



United States Department of the Interior
NATIONAL PARK SERVICE
Chickasaw National Recreation Area
1008 W. Second Street
Sulphur, Oklahoma 73086

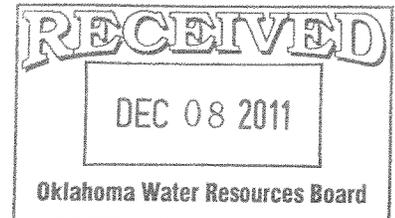


IN REPLY REFER TO:

L54 (CHIC)

December 6, 2011

Ms. Linda Lambert
Chairwoman, Oklahoma Water Resources Board
3800 North Classen Boulevard
Oklahoma City, OK 73118



Re: Support for the Proposed Order Establishing the Tentative Maximum Annual Yield of the Arbuckle-Simpson Aquifer

Dear Chairwoman Lambert:

When Congress established the Sulphur Springs Reservation in 1902, it did so expressly to protect the springs and streams that today lie within Chickasaw National Recreation Area. The vitality of these springs and streams is dependent in large measure on the natural discharge of groundwater from the Arbuckle-Simpson Aquifer. As the steward of these unique groundwater-dependent resources, the National Park Service has actively engaged in efforts to protect the Arbuckle-Simpson Aquifer from unsustainable groundwater development. The "Proposed Order Establishing the Tentative Maximum Annual Yield of the Arbuckle-Simpson Aquifer" represents a significant positive step towards preserving the aquifer's natural discharge and securing the flows of the springs and streams of the Chickasaw National Recreation Area. Although Chickasaw National Recreation Area generally supports the adoption of the "Proposed Order Establishing the Tentative Maximum Annual Yield of the Arbuckle-Simpson Aquifer" by the Oklahoma Water Resources Board, the National Park Service believes that two modifications are necessary.

First, the provision in the Proposed Order (page six) that provides that "wells placed outside the [well] setback area shall be deemed not likely to degrade or interfere with springs emanating in whole or in part from the Arbuckle-Simpson Aquifer" should be modified to make it clear that a well's location outside the well setback area does not establish an absolute presumption of non-injury. Such a modification is necessary due to the complex hydrogeology of the Arbuckle-Simpson Aquifer, whereby because of extensive faulting and fracturing of the geological formations comprising the aquifer, wells located adjacent to such faults and fractures and outside a well setback area could have substantially greater effects on springs than wells that

are located within the well setback area, but are not adjacent to such faults and fractures. Therefore, the National Park Service suggests that the sentence be redrafted to read as follows: "Wells placed outside the setback area shall be presumed not likely to degrade or interfere with springs emanating in whole or in part from the Arbuckle-Simpson Aquifer; however, such presumption may be rebutted by evidence to the contrary."

Second, there is a provision in the Proposed Order (page six) that makes reference to the requirement that all wells located within the well setback area have a "mitigation plan." Another provision of the Proposed Order, which immediately follows the one just cited, requires that whenever a "site-specific management plan" is required, that it be incorporated as a water permit condition. It appears that the "mitigation plan" and the "site-specific management plan" are one and the same and the reference to this plan in the Proposed Order should be changed to "site-specific monitoring, management, and mitigation plan."

With the incorporation of these two suggested minor modifications, Chickasaw National Recreation Area, supports the adoption of the "Proposed Order Establishing the Tentative Maximum Annual Yield of the Arbuckle-Simpson Aquifer" by the Oklahoma Water Resources Board.

Sincerely,



Bruce Noble
Superintendent

cc: J.D. Strong, Executive Director – Oklahoma Water Resources Board
John Wessels, Regional Director – Intermountain Region, National Park Service
Bill Hansen, Branch Chief – Water Rights Branch, National Park Service

