

SPECIAL IMPROVEMENT DISTRICT NO. 3 OF THE  
RIO GRANDE WATER CONSERVATION DISTRICT

ANNUAL REPLACEMENT PLAN  
2025 PLAN YEAR

Prepared

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By

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**2015CW3024 -- Rules Governing the Withdrawal of Groundwater in Water Division No. 3 (the Rio Grande Basin) and Establishing Criteria for the Beginning and End of the Irrigation Season in Water Division No. 3 for All Irrigation Water Rights**

Rule 11 Subdistrict's Proposed ARP

11.1. By April 15th of each year, a Subdistrict with an approved Groundwater Management Plan must submit to the State and Division Engineers a proposed ARP that includes the following:

11.1.1 A database of all Wells to be covered by the ARP, which will be updated annually. The database of Subdistrict Wells will be provided in hard copy or electronic format, at the reasonable discretion of the State and Division Engineers and will include:

11.1.1.1 The structure identification number (WDID)

11.1.1.2 If no structure identification number has been assigned to a Subdistrict Well, the Subdistrict will furnish the following information: (See language in Rules court document).

11.1.1.3 A separate list of Subdistrict Wells with Plans for Augmentation

11.1.1.4 The total combined projected annual diversion for all Subdistrict Wells

11.1.1.5 The expected method(s) of irrigation, the combined projected number of acres irrigated by Wells included in the ARP, and the total projected acreage by each irrigation method

11.1.1.6 For non-irrigation Subdistrict Wells, a calculation of all projected withdrawals and projected Net Groundwater Consumptive Use

11.1.1.7 Any other data the Subdistrict deems necessary to support its projected Stream Depletions

11.1.1.8 Any other information required by the State and Division Engineers and reasonably necessary to evaluate the proposed ARP

11.1.1.9 Operational Requests to the Division No. 3 Division Engineer for the 2025 ARP

11.1.2 The Subdistrict will submit projected Stream Depletions from the Wells covered by an ARP, in time, location, and amount based on the applicable Response Functions under Rule 7.3, along with the Response Functions or approved alternative methodology that complies with Rules 7.5 and 7.6.

11.1.3 The Subdistrict will submit a detailed description of how Injurious Stream Depletions from groundwater withdrawals by Wells included in the ARP will be replaced or Remedied, including:

11.1.3.1 The source, sufficiency, availability, and amounts of replacement water the Subdistrict will use to replace Injurious Stream Depletions during the term of the ARP and the Subdistrict's plan to replace or Remedy Injurious Stream Depletions occurring after the term of the ARP

11.1.4 The Subdistrict will also list and provide copies of any voluntary contractual arrangements among water users, water user associations, water conservancy districts, Subdistricts, and/or the Rio Grande Water Conservation District pursuant to which:

11.1.4.1 Water is added to the stream system to assist in meeting the Rio Grande Compact delivery schedules

11.1.4.2 Water is added to the stream system to replace or Remedy Injurious Stream Depletions resulting from the use of groundwater

11.1.4.3 Subject to section 37-92-501(4)(a)(I)-(III), C.R.S., injury to senior surface water rights resulting from the use of groundwater is Remedied by means other than by providing water to replace Injurious Stream Depletions

11.1.5 Information to document progress towards achieving and maintaining a Sustainable Water Supply, including:

11.1.5.1 Water levels, pressure levels, and/or groundwater withdrawals as appropriate

11.1.5.2 A listing of any irrigated acres proposed to be fallowed, whether those acres are temporarily or permanently fallowed, and the water rights associated with those proposed fallowed irrigated acres

11.1.5.3 A listing of water rights proposed to be temporarily or permanently retired and historical operations of each water right

11.1.5.4 Other proposed actions to be taken as applicable

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**Abbreviations**

ARP	Annual Replacement Plan
CBP	Closed Basin Project
CWCD	Conejos Water Conservancy District
DWR	State of Colorado, Division of Water Resources
NRCS	Natural Resources Conservation Service
Plan Year	The period May 1, 2025 through April 30, 2026
PWM	Plan of Water Management
Response Functions	RFApplication_C_Conejos_6P98_V1.1
RGDSS	Rio Grande Decision Support System
RGWCD	Rio Grande Water Conservation District
RGWUA	Rio Grande Water User's Association
Rule or Rules	Rules Governing the Withdrawal of Groundwater in Water Division No. 3 (the Rio Grande Basin) and Establishing Criteria for the Beginning and End of the Irrigation Season in Water Division No. 3 for All Irrigation Water Rights (2015CW3024)
SEO	State Engineer's Office
SLVWCD	San Luis Valley Water Conservancy District
Subdistrict No. 3	Special Improvement District No. 3 of the Rio Grande Water Conservation District
Subdistrict Wells	Wells Benefitting Subdistrict No. 3 lands
SWSP	Substitute Water Supply Plan
WDID	Water District Structure Identification Number

## **INTRODUCTION**

The purpose of this report is to satisfy the requirements for an ARP for the Plan Year under the provisions of the PWM for Subdistrict No. 3, approved without objection on August 27, 2018. Further, the ARP has been prepared in accordance with the requirements of the State Engineer and the Rules Governing the Withdrawal of Groundwater in Water Division No. 3 (the Rio Grande Basin) and Establishing Criteria for the Beginning and End of the Irrigation Season in Water Division No. 3 for All Irrigation Water Rights (“Groundwater Rules”).

As required by the Groundwater Rules, this report includes information necessary for the State Engineer and Subdistrict No. 3 staff to project stream depletions attributable to Subdistrict No. 3 Wells and Contract Wells (“ARP Wells”), as those terms are defined in the PWM, and information to assess progress toward other PWM objectives. This ARP includes a series of tables prepared by Subdistrict No. 3 staff utilizing the most current version of the Response Functions to tabulate the location and quantities of stream depletions resulting from Subdistrict No. 3 ARP Well groundwater withdrawals.

This ARP describes a plan to replace or otherwise remedy injurious stream depletions caused by the withdrawal of groundwater from Subdistrict No. 3 ARP Wells and includes details of the portfolio to be used to replace or otherwise remedy those injurious stream depletions as identified by the DWR for the Plan Year.

## **11.1.1 DATABASE OF ALL WELLS TO BE COVERED BY THE ARP**

### **1. STRUCTURE IDENTIFICATION NUMBER (WDID)**

A comprehensive ARP Well List identifies the wells the Subdistrict is including in the ARP (“ARP Wells”) which are permitted to continue operating in accordance with the PWM and the Groundwater Rules. This ARP Well List is necessary for DWR to identify which wells the Subdistrict has included. Further, the ARP Well List is a required input into the RGDSS Groundwater Model and Response Functions.

Appendix A is the most current tabulation of the WDID for each well in the ARP Well List and the groundwater withdrawals of each ARP Well for the previous Water Administration Year. Each year, as Subdistrict Members report information for their farm plans, and as additional data is accumulated from other sources regarding well use and ownership, the ARP Well List will be updated. Any reported changes are incorporated into the ARP Well List, if appropriate. Following the court’s approval of the Subdistrict, wells have been added, replaced or removed from the Subdistrict’s ARP Well List.

Appendix A lists 166 ARP Wells for 2025, the majority included in the Subdistrict by petition when the Subdistrict was formed March 27, 2017. No additional wells have been added to the ARP Well List for 2025. A table with further details each well which has an approved Subdistrict Participation Contract is included as Appendix B.

### **2. OTHER WELL IDENTIFICATION INFORMATION**

The ARP Well List included with this ARP provides a WDID for all wells the Subdistrict has accepted as part of this ARP and, therefore, no additional well identification information is required by Rule 11.1.1.

### **3. SUBDISTRICT WELLS WITH PLANS FOR AUGMENTATION**

Subdistrict No. 3’s ARP Well List includes wells that are either fully or partially augmented by an approved plan for augmentation which is administered separately from Subdistrict No. 3’s PWM. These plans for augmentation typically associate surface rights with these Subdistrict Wells and other non-Subdistrict No. 3 wells to remedy some portion or all of each well’s injurious stream depletions as calculated under that approved augmentation plan. These wells are included in the Subdistrict’s ARP Well List, and if any portion of their legally decreed groundwater withdrawals is not remedied by an individual plan for augmentation, it is subject to Subdistrict No. 3 fees and Subdistrict No. 3 will remedy injurious stream depletions and post-plan injurious stream depletions attributable to the non-augmented portion of a well’s total groundwater withdrawals as part of this ARP.

