? Please answer "Yes," "No" or "Not Applicable."

RESPONSE: Not Applicable.

INTERROGATORY NO. 4: If your answer to Interrogatory No. 3 is "Yes", please provide the legal description of the entity's property. If you do not currently have the legal description, please provide us with the address of the property.

RESPONSE: Not Applicable.

INTERROGATORY NO. 5: How many of your members own property adjacent to the Kiamichi River or its tributaries? Please answer "None," "Some," or "All."

RESPONSE: None.

INTERROGATORY NO. 6: Identify any individual who are members of your entity who are also listed as interested persons on the certificate of service below.

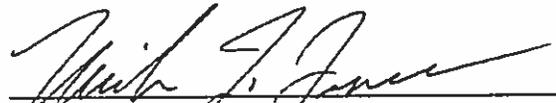
RESPONSE: None.

INTERROGATORY NO. 7: State your entity's purpose.

RESPONSE: Poteau Valley Improvement Authority provides wholesale portable water to sixteen water districts, cities and towns to serve over forty-thousand households and businesses in LeFlore, Haskell and Latimer Counties.

Poteau Valley Improvement Authority reserves the right to supplement these answers up until the deadline of the Permit issue.

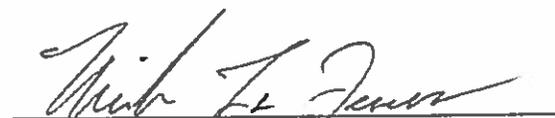
Respectfully submitted,
Poteau Valley Improvement Authority


Mickey LaFavers, Chairman

CERTIFICATE OF SERVICE

This is to certify that on the 11th day of July, 2017, I e-mailed a true and correct copy of the Poteau Valley Improvement Authority's Response to Applicant's First Request for Discovery to:

sbrownhill@rcalaw.com


Mickey LaFavers, Chairman