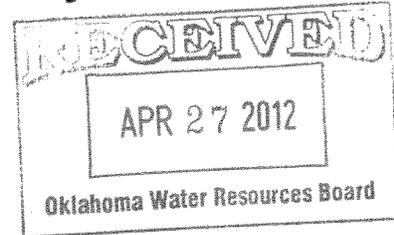


# THE CITY OF DURANT

## Office of the Mayor



April 24, 2012

JD Strong, Executive Director  
Oklahoma Water Resources Board  
3800 North Classen Boulevard  
Oklahoma City OK 73118

*Subject: Support for a reasonable schedule of implementation of an Equal Proportionate Share of 0.2 acre-feet per acre per year in the Arbuckle-Simpson Aquifer*

Dear Director Strong:

The City of Durant, Oklahoma, ranks as one of the fastest growing cities in the nation. Such growth, however, would be impossible without a reliable and continuous source of water — namely, the Blue River, whose headwaters begin over the Arbuckle-Simpson Aquifer. Thus, while not located directly over the Arbuckle-Simpson Aquifer, the Oklahoma Water Resources Board's (*herein "OWRB"*) determination of the Aquifer's Maximum Annual Yield (*herein "MAY"*) nevertheless directly impacts the City of Durant. In addition to over 6,200 residential meters, the City of Durant also supplies nearly 1,200 commercial and industrial users, including a number of rural water districts. Sustainably managing the Arbuckle-Simpson Aquifer is imperative to Durant's continued growth.

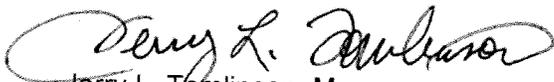
As such, the City of Durant strongly supports the OWRB's proposed MAY of 78,404 acre-feet per year (equivalent to 0.2 acre-feet per acre per year). Some commenters suggest the OWRB set the Aquifer's MAY at the recharge rate. However, data obtained through the OWRB's six year, \$6.5 million peer-reviewed study conclusively establishes that a MAY equivalent to the recharge rate is unsustainable — essentially, a MAY equal to the recharge rate would dry up the springs and streams of the Aquifer, thus threatening the flows relied upon by the City of Durant for municipal use. The City of Durant applauds the OWRB's reliance on scientific evidence when proposing the MAY for the Arbuckle-Simpson Aquifer.

As you know, the City of Durant uses surface flows from the Arbuckle-Simpson Aquifer and thus will not be required to obtain additional water rights, infrastructure, or funds in order to comply with SB288. Nonetheless, Durant advocates on behalf of and along with its fellow water suppliers over the Aquifer for a longer implementation period. Five years is a blink of an eye in municipal planning — particularly with regard to water planning. Indeed, Oklahoma state's own water plan looks fifty years into the future. Many municipalities will require additional infrastructure, which will be an expensive undertaking. Yet, before taxes can be raised and grant applications sent, a municipality must educate its citizenry on the issue.

Currently, only a small fraction of the total proposed MAY is used. Even assuming an EPS of 0.2, estimates indicate that groundwater use will be comfortably below the protective MAY. Accordingly, water suppliers over the Arbuckle-Simpson Aquifer have the ability to carefully and meticulously implement the MAY while still being protective of the Aquifer's overall health and sustainability.

Sustainable management of the Arbuckle-Simpson Aquifer is crucial to the continued economic growth of South-Central Oklahoma. Accordingly, the City of Durant emphatically supports the OWRB's science-based Maximum Annual Yield of 78,404 acre-feet per year and looks forward to a continued working relationship with the Oklahoma Water Resources Board to ensure that the waters of Oklahoma are sustainably managed.

Sincerely,



Jerry L. Tomlinson, Mayor  
City of Durant, Oklahoma