#### **Conejos Water Conservancy District Augmentation Certificate No. Com0020**

This augmentation certificate provides the participant 9.0 acre-feet of augmentation water annually to replace out-of-priority depletions caused by participant’s water use. The structure is an existing unconfined well, well permit no. 47770-F, WDID 2205184. The structure’s place of

use is large lawn located on a parcel of land in the NW1/4 NE1/4 Section 33, Township 33 North, Range 7 E., N.M.P.M. The structure and water diversions covered by this Agreement and Augmentation Certificate is augmented only for the purpose of supplying irrigation water to a large lawn. Any additional use of this well will require the owner to contract with the Subdistrict or to seek additional water under the CWCD Augmentation Plan. This well’s depletions are fully covered under the approved augmentation plan of the CWCD, Case No. 90CW24 with the source of augmentation water being supplied in time, place and amount as calculated under this augmentation certificate by the Subdistrict’s approved sources of water. Water will be transferred from the Subdistrict to the CWCD pool to cover the timing and amount of these depletions at the beginning of each irrigation season. The pool of water that will supply this augmentation water may vary each year based on the Subdistrict’s available water sources but will never be less than the 9.0 acre-feet required under this augmentation certificate. This well is considered a non-benefitted Subdistrict Well as defined in the Subdistrict’s PWM and it was not included in the calculation of injurious depletions owed by the Subdistrict for the 2025 Plan Year.

Appendix C contains the list of ARP Wells augmented either fully or partially by a plan for augmentation and a map of the lands associated with those plans for augmentation.

**4. TOTAL PROJECTED ANNUAL DIVERSION FOR ALL SUBDISTRICT ARP WELLS**

The 2024 Water Administration Year metered groundwater withdrawals reported to DWR as of April 2, 2025, for all wells included in the ARP Well List are **24,036** acre-feet. Based on projected Subdistrict No. 3 operations, weather predictions and antecedent conditions, it is anticipated the 2025 ARP Well groundwater withdrawals will be **36,500** acre-feet.

**Table 1.1**  
**Historical Subdistrict ARP Well Metered Pumping**  
(units in acre-feet)

2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
31,232	40,698	42,762	33,286	25,743	25,240	21,273	35,761	16,230	34,610	25,910	25,126	26,930	24,036

The projection of 2025 ARP Well groundwater withdrawals was made by reviewing past years with actual stream flows on the Conejos River System most comparable to those being forecast for 2025. ARP Well groundwater withdrawals in those years were also reviewed. The stream flows in 2018 on the Conejos River System are most comparable to the 2025 forecast and, in those year, Subdistrict ARP Wells withdrew 35,761. Using this comparison, the Subdistrict ARP Well groundwater withdrawals in 2025 are projected to be **36,500** acre-feet. The majority of metered groundwater withdrawals in the Plan Year will be used for irrigation through center pivot sprinklers, 58 percent. Approximately 9 percent and 33 percent of groundwater withdrawals will be applied to flood irrigation and other uses, respectively.

**5. EXPECTED METHODS OF IRRIGATION, THE COMBINED PROJECTED NUMBER OF ACRES IRRIGATED AND THE TOTAL PROJECTED ACREAGE BY EACH IRRIGATION METHOD**

It is projected that the vast majority of metered groundwater withdrawals in the Plan Year will be used for irrigation through center pivot sprinklers. Approximately 9 percent and 33 percent of groundwater withdrawals from ARP Wells will be applied to flood irrigation and other uses, respectively.

Wells included in the ARP Well List are projected to irrigate approximately 23,800 acres during the Plan Year. Of the total projected irrigated acres, it is estimated 15,550 acres will be irrigated by center pivot sprinklers and 8,250 acres will be irrigated by flood application in the Conejos Response Area. This estimate is made based on a review of the breakdown of acres within the Conejos Response Area under each irrigation type prepared by DWR for inclusion in the RGDSS Groundwater Model, a review of any changes in irrigation application type from the previous ARP and a review of the wells being included by Participation Contracts.

**6. NON-IRRIGATION SUBDISTRICT WELLS – CALCULATION OF ALL PROJECTED WITHDRAWALS AND PROJECTED NET GROUNDWATER CONSUMPTIVE USE**

Included in the ARP Well List are a number of wells with beneficial uses other than irrigation. The Subdistrict utilized information provided by DWR to calculate the consumptive use rates used in the RGDSS Model to then calculate stream impacts and returns. Beneficial uses include municipal, commercial, industrial and fish propagation. A spreadsheet was prepared by the Subdistrict to calculate the composite Consumptive Use Ratio that is a necessary input in the Response Functions. A spreadsheet of the calculation prepared for use in the 2025 ARP will be submitted with this ARP.

**7. OTHER DATA NECESSARY TO SUPPORT THE PROJECTED STREAM DEPLETIONS**

No additional data is being provided.

**8. OTHER INFORMATION REQUIRED BY THE STATE AND DIVISION ENGINEERS AND REASONABLY NECESSARY TO EVALUATE THE PROPOSED ARP**

The Subdistrict will provide DWR with an electronic copy of the Response Functions used in this ARP at the same time they submit the ARP for review and approval.

Additional supplemental information that is generally used by DWR in their evaluation of the ARP is also being included with the submission. The supplemental information being provided to the State Engineer includes:

1. Resolution from RGWCD approving the Subdistrict 2025 ARP.

2. The list of Subdistrict Wells included in the 2025 ARP in spreadsheet format matching the list presented in Appendix A.
3. Resolution from RGWCD to allow the Subdistrict to allocate Closed Basin Project water in the 2025 ARP.
4. Spreadsheet of the Subdistrict's breakdown of "Other" wells used to calculate the composite Consumptive Use Ratio in the Response Functions.
5. Spreadsheet of the Subdistrict's analysis of forbearance yield and any available supporting documentation

## **9. OPERATIONAL REQUESTS TO THE DIVISION NO. 3 DIVISION ENGINEER FOR THE 2025 ARP**

1. The Subdistrict requests that at times when there is a monthly, negative depletion in a stream reach, the Division No. 3 Division Engineer allow Subdistrict No. 3 to aggregate that negative depletion amount in one reach, either upstream or downstream, against a positive depletion in another reach, when the opportunity exists under the protocol of DWR. Subdistrict No. 3 also anticipates they will make a request the Division No. 3 Division Engineer allow Subdistrict No. 3 to aggregate a monthly, positive depletion with a negative depletion of another Subdistrict to offset the positive daily depletion that Subdistrict No. 3 would otherwise have to replace or remedy when the opportunity exists under the protocol of DWR. A Memorandum of Understanding would be required before this offset could be allowed between subdistricts.
2. The Subdistrict requests that the Division No. 3 Division Engineer allow a portion of the production of the CBP during the non-wintertime months (April-October) be used to offset the Subdistrict's wintertime depletions (November-March). It is anticipated this scenario will only occur when the total depletions for all RGWCD Subdistricts combined in any one or more months during the winter are greater than the production of the CBP in those months. The total CBP allocation approved to cover wintertime depletions for the Subdistrict will not be exceeded.

### **11.1.2 PROJECTED STREAM DEPLETIONS FROM THE WELLS COVERED BY THE ARP BASED ON THE APPLICABLE RESPONSE FUNCTIONS OR APPROVED ALTERNATIVE METHOD**

The purpose of this section is to present the data utilized to project stream depletions to the Conejos River, Alamosa River, and Rio Grande as a result of the groundwater withdrawals from Subdistrict No. 3 ARP Wells for the Plan Year. The Response Function's outputs identify total projected stream depletions for the Plan Year, a breakdown of the monthly stream depletions for the Plan Year for each of the reaches on the Conejos, Alamosa, and Rio Grande rivers and a projection of the Post-Plan Stream Depletions calculated as a result of the predicted Plan Year groundwater withdrawals from Subdistrict No. 3 ARP Wells. Subdistrict No. 3 utilized the current 6P98 Response Functions to calculate projected stream depletions for this ARP.

The Division Engineer’s March 31, 2025, Rio Grande Compact 10-day report included a forecast of 310,000 acre-feet for the flows of the Rio Grande. The NRCS’s April 1, 2025, forecast also projected 310,000 acre-feet for the Rio Grande, 29,000 acre-feet for the Alamosa River, and 87,000 acre-feet for the Conejos River. The NRCS’s April 1, 2025, forecast report was used as a basis for estimating groundwater consumption in Subdistrict No. 3 in the 2025 ARP. From this forecast, an estimate of the total 2025 ARP Well groundwater withdrawals was prepared. This information was utilized in the Response Functions to project stream depletions caused by groundwater withdrawals from Subdistrict ARP Wells for the Plan Year.

## 1. 2025 STREAM FLOW FORECASTS – CONEJOS, RIO GRANDE AND ALAMOSA RIVERS

The NRCS’s April 1, 2025, forecast report that projected the annual flow of the Rio Grande, Alamosa, Conejos, Los Pinos and San Antonio was used to estimate groundwater consumption attributable to ARP Wells based upon hydrologic conditions for the current Plan Year. Data collected from this forecast is included in Table 1.2.

**Table 1.2**  
**Stream Flow Forecasts-Conejos, Rio Grande and Alamosa Rivers**  
**(units in acre-feet)**

<b>Conejos Stream Flow Forecast</b>				
<b>Analysis</b>	<b>Apr-Sept Forecast (acre-feet)</b>	<b>% of Avg.</b>	<b>Estimated Additional (acre-feet)</b>	<b>Annual Estimated Flow (acre-feet)</b>
	(1)	(2)	(3)	
<b>NRCS, 4/1/2025</b>				
Conejos River near Mogote	87,000	52		
Los Pinos River near Ortiz	29,000	48		
San Antonio River at Ortiz	2,000	21		
<b>Total Conejos River System</b>	<b>118,000</b>			
<b>Division Engineer, Ten Day, 3/31/2025</b>				
Conejos River near Mogote	121,000	72		
Los Pinos River near Ortiz	29,000	48		
San Antonio River at Ortiz	3,900	40		
<b>Total Conejos River System</b>	<b>153,900</b>		<b>26,100</b>	<b>180,000</b>
<b>Rio Grande Stream Flow Forecast</b>				
<b>Analysis</b>	<b>Apr-Sept Forecast (acre-feet)</b>	<b>% of Avg.</b>	<b>Estimated Additional (acre-feet)</b>	<b>Annual Estimated Flow (acre-feet)</b>
	(1)	(2)	(3)	
<b>NRCS, 4/1/2025</b>				
	310,000	65		
<b>Division Engineer, Ten Day, 3/31/2025</b>				
	310,000	65	80,000	390,000
<b>Alamosa Stream Flow Forecast</b>				
<b>Analysis</b>	<b>Apr-Sept Forecast (acre-feet)</b>	<b>% of Avg.</b>	<b>Estimated Additional (acre-feet)</b>	<b>Annual Estimated Flow (acre-feet)</b>
<b>NRCS, 4/1/2025</b>				
	29,000	48		

(1) NRCS projected 50% exceedance streamflow at the gaging station

(2) NRCS 30-yr Average Flow: Conejos-168,000, Rio Grande-480,000, Alamosa-61,000, Los Pinos-61,000, San Antonio-9,600

(3) January through March and October through December

A copy of the NRCS April 1, 2025, forecast and the March 31, 2025, Division No. 3 Division Engineer's Rio Grande and Conejos Compact Ten-Day Reports are attached in Appendix D.

## **2. PROJECTED PLAN YEAR STREAM DEPLETIONS**

Subdistrict No. 3 staff utilized the response functions developed for the Conejos Response Area under the RGDSS Groundwater Model Phase 6P98 to predict stream depletions to the affected streams caused by groundwater withdrawals from ARP Wells. For the Plan Year, stream depletions attributable to the groundwater withdrawals from ARP Wells were calculated using these Response Functions.

The Response Functions spreadsheet was built to be used for the whole Response Area. Two instruction sheets were prepared by DWR for additional inputs to the Response Functions when there is a need to use it for individual or group of wells. The instruction sheet, "How to Use the Application Workbook for a Subset (individual/group) of Wells" (9/23/2015), describes how to adjust the spreadsheet inputs to stream reaches that have been modeled with point source returns to streams. The instruction sheet "How to Adjust the Application Workbook for use with a Subset of Wells" (10/15/2015) describes how to use the "Ratio Method" for Response Areas where it is necessary to apply this method. Both instruction sheets are included as Appendix E.

The first step in using the current 6P98 Response Functions is to input data for the whole Response Area, i.e., historical groundwater withdrawals for sprinkler irrigation, flood irrigation, "other" pumping with corresponding "other" consumptive use ratios for the years 2011 through 2024 and predicted values for 2025.

The Subdistrict elected to use the Response Functions spreadsheet for the subset of wells which are included in the ARP Well List. The Conejos Response Area requires adjustments for point source return flows and the stream ratios, as listed below.

- Conejos Response Area: Reach 7 (San Antonio River) from the Town of Antonito.
- Conejos: Reach 1 Calculations Ratio and Reach 6 Calculations Ratio.

Using the whole Response Area results, adjustments are made on appropriate pages of the Response Function spreadsheet. The Subdistrict ARP Wells do include the Town of Antonito point source return flow, therefore, point source return flows were not adjusted in the spreadsheet. Adjustments for the Ratio Method were made for Reach 1: Conejos above Seledonia/Garcia and Reach 6: Alamosa River.

The next step was to calculate stream depletions by updating the Response Functions table contained in Table 2.1 to derive the annual net groundwater consumptive use. The consumptive use ratios for sprinkler and flood irrigation used in the RGDSS Model are standard factors of 83% and 60%, respectively. The consumptive use ratio for "other" wells is specific to the uses of those wells and can vary widely. The "Other Consumptive Use Ratio" for the whole Response Area is a composite derived from the individual well withdrawals and consumptive uses. The

Subdistrict prepared a separate spreadsheet of “other” wells included in the Subdistrict ARP Well List to show the individual well groundwater withdrawals and consumptive use factors used to explain how the composite ratios were determined for the subset of wells represented in Table 2.1 of the ARP.

Historical groundwater withdrawal values for wells included in the ARP Well List were entered in Table 2.1 for years 2011 through 2024. Projected groundwater withdrawal values were used for 2025. The Subdistrict has no Recharge that Offsets Groundwater for calculation of the Net Groundwater Consumptive Use.

Notes at the bottom of Table 2.1 provide a description of the calculations within this table.

**Table 2.1**  
**Estimated Net Groundwater Consumptive Use**  
**(Units in acre-feet)**

Year	ARP Well Groundwater Withdrawals					Recharge that Offsets Groundwater				Net Groundwater Consumptive Use
	Irrigation Pumping to Center Pivots	Irrigation Pumping to Flood Irrigation	Other Pumping	Other Consumptive Use Ratio	Groundwater Consumption	Recharge Source 1	Recharge Source 2	Other Recharge Offsets	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
2011	19,078	2,431	9,724	52.8%	22,423	0	0	0	0	22,423
2012	27,152	2,409	11,137	55.2%	30,129	0	0	0	0	30,129
2013	27,387	3,235	12,140	57.4%	31,647	0	0	0	0	31,647
2014	21,218	2,624	9,444	52.2%	24,116	0	0	0	0	24,116
2015	15,419	2,496	7,828	52.6%	18,416	0	0	0	0	18,416
2016	14,822	1,724	8,694	53.0%	17,942	0	0	0	0	17,942
2017	12,170	2,007	7,096	50.0%	14,854	0	0	0	0	14,854
2018	24,114	2,724	8,923	52.1%	26,296	0	0	0	0	26,296
2019	9,323	1,177	5,730	43.4%	10,933	0	0	0	0	10,933
2020	24,123	1,641	8,845	51.1%	25,528	0	0	0	0	25,528
2021	16,241	1,758	7,910	50.2%	18,504	0	0	0	0	18,504
2022	15,178	2,561	7,388	50.9%	17,892	0	0	0	0	17,892
2023	17,306	2,312	7,312	50.8%	19,463	0	0	0	0	19,463
2024	13,918	2,089	8,029	51.4%	16,936	0	0	0	0	16,936
<b>2025</b>	<b>24,500</b>	<b>3,000</b>	<b>9,000</b>	<b>51.7%</b>	<b>26,788</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>26,788</b>
Avg	18,797	2,279	8,613	51.7%	21,458	0	0	0	0	21,458

Explanation of Columns

- (1) Calendar Year
- (2) Determined from metered groundwater pumping
- (3) Determined from metered groundwater pumping
- (4) Determined from metered groundwater pumping
- (5) Estimated based on operations metered in Col4
- (6) Calculated as  $0.83 \times \text{Col2} + 0.60 \times \text{Col3} + \text{Col4} \times \text{Col5}$   
(0.83 and 0.60 are the consumptive use ratios of total pumping associated with sprinkler and flood irrigation practices, respectively)
- (7) - (9) Not applicable to the Conejos Response Area
- (10) Calculated as  $\text{Col7} + \text{Col8} + \text{Col9}$
- (11) Calculated as  $\text{Col6} - \text{Col10}$

Wells that are added or deleted to the ARP Well List affect historical groundwater withdrawals figures as follows:

- Any wells that are added to the ARP will have their historical groundwater withdrawals included
- Any wells that are deleted from the ARP will have their historical groundwater withdrawals included in the groundwater withdrawals until the year that the wells are deleted
- If any wells that were deleted from a previous ARP list are added back in, any historical groundwater withdrawals from the years they were not included will have to be included in the groundwater withdrawals

The projected Net Groundwater Consumptive Use for the Plan Year is **26,788** acre-feet as shown in Table 2.1.

The Net Groundwater Consumptive Use for 2025 derived in Table 2.1 above is then input into the Response Function table contained in Table 2.2 in Column 3 in the row for 2025 to calculate projected stream depletions for the current Plan Year and into the future. The projected annual stream depletions resulting from the groundwater withdrawals of the wells included in the ARP Well list for the respective reaches and the total are shown in Columns 4 through 7.

**Table 2.2**  
**Estimated Historical and Projected Net Stream Depletions from**  
**Groundwater Withdrawals in Subdistrict No. 3**  
**(Units in acre-feet)**

			Annual Net Stream Depletions (May-Apr) a)							
Year	Conejos River near Mogote (Apr-Sep)	Net Groundwater Consumptive Use (Jan-Dec)	Conejos above Seledonia/Garcia	Conejos below Seledonia/Garcia	Rio Grande Del Norte-Excelsior	Rio Grande Excelsior-Chicago	Rio Grande Chicago-State Line	Alamosa River	San Antonio River	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
1970	201,859	13,588	507	1,087	1	4	61	66	-109	1,617
1971	139,131	17,023	473	1,566	6	19	132	74	-109	2,161
1972	90,563	21,686	355	1,934	15	38	166	80	-108	2,480
1973	262,772	11,216	580	1,482	22	50	188	81	-108	2,295
1974	140,237	17,728	524	1,862	25	50	201	76	-108	2,630
1975	255,598	12,686	571	1,619	28	55	211	79	-108	2,455
1976	174,806	17,309	483	1,908	30	54	219	63	-107	2,650
1977	60,935	22,033	343	2,209	35	63	227	42	-107	2,812
1978	162,145	19,147	552	2,262	41	72	267	80	-107	3,167
1979	288,627	16,911	631	2,163	43	75	278	86	-107	3,169
1980	274,695	19,631	608	2,333	42	71	285	82	-104	3,317
1981	104,316	21,006	374	2,300	43	72	266	84	-96	3,043
1982	279,973	15,418	643	2,085	45	75	281	88	-93	3,124
1983	236,269	14,949	653	1,968	43	69	271	90	-93	3,001
1984	216,888	15,931	646	1,994	40	64	270	89	-89	3,014
1985	337,286	10,755	634	1,579	38	60	250	87	-80	2,568
1986	290,253	9,215	604	1,375	35	53	222	83	-81	2,291
1987	230,225	14,848	573	1,752	33	48	228	80	-79	2,635
1988	139,934	18,422	505	2,043	34	52	255	74	-69	2,894
1989	156,367	21,609	516	2,343	39	64	295	75	-60	3,272
1990	134,969	18,284	519	2,190	44	74	307	74	-54	3,154

1991	215,634	16,760	569	2,113	45	75	302	73	-53	3,124
1992	154,657	17,364	513	2,077	44	71	291	74	-100	2,970
1993	248,449	12,943	577	1,773	44	70	276	79	-162	2,657
1994	211,701	15,006	574	1,852	41	63	263	73	-175	2,691
1995	285,693	11,160	574	1,571	38	58	245	80	-182	2,384
1996	145,438	19,961	542	2,142	37	56	262	78	-182	2,935
1997	243,276	15,390	608	1,960	39	64	278	84	-196	2,837
1998	167,766	19,405	541	2,197	39	64	284	78	-239	2,964
1999	199,120	14,399	559	1,913	41	68	283	63	-262	2,665
2000	102,872	25,453	348	2,487	42	68	271	42	-295	2,963
2001	186,276	21,766	528	2,538	48	80	322	68	-282	3,302
2002	41,441	29,566	353	2,964	55	90	327	33	-199	3,623
2003	113,212	26,346	411	2,888	62	100	339	50	-192	3,658
2004	165,509	21,512	676	2,721	67	104	361	98	-214	3,813
2005	251,583	21,056	782	2,680	67	101	363	108	-209	3,892
2006	148,836	20,620	692	2,579	65	95	351	101	-180	3,703
2007	168,399	19,801	715	2,490	65	95	349	103	-125	3,692
2008	235,334	17,639	808	2,353	63	92	339	111	-95	3,671
2009	204,792	16,020	795	2,173	58	83	318	110	-93	3,444
2010	179,106	20,441	686	2,433	55	78	321	100	-129	3,544
2011	165,835	22,423	649	2,623	58	84	346	101	-106	3,755
2012	113,608	30,129	407	3,076	62	94	347	85	-106	3,965
2013	98,533	31,647	455	3,328	70	106	371	55	-106	4,279
2014	149,340	24,116	713	3,029	76	115	407	104	-106	4,338
2015	155,333	18,416	705	2,512	77	113	385	103	-106	3,789
2016	180,401	17,942	708	2,370	76	106	357	102	-106	3,613
2017	241,792	14,854	743	2,124	72	96	331	109	-106	3,369
2018	106,529	26,296	465	2,681	68	88	310	104	-106	3,610
2019	268,828	10,933	753	1,883	68	90	309	110	-106	3,107
2020	114,509	25,528	452	2,590	65	82	288	103	-106	3,474
2021	150,454	18,504	688	2,388	67	89	325	101	-106	3,552
2022	167,011	17,892	661	2,309	66	90	324	95	-106	3,439
2023	241,561	19,463	700	2,425	64	88	330	97	-106	3,598
2024	161,790	16,936	568	2,182	61	83	317	74	-106	3,179
<b>2025</b>	<b>87,000</b>	<b>26,788</b>	<b>386</b>	<b>2,659</b>	<b>62</b>	<b>86</b>	<b>310</b>	<b>46</b>	<b>-106</b>	<b>3,443</b>
2026			555	963	62	86	258	81	0	2,005
2027			499	547	54	62	168	73	0	1,403
2028			426	405	45	43	120	62	0	1,101
2029			380	294	38	31	93	55	0	891
2030			304	237	32	23	74	44	0	714
2031			245	169	27	18	61	36	0	556
2032			187	116	22	14	51	27	0	417
2033			127	70	18	11	43	18	0	287
2034			65	49	15	8	35	9	0	181
2035			0	34	12	6	30	0	0	82
2036			0	9	10	4	24	0	0	47
2037			0	0	8	3	18	0	0	29
2038			0	0	7	2	13	0	0	22

2039			0	0	5	1	9	0	0	15
2040			0	0	3	0	4	0	0	7
Avg 2001-2015	158,476	22,767	625	2,692	63	95	350	89	-150	3,765
Avg 2001-2010	169,449	21,477	645	2,582	61	92	339	88	-172	3,634
Post Plan			2,788	2,893	358	312	1,001	405	0	7,757

a) Estimated net stream depletions shown in this table are greater than the stream depletions that potentially cause injury to surface water rights.

Explanation of Columns

- (1) Year
- (2) Conejos River near Mogote Gage streamflow in acre-feet for the NRCS streamflow forecast period of April through September. The streamflow value for 2025 is from the March 31, 2025, Division No. 3 Division Engineer’s Rio Grande Compact Ten-Day Report and the NRCS April 1, 2025, forecasts.
- (3) Net Groundwater Consumptive Use (NetGWCU) for January through December. NetGWCU values for 2001 through 2010 were taken from the RGDSS Groundwater Model output. NetGWCU values for 2011 through 2024 were calculated using well meter data. NetGWCU data for 2025 was estimated from prior well meter data and projected diversions based on the projected Conejos River streamflow from the March 31, 2025, Division No. 3 Division Engineer’s Rio Grande Compact Ten-Day Report the NRCS April 1, 2025, forecasts.
- (4) Net Stream Depletions in the Conejos above Seledonia/Garcia reach for the Plan Year (May through April) in ac-ft.
- (5) Net Stream Depletions in the Conejos below Seledonia/Garcia reach for the Plan Year (May through April) in ac-ft.
- (6) Net Stream Depletions in the Rio Grande Del Norte to Excelsior Ditch reach for the Plan Year (May through April) in ac-ft.
- (7) Net Stream Depletions in the Rio Grande Excelsior Ditch to Chicago Ditch reach for the Plan Year (May through April) in ac-ft.
- (8) Net Stream Depletions in the Rio Grande Chicago Ditch to the State Line reach for the Plan Year (May through April) in ac-ft.
- (9) Net Stream Depletions in the Alamosa River for the Plan Year (May through April) in ac-ft.
- (10) Net Stream Depletions in the San Antonio River for the Plan Year (May through April) in ac-ft.
- (11) Total Net Stream Depletions columns (4 + 5 + 6 + 7 + 8 + 9 + 10) in ac-ft.

Table 2.3 is an output from the Response Functions that calculates the annual total stream depletions and monthly replacement obligations for the two reaches of the Conejos River, the Alamosa River, and the three reaches of the Rio Grande. This table lists the Plan Year stream depletions as required under the Groundwater Rules.

**Table 2.3**  
**Subdistrict No. 3 Monthly Stream Depletions for Plan Year**  
**(Units in acre-feet)**

Stream Reach	Conejos Response Area Total												Total
	2025								2026				
	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Conejos above Seledonia/Garcia	42.6	48.0	40.6	27.6	26.7	24.0	21.6	22.0	36.1	30.6	32.7	33.9	386.3
Conejos below Seledonia/Garcia	172.6	232.0	297.1	325.5	315.8	279.6	234.3	206.2	178.2	144.2	145.6	128.1	2,659.1
Rio Grande Del Norte-Excelsior	5.2	5.0	4.9	4.8	4.7	5.0	5.2	5.5	5.6	5.2	5.7	5.4	62.2
Rio Grande Excelsior-Chicago	7.6	6.9	6.8	6.2	6.1	6.5	6.6	7.4	7.8	7.4	8.4	7.9	85.6
Rio Grande Chicago-State Line	32.6	24.1	10.4	9.9	14.4	22.6	33.3	34.9	33.9	30.4	33.2	30.2	309.8

<b>Alamosa River</b>	16.9	7.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	21.6	46.2
<b>San Antonio River</b>	-9.6	-8.9	-10.6	-10.6	-8.0	-7.4	-8.5	-7.9	-7.9	-7.9	-8.5	-9.9	-105.8
<b>Total</b>	267.9	314.6	349.2	363.3	359.6	330.3	292.5	268.0	253.7	209.9	217.2	217.2	<b>3,443.4</b>

Explanation of Columns

- (1) Stream reach
- (2) - (13) Monthly Stream Depletions in acre-feet
- (14) Total Plan Year Stream Depletions in acre-feet

As indicated in the lower right-hand corner of Table 2.3, the Response Functions calculated total stream depletions to the Conejos River, Alamosa River, and Rio Grande during the Plan Year, due to both past ARP Well groundwater withdrawals and the projected Plan Year ARP Well groundwater withdrawals, are **3,443.4** acre-feet. The Response Functions calculated total stream depletions to the Conejos River are **3,045.4** acre-feet, to the Alamosa River **46.2** acre-feet, and to the Rio Grande **457.7** acre-feet. The inclusion of the Town of Antonito’s well in the Subdistrict ARP Well List has produced stream flow returns to the San Antonio River in the amount of **105.8**. The locations of the stream depletions and monthly quantities are also tabulated in Table 2.3.

According to the RGDSS Groundwater Model, if the wells included in the Subdistrict’s ARP Well List were shut off today, there would be a continuing depletion to the river for approximately **19** years. This is the calculated time required to recover to conditions that existed before groundwater withdrawals started. The volume of water required to replace stream depletions during this recovery period is called Post-Plan Stream Depletions. Based on predictions from the Response Functions, Table 2.4 shows there would be a total of **7,792** acre-feet of Post-Plan Stream Depletions. The portion of the total Post-Plan Stream Depletions impacting each of the six designated reaches of the rivers are also included in the table.

**Table 2.4**  
**Subdistrict No. 3 Post-Plan Stream Depletions**  
**(Units in acre-feet)**

Years (May-Apr)	Conejos above Seledonia/ Garcia	Conejos below Seledonia/Garcia	Rio Grande Del Norte-Excelsior	Rio Grande Excelsior- Chicago	Rio Grande Chicago- State Line	Alamosa River	San Antonio River	Total
2026-2045	2,788	2,893	373	312	1,021	405	0	<b>7,792</b>

### **11.1.3 DESCRIPTION OF HOW INJURIOUS STREAM DEPLETIONS FROM GROUNDWATER WITHDRAWALS BY WELLS INCLUDED IN THE ARP WILL BE REPLACED OR REMEDIED**

#### **1. AMOUNTS AND SOURCES OF REPLACEMENT WATER FOR PLAN YEAR**

Table 3.1 shows the amounts and sources of replacement water that will be available to replace injurious stream depletions as directed by the Division Engineer of Water Division No. 3.

**Table 3.1  
Amounts and Sources of Replacement Water Acquired by Subdistrict No. 3**

<b>Conejos River Replacement Sources</b>					
<b>In Storage</b>					
<b>Water Right</b>	<b>Beginning Balance 4/15/2025</b>	<b>Beginning Balance 5/1/2025</b>	<b>Water Previously Controlled By</b>	<b>SWSP</b>	<b>Current Storage Location</b>
Case Nos. 1984CW16 and 1994CW62 (fully consumable water)	721.5	721.5	San Luis Valley Water Conservancy District	6061	Platoro Reservoir
BLM Lovato Ditch Augmentation Water (Case No. 2002CW38A)	14.1	14.1	Bureau of Land Management	6056	Platoro Reservoir
Taos Valley No. 3	67.5	41.0	San Luis Valley Irrigation Well Owners, Inc.	6074	Platoro Reservoir
Alpha Hay Farms SWSP	1,089.3	1,089.3	Alpha Hay Farms	9364	Platoro Reservoir
Conejos Water Conservancy District's Heads Mill and Irrigation Ditch "Project Water"	28.9	28.9	Conejos Water Conservancy District	TBD	Platoro Reservoir
Taos Valley No. 3	86.3	86.3	San Luis Valley Irrigation Well Owners	6093	Platoro Reservoir
<b>In Storage (acre-feet)</b>		<b>1,981.1</b>			
<b>On Call-Irrigation Season</b>					
<b>Water Right</b>	<b>Expected Yield</b>	<b>Source of Diversion</b>	<b>SWSP</b>	<b>Current Storage Location</b>	<b>Contract Limitations</b>
Taos Valley No. 3	1,000	San Antonio River	6093		Lease is limited to 1,000 ac-ft
Alpha Hay Farms SWSP - Heads Mill, J.F. Chacon 2, and Well No. 1 (W-0490)	522.9	Conejos River, and Well No. 1, W-0490	9364		SD 3 will only use this water under an approved SWSP
BLM Lovato Ditch Augmentation Water (Case No. 2002CW38A)	900.0	Rio San Antonio	SWSP will be filed prior to use	Platoro Reservoir	Lease is limited to 900 ac-ft
Los Sauces Ditch Shareholders	0.0	Conejos River	TBD	n/a	
<b>On Call Water-Irrigation Season</b>	<b>2,422.9</b>				
<b>On Call-Irrigation Season</b>					
<b>Forbearance Agreements</b>	<b>Agreement Limits (1)</b>	<b>Expected Yield</b>	<b>Source of Diversion</b>	<b>WDID</b>	<b>Special Conditions</b>
AD Archuleta	No limit		Conejos River	2200500	
Alamo Ditch	No limit		Conejos River	2200501	
AnCon Ditch	No limit		Conejos River	2200504	
Angustura Ditch	No Limit		Conejos River	2200503	
Antonito Ditch	No Limit		Conejos River	2200502	
Balls Bros 1 and 2 Ditch	No limit		Conejos River	2200509, 2200510	Have to forbear

Bernardo Romero	No Limit		Conejos River	2200513	
Branch Ditch	No limit		Conejos River	2200518	
Canon Irrigating Ditch	No limit		Conejos River	2200524	
Cordova Ditch	No limit		Conejos River	2200531	
Del Puerticito	No limit		Conejos River	2200534	
East Bend Ditch_BLM	No limit		Conejos River	2200535	
El Cerrito	No limit		Conejos River	2200539	
Ephraim Canal	No limit		Conejos River	2200541	
Espinosa Springs Ditch	No Limit		Conejos River	2200542	
Fuerticitos Ditch	No Limit		Conejos River	2200547	
Gabriel Martinez Ditch	No limit		Conejos River	2200548	
Guadalupe and Brazos Del Norte Ditches	No limit		Conejos River	2200553. 2200519	
Heads Mill and Irrigation Ditch_Quinlan	No Limit		Conejos River	2200554	
Home Ditch	No limit		Conejos River	2200555	
JF Chacon No. 2 Ditch	No limit		Conejos River	2200561	
JF Chacon No. 3 Ditch	No Limit		Conejos River	2200562	
La Del Rio Ditch	No limit		Conejos River	2200576	
Lopez Ditch	No limit		Conejos River	2200583	
Los Ojos No. 1 Ditch_BLM	No limit		Conejos River	2200584	
Los Ojos No. 2 Ditch_BLM	No limit		Conejos River	2200585	
Los Sauces Ditch	No limit		Conejos River	2200587	Have to forbear
Manassa Land and Irrigation Company	No limit		Conejos River	2200593, 2200595, 2200596	
Martinez Ditch	No Limit		Conejos River	220598	
Mecitos Ditch	No Limit		Conejos River	2200604	
Mill Ditch	No limit		Conejos River	2200605	
Mogote Ditch	No limit		Conejos River	2200591	
New J B Romero Ditch	No Limit		Conejos River	2200608	
Northeastern Consolidated Ditch	No limit		Conejos River	2200609	
Overflow Ditch	No limit		Conejos River	2200611	
Richfield Canal	No limit		Conejos River	2200616	
Romero Ditch	No limit		Conejos River	2200619	
Sabine School Section Ditch	No limit		Conejos River	2200620	
Salazar Ditch	No limit		Conejos River	2200621	
San Juan San Rafael Ditch	No limit		Conejos River	2200624	
San Rafael Conejos Ditch	No limit		Conejos River	2200625	
Sanford Canal	No limit		Conejos River	2200627	
Servietta Ditch	No limit		Conejos River	2200631	
Stover Ditch	No Limit		Conejos River	2200636	
William Stuart Company Irrigation Ditch	No limit		Conejos River	2200651	Have to forbear
Broyles Overflow No. 4 Ditch	No limit		Rio San Antonio	2200664	
Eight Mile Ditch	No limit		Rio San Antonio	2200537	

Florida Ditch	No limit		Rio San Antonio	2200543	
Galvis Ditch	No limit		Rio San Antonio	2200549	
Jaramillo Overflow No 2 Ditch	No limit		Rio San Antonio	2200570	
Lovato Irrigation Ditch	No limit		Rio San Antonio	2200589	
Maes Ditch	No Limit		Rio San Antonio	2200590	
Martinez Ditch	No limit		Rio San Antonio	2200597	
Punche Ditch	No limit		Rio San Antonio	2200615	
Riedel Ditch	No limit		Rio San Antonio	2200617	
Rincones Ditch	No limit		Rio San Antonio	2200618	
Sinecero Ditch	No limit		Rio San Antonio	2200632	
Sisneros Ditch	No limit		Rio San Antonio	2200633	
Star Ditch	No limit		Rio San Antonio	2200635	
Taos Valley Canal No. 3	No Limit		Rio San Antonio	2200639	
Teodoro No. 1 Ditch	No limit		Rio San Antonio	2200640	
Llano Ditch	No Limit		Rio De Los Pinos	2200580	
Los Pinos Ditch	No Limit		Rio De Los Pinos	2200586	
<b>On Call Water-Irrigation Season*</b>		<b>1,774</b>			

\*Description of how the amount for Expected Yield was calculated is in Section 3 below

<b>On Call-Non-Irrigation Season</b>					
<b>Water Right</b>	<b>Total RG Allocation (all SDs)</b>	<b>Expected Yield Subdistrict 3</b>	<b>Water Previously Controlled By</b>	<b>Attributable to Depletions On</b>	<b>Current Location</b>
Closed Basin Project Production	3,040	1,010.7	RGWCD	Conejos	Closed Basin Project
<b>On Call Agreements Non-Irrigation Season</b>		<b>1,010.7</b>			

<b>Rio Grande River Replacement Sources</b>					
<b>In Storage</b>					
<b>Water Right</b>	<b>Beginning Balance 4/15/2025</b>	<b>Beginning Balance 5/1/2025</b>	<b>Water Previously Controlled By</b>	<b>SWSP</b>	<b>Current Storage Location</b>
SD 1 Santa Maria Shares (165 shares leased from the MVC in 2011 at a yield of 0.9233 af/share)	152.3	152.3	SD No. 1	n/a	Continental Reservoir Continental
SD 1 Santa Maria Shares (shares leased in the past from RGC)	47.7	47.7	SD No. 1	n/a	Continental Reservoir
City of Creede excess augmentation credits under Case No. 94CW31 and No. 07CW60	4.5	4.5	Rio Grande Water Conservation District	6094	Beaver Reservoir
Case Nos. 1984CW16 and 1994CW62 (fully consumable water) (from RGWCD)	40.9	40.9	San Luis Valley Water Conservancy District	6182	Rio Grande Reservoir
Taos Valley No. 3	15.0	7.0	SLVIWO, Inc.	6074	Beaver Reservoir
Taos Valley No. 3	445.1	445.1	SLVIWO, Inc.	6074	Rio Grande Reservoir

Case Nos. 1984CW16, and 1994CW62	21.5	21.5	Rosalind L. Weaver	Pending SWSP Approval	Rio Grande Reservoir
<b>In Storage (acre-feet)</b>		<b>719.0</b>			
<b>On Call-Irrigation Season</b>					
<b>Water Right</b>	<b>Expected Yield</b>	<b>Source of Diversion</b>	<b>SWSP</b>	<b>Current Storage Location</b>	<b>Contract Limitations</b>
Los Sauces Ditch Shareholders	221.5	Conejos River	TBD	n/a	
<b>On Call Water-Irrigation Season</b>	<b>221.5</b>				
<b>On Call-Irrigation Season</b>					
<b>Forbearance Agreements</b>	<b>Agreement Limits (1)</b>	<b>Expected Yield</b>	<b>Source of Diversion</b>	<b>WDID</b>	<b>Special Conditions</b>
Centennial Ditch	No Limit		Rio Grande	2000566	When in Priority 32, Ditch Superintendent can request wet water instead of forbearance with a 24-hr. notice
Commonwealth-Empire Canal	500		Rio Grande	2000623	
Excelsior Ditch	No Limit		Rio Grande	2000627	
Monte Vista Canal	300		Rio Grande	2000753	
Rio Grande Canal, RGWUA	150		Rio Grande	2000812, 2000662, 2001094, 2001007, 2000624	Partial forbearance on Priority 178, 197 and 198 as calculated in agreement
Rio Grande Canal, Ellithorpe	No limit		Rio Grande	2001094, 2000624	Partial forbearance on priorities 178 and 198
Rio Grande Canal, Kruse	No limit		Rio Grande	2000624	Partial forbearance on priorities 178 and 198
Rio Grande Canal, Toews	No limit		Rio Grande	2000624	Partial forbearance on priorities 198
Rio Grande Lariat Ditch	500		Rio Grande	2000816	
Rio Grande Piedra Valley Ditch	No Limit		Rio Grande	2000811	
Rio Grande San Luis Ditch	No Limit		Rio Grande	2000817	
Farmer's Union Canal	500		Rio Grande	2000631	
<b>On Call Water-Irrigation Season *</b>		<b>176</b>			
<b>*Description of how the amount for Expected Yield was calculated is in Section 3 below</b>					
<b>On Call-Non-Irrigation Season</b>					
<b>Water Right</b>	<b>Total RG Allocation (all SDs)</b>	<b>Expected Yield Subdistrict</b>	<b>Water Previously Controlled By</b>	<b>Attributable to Depletions On</b>	<b>Current Location</b>
Closed Basin Project Production	4,560	230.5	RGWCD	Rio Grande	Closed Basin Project

<b>On Call Agreements Non-Irrigation Season</b>		230.5			
<b>Alamosa River Replacement Sources</b>					
<b>In Storage</b>					
<b>Water Right</b>	<b>Beginning Balance 4/15/2025</b>	<b>Beginning Balance 5/1/2025</b>	<b>Water Previously Controlled By</b>	<b>SWSP</b>	<b>Current Storage Location</b>
Expo, LLC Augmentation Water (Case No. 2014CW3027 and Case No. 2016CW3019)	35.1	31.8	EXPO, LLC	6066	Terrace Reservoir
Terrace Irrigation Company Excess Augmentation Credits 2024 (Case No. 1982CW97)	23.85	23.9	Terrace Irrigation Company	SWSP TBD	Terrace Reservoir
<b>In Storage (acre-feet)</b>		<b>55.7</b>			
<b>On Call-Irrigation Season</b>					
<b>Forbearance Agreements</b>	<b>Agreement Limits (1)</b>	<b>Expected Yield</b>	<b>Source of Diversion</b>	<b>WDID</b>	<b>Special Conditions</b>
Alamosa Spring Creek Ditch	No Limit		Alamosa River	2100505	
Arroya Ditch	No Limit		Alamosa River	2100506	
Capulin Ditch	No Limit		Alamosa River	2100510	
Cottonwood Ditch	No Limit		Alamosa River	2100513	
Cristobal Rivera	No Limit		Alamosa River	2100514	
El Viejo	No Limit		Alamosa River	2100520	
Empire Canal	No Limit		Alamosa River	2100522	
Flintham Ditch	No Limit		Alamosa River	2100525	
Gallegos D 3	No Limit		Alamosa River	2100529	
Gabino Gallegos Ditch	No Limit		Alamosa River	2100526	
Garcia No. 2 Ditch	No Limit		Alamosa River	2100532	
Head Overflow No. 5 Ditch	No Limit		Alamosa River	2100539	
Lowland Overflow Ditch Company	No Limit		Alamosa River	2100558 2100575	
Miller Ditch	No Limit		Alamosa River	2100561	
Morganville	No Limit		Alamosa River	2100564	
Norland Ditch	No Limit		Alamosa River	2100570	
North Alamosa Ditch	No Limit		Alamosa River	2100571	
Ortiz Ditch	No Limit		Alamosa River	2100572	
Ramona Ditch	No Limit		Alamosa River	2100581	
San Jose Ditch No. 1	No Limit		Alamosa River	2100591	
Scandinavian Canal	No Limit		Alamosa River	2100593	
Terrace Irrigation Company	100 AF		Alamosa River	2100503, 2100601	
TK Walsh Ditch	No Limit		Alamosa River	2100600	
Union Ditch	No Limit		Alamosa River	2100602	
<b>On Call Water-Irrigation Season*</b>		<b>41</b>			
<b>*Description of how the amount for Expected Yield was calculated is in Section 3 below</b>					
(1) The forbearance agreements limits listed here are written into agreements for each SD individually (para. 2.1 and 2.3 of the agreement)					

## 2. AFTER ACQUIRED SOURCES OF REMEDY

Although Subdistrict No. 3 acknowledges that DWR cannot consider sources or remedy acquired after the submission of this ARP in evaluating the adequacy of the ARP, the Subdistrict will continue to work to acquire additional sources of remedy and/or Forbearance Agreements, and may, with approval from the Division Engineer, use those sources to remedy injury under this ARP.

### **3. OPERATION OF THE 2025 ANNUAL REPLACEMENT PLAN**

The Subdistrict's acquired replacement sources listed in Table 3.1 may require DWR approval for use as replacement water during the ARP Year. SWSPs have been filed for all sources for which it was required that the Subdistrict has acquired and plans to utilize during this ARP Year. The majority of these sources are renewals of previous SWSPs. Table 3.1 provides more detail on the date the SWSP was filed and the expected date the water will be available to the Subdistrict as a replacement source. The Subdistrict understands they will not be allowed to use those sources with pending SWSPs until the State has officially approved them. The Subdistrict has forbearance and other approved sources of water that are sufficient to remedy all sources until the approvals for these additional sources are received.

The Subdistrict's replacement water, identified in Table 3.1, will be released from Platoro Reservoir, located in the Upper Conejos, Terrace Reservoir, located on the Alamosa River, and Rio Grande, Santa Maria, Continental Reservoirs, and Beaver Park Reservoir, located in the Upper Rio Grande, at the direction of the Division 3 Engineer, to offset injurious stream depletions on the respective rivers during the Plan Year. All Plan Year injurious stream depletions will be replaced in the time, location and amount that they occur, beginning May 1, 2025. These releases of water will be performed under the provisions contained in section 37-87-103, C.R.S.

Sections 37-80-120, 37-83-104, and 37-83-106, C.R.S., allow for exchanges to occur between reservoirs without a decree and if recognized by the Division Engineer. Appropriate accounting between the Division Engineer's Office and Subdistrict No. 3 will occur on a regular and routine basis if these exchanges do occur. Any reservoir exchanges done in the Plan Year will be documented and reported in the 2025 Annual Report. The Division Engineer's Office will be notified in advance of any reservoir exchanges.

As shown in Table 3.1 above, Subdistrict No. 3 has implemented Forbearance Agreements with a number of ditches located on the Conejos River, on the San Antonio River, on the Los Pinos River, on the Alamosa River, and on the Rio Grande for the Plan Year. In its sole discretion, the Subdistrict will exercise these agreements, with the exception of those agreements that require the Subdistrict must forbear if the Ditch is the calling right. Reviewing diversion records from prior years of similar hydrologic conditions, as predicted for 2025 on the Conejos River, Alamosa River, and Rio Grande, Subdistrict No. 3 staff determined that these agreements could save an estimated **1,990** acre-feet of replacement water during the Plan Year.

The majority of the forbearance agreements may be operated at the discretion of the Subdistrict. The projected acre-feet of forbearance included in Table 3.1 above for the Rio Grande and the

Alamosa is based on an analysis of the number of days ditches with forbearance were the calling rights in years of similar hydrologic conditions as those predicted for 2025. The years used for the analysis for the Rio Grande were 2013, 2018, and 2020. The years used for the analysis on the Alamosa were 2018 and 2020. The number of days the forbearance ditches were the calling right each month in these years was then multiplied by the average daily acre-feet of injurious stream depletions for each month for the Plan Year, excluding months outside the irrigation season, to determine the total projected yield for all forbearance agreements combined. These expected yields listed in Table 3.1 are not intended to be a limit to the number of acre-feet of injurious stream depletions that can be remedied through forbearance, but rather a conservative estimate of their potential yield to show the Subdistrict's ability to remedy injurious stream depletions. The Subdistrict analysis showed a range on the Rio Grande of between 149 and 217 acre-feet in forbearance on the which could be used by the Subdistrict for replacements in the Plan Year. This estimate did not include days that "special water" priorities in the Rio Grande Canal were the calling rights even though all or a portion of those rights are included in forbearance agreements with the Subdistrict for the Plan Year and may be utilized at the discretion of the Subdistrict. The Subdistrict analysis showed a range on the Alamosa of between 36 and 45 acre-feet in forbearance on the which could be used by the Subdistrict for replacements in the Plan Year.

For the Conejos, it is much more difficult to determine which forbearance ditches may be calling and at which times of the year they will be calling. Also, it is difficult to predict when during the summer months the stream will dry up at the top of Stream Reach 2. Based on the historical records available, the historic calls have not been tracked in a similar manner to the other 2 rivers to allow an analysis such as the one done for the Rio Grande and the Alamosa. To project the Conejos forbearance potential, the Subdistrict used call records from 2018. The justification for this comparison between 2018 and 2025 is the soil moisture conditions, streamflow conditions, and long-range temperature outlook are projected to be very similar. The Subdistrict has confidence this is a reasonable way to project the amount of forbearance the Subdistrict anticipates they could conservatively expect to use for the 2025 Plan Year. For these reasons, the Subdistrict believes it is reasonable to estimate 2025 forbearance will look much like 2018 in terms of acre-feet forbore on the Conejos River.

After submittal of this ARP, Subdistrict No. 3 staff will work with DWR to establish an understanding as to the hierarchy for the use of individual sources of remedy by stream.

As specified in this ARP, several ditches within Stream Reaches 1 and 2 on the Conejos River, the Alamosa River, the San Antonio River, the Los Pinos River and eight ditches within Stream Reaches 1 and 2 on the Rio Grande have entered into forbearance agreements with Subdistrict No. 3 to remedy injurious stream depletions during the Plan Year, if needed. Some of these same ditches may be approached to consider long-term or permanent forbearance agreements for the future.

At times when the Conejos, the San Antonio and the Los Pinos are connected, the calling right can be on the San Antonio or the Los Pinos. When these conditions exist, the injury can occur on the San Antonio or the Los Pinos and forbearance agreements may be utilized to remedy the injurious stream depletions. The projected acre-feet of forbearance are based on an analysis of

the number of days each ditch was the calling right in years of similar hydrologic conditions as those predicted in 2025. The average number of days each ditch was estimated to the calling right was then multiplied by the average daily acre-feet of injurious stream depletions during the Plan Year, excluding months outside the irrigation season. These expected yields are not a limit to the number of acre-feet of injurious stream depletions that can be remedied through forbearance, but a conservative estimate of their potential yield to show the Subdistrict's ability to remedy injurious stream depletions.

Water released to the river for replacement of injurious stream depletions below the Excelsior Ditch, at times when the Rio Grande is dry at that headgate, will be carried around that dry reach through the Centennial Ditch. Those flows will be measured and delivered directly to the Rio Grande at a point approximately ½ mile east of Alamosa CR 105 at the point the Centennial Ditch can return water directly in the Rio Grande. That point is above any water right that may be injured while in priority. The Costilla Ditch is the only structure and water right in this intervening reach of the river and under most conditions, when the Costilla Ditch is in priority (No. 293), there will be water flowing in this reach to serve other downstream senior diverters and the Rio Grande Compact deliveries. In the event the Costilla Ditch is entitled to water in priority and there is no flow at their headgate due to stream depletions from Subdistrict No. 3 groundwater withdrawals, adequate water will be released to replace the injurious stream depletion amount to that stream reach. The Centennial Ditch must be adequate to efficiently deliver water around the dry stretch of river to the satisfaction of the Division Engineer prior to being considered a viable option. The Centennial Ditch Company's water rights are senior enough to accomplish this carriage in any foreseeable situation (Priority Nos. 32 and 173). The agreement to carry that water with the Centennial Ditch Company is attached as Appendix I.

The Response Functions did not predict stream depletions caused by the withdrawal of groundwater by ARP Wells to streams other than the Conejos River, Alamosa River, and the Rio Grande in amounts above the minimum threshold to reliably predict injury. Therefore, Subdistrict No. 3 is not required to make replacements to any stream other than the Conejos, Alamosa, and Rio Grande.

At times when there is no requirement to deliver water to the Lobatos Gage to meet the requirements of the Rio Grande Compact, Subdistrict No. 3 may submit a request to the DWR to allow the injurious stream depletions to the lower reach of the Rio Grande to be replaced after the irrigation season or when compact deliveries are being made. The only instances where Subdistrict No. 3 would not be required to replace these injurious stream depletions are when there is an excess of 150,000 acre-feet of credit for Colorado or Elephant Butte Reservoir has spilled as any additional water passing the Lobatos Gage will not result in a compact credit to Colorado. The CBP may continue to deliver salvaged water to the stream as directed by the CBP Operating Committee or other laws and policies.

The Groundwater Rules require remedies sufficient to also remedy total Post-Plan Stream Depletions caused by current and past years' ARP Wells groundwater withdrawals that deplete the streams after the term of this ARP. Subdistrict No. 3 will continue to work diligently towards obtaining permanent and/or renewable supplies to remedy future injurious stream depletions caused by present or future groundwater withdrawals by Subdistrict ARP Wells.

The Response Functions utilized in the ARP demonstrate that post-plan impacts from past and present groundwater withdrawals by ARP Wells will fluctuate depending on climatic conditions effecting river flows on the Rio Grande, Alamosa, and Conejos Rivers. Section 4.1.5 of Subdistrict No. 3's PWM includes the provision, "the Subdistrict may continue to assess fees until all Post-Plan Injurious Stream Depletions caused by past groundwater withdrawals from Subdistrict Wells have been remedied." This allows Subdistrict No. 3 to provide a financial guarantee to assure that all Post-Plan Injurious Stream Depletions will be replaced or otherwise remedied if Subdistrict No. 3 were to fail or otherwise not be allowed to continue groundwater withdrawals. Subdistrict No. 3 will continue to acquire replacement water for replacing current injurious stream depletions to the impacted streams and also for Post-Plan Injurious Stream Depletions as calculated by the RGDSS Groundwater Model and deemed necessary by DWR and other long-term or permanent remedies, as appropriate.

If Subdistrict No. 3 were to fail, the individual well owners in Subdistrict No. 3 would have to obtain plans for augmentation or take other measures to comply with the Groundwater Rules. Presumably, those plans would be required to replace these Post-Plan Injurious Stream Depletions into the future. In the interim, Subdistrict No. 3 or the Rio Grande Water Conservation District will remedy those Post-Plan Injurious Stream Depletions by supplying water or through agreements of the type contemplated by section 37-92- 501(4)(b)(I)(B), C.R.S., pursuant to which injury to water rights is remedied by means other than providing water to replace stream depletions.

Before March 1, 2026, in accordance with Rule 12.1, Subdistrict No. 3 will recalculate the injurious stream depletions for the Plan Year using the actual stream flows from April 1- September 30, 2025, and actual metered groundwater withdrawals reported to DWR for the prior Water Administration Year. An analysis will be prepared on a daily basis and by stream reach to calculate any differences between the stream depletions projected in the ARP and the stream depletions calculated with the actual data. If Subdistrict No. 3 has underpaid depletions and an opportunity exists to cover all or a portion of this underpayment by aggregating their underpayment with the overpayment of depletions by another subdistrict, a request to allow this aggregation will be made to the Division No. 3 Division Engineer. Subdistrict No. 3 would also make a request to allow any overpayment of depletions they may have to be aggregated with the underpayment of depletions by another Subdistrict.

#### **4. ANTICIPATED FUNDING FOR PLAN YEAR**

Subdistrict No. 3 has approved the creation of a Water Activity Enterprise. The Subdistrict assesses three separate fees to those Subdistrict ARP Well owners that are benefited from the activities of Subdistrict No. 3. These fees are as follows:

- a. Administrative Fee: This fee is assessed to offset the cost of administering the PWM and ARP.
- b. Groundwater Withdrawal Fee: This fee is assessed in two parts per acre-foot of groundwater withdrawn from ARP Wells. This fee is set every year by the Board

of Managers in an amount necessary to purchase replacement water or other sources of replacement to offset injury to those senior water rights caused by Subdistrict No. 3 ARP Wells groundwater withdrawals, to fund programs to comply with the sustainable water supply requirements of the Groundwater Rules, and to fund additional programs Subdistrict No. 3 may deem necessary to meet its goals and objectives.

The fees are set by the Board of Managers and certified in December of each year to Alamosa, Conejos and Rio Grande County treasurers to be included on their tax rolls. The county treasurers collect these fees and remit them to the Subdistrict on a monthly basis in the following calendar year.

For 2024, the Groundwater Withdrawal Fee for every acre-foot of groundwater withdrawn by ARP Wells for sprinkler application was assessed \$27.06 and every acre-foot of groundwater withdrawn by ARP Wells for flood application was assessed \$22.06. ARP Wells that are used for commercial, industrial, municipal and fish propagation applications were assessed a variable Groundwater Withdrawal Fee in the range of \$12.93 to \$30.75 per acre-foot. For 2024, the Administrative Fee was set at \$418.00 per in-active well and \$836.00 per active well (or meter when multiple wells are combined through a single meter). The total 2024 Subdistrict No. 3 assessments which were placed on the tax rolls in 2024 to be collected in 2025 are:

**Table 4.1  
Subdistrict No. 3 Assessments to Fund ARP Operations**

Fee Type	Amount of 2024 Assessments
Administrative Fees	\$124,039.11
Groundwater Withdrawal Fees	\$637,614.40

**11.1.4 CONTRACTUAL ARRANGEMENTS AMONG WATER USERS, WATER USER ASSOCIATIONS, WATER CONSERVANCY DISTRICTS, SUBDISTRICTS, AND/OR THE RIO GRANDE WATER CONSERVATION DISTRICT**

**1. LEASE OF LOS SAUCES DITCH SHARES FROM LOS SAUCES DITCH SHAREHOLDERS AND THE FALLOW OF HISTORICALLY IRRIGATED ACRES**

For the 2025 Plan Year, Subdistrict No. 3, in conjunction with Subdistrict No. 6 and the Trinchera Subdistrict, have leased 14.59 of Los Sauces Ditch shares from and entered into Lease Fallow agreements with two Los Sauces Ditch shareholders for the purpose of drying up approximately 399.44 acres, west of Highway 28, from the Los Sauces Ditch. The Los Sauces Ditch owns 100% of Priority 32, 88.43 cfs in total. The Subdistricts will use the historical consumptive use credits from this dry-up under their respective approved ARPs to supply water to remedy injurious depletions in time, location, or amount, through an administrative exchange, either directly or after storage in a reservoir for release later in the same irrigation season or in a subsequent irrigation season, and/or lease said credits to another subdistrict for the same purpose.

The average annual historical consumptive use for the subject 14.59 shares is 664.5 acre-feet per year. The actual amount of consumptive use may vary based on the hydrological conditions but the intent of the Subdistricts is to split the total consumptive use equally amongst themselves. This means that, on average, Subdistrict No. 3 is entitled to 221.5 acre-feet of consumptive use.

A SWSP was submitted to DWR on December 30, 2024, requesting that the subject 14.59 shares be changed to include, in addition to irrigation, the beneficial uses of augmentation and replacement, including remedy of injurious depletions under an approved ARP, whether directly, by exchange, and storage by exchange in Platoro, Rio Grande, Santa Maria, Continental, and Beaver Reservoirs. Appendix F includes documentation for these leases.

## **2. FORBEARANCE AGREEMENTS**

Forbearance agreements have been reached with a multitude of ditches, copies of which are included in Appendix G along with a summary of the details of each agreement. Pursuant to section 37-92-501(4)(b)(I)(B), C.R.S., Subdistrict No. 3 has reached agreement with these ditches whereby they accept that, subject to the specific provisions of the forbearance agreement, injury to their water rights resulting from the use of groundwater by ARP Wells may be remedied by means other than providing water to replace stream depletions, when they are the calling right on the Conejos River system, Alamosa River, or Rio Grande. The expected yield of these agreements is as shown above in Table 3.1. See Appendix G for documentation of these Forbearance Agreements.

## **3. CLOSED BASIN PROJECT PRODUCTION**

According to the Division No. 3 Division Engineer's Rio Grande Compact Ten-Day Report on March 31, 2025, the projected production of the project delivered to the Rio Grande is 7,600 acre-feet during the calendar year 2025. The division of the Closed Basin Project production in accordance with agreements with Conejos River and Rio Grande water users' organizations and special districts is 60% to the Rio Grande and 40% to the Conejos River over the long term, with provisions for adjustments in the division during individual years.

Pursuant to the Resolution Regarding Allocation of the Yield of the Closed Basin Project, the management and allocation of the Rio Grande's share of the Project's usable yield is made by the RGWUA and the SLVWCD. At a meeting of the RGWUA's Board of Directors on March 27, 2025, the Board of Directors passed a motion to specifically allocate 4,560 acre-feet of the Rio Grande's share of the usable yield of the Closed Basin Project to replace the stream depletions under this ARP and in conjunction with Subdistrict No. 1, Subdistrict No. 2, Subdistrict No. 5 and Subdistrict No. 6. The Board of Directors of the SLVWCD approved an allocation of up to the total CBP production allocated to the Rio Grande, or 60% of the total useable CBP yield in 2025, so long as Subdistrict's use does not affect the allocation of CBP flows to the Rio Grande and Conejos River's compact obligations. The CWCD Board of Directors allocated the Conejos's 40% share of the usable yield of the Closed Basin Project to replace the stream depletions under this ARP. The projected amount of the CBP production needed by Subdistrict No. 3 under this ARP is shown above in Table 3.1. See Appendix H for a copy of these letters.

## **11.1.5 DOCUMENTATION OF PROGRESS TOWARDS ACHIEVING AND MAINTAINING A SUSTAINABLE WATER SUPPLY**

Rule 8.1.7 of the Groundwater Rules includes provisions for meeting the requirements for achieving and maintaining a Sustainable Water Supply in the confined aquifer. Per the State Engineer’s approval letter for the PWM, dated August 27, 2018, the Conejos Response Area five-year running average groundwater withdrawals were above the 1978-2000 average groundwater withdrawals for the Conejos Response Area with a five-year average of 30,107 acre-feet, however, per the Confined Aquifer Sustainability (CAS) Stipulations in Case No. 2015CW3024, the stipulated 1978-2000 average is 30,400 acre-feet, which is the actual metric that is referenced when determining the Subdistrict’s sustainability.

Per the July 1, 2024, memo from the State Engineer, “Five Year Groundwater Withdrawals in Confined Aquifer Response Area in Division 3: July 2024 Requirement of Division 3 Groundwater Rules Section 8.1.5,” the 2019-2023 five-year average groundwater withdrawals for the Conejos Response Area was 25,876 acre-feet. The next five-year average will drop the 2019 withdrawals of 16,323 acre-feet. 2024 was an average year on the Conejos River and groundwater withdrawals decreased slightly from the previous year, therefore, it is anticipated the State Engineer’s next calculation of the Conejos Response Area five-year average will increase by approximately 1,450 acre-feet based on the trend in the Subdistrict. With this increase, the five-year average for the Conejos Response Area will be above the 1978-2000 average groundwater withdrawals and be above the average that was calculated per the July 1 memo at the time the Subdistrict’s PWM was approved **but below** the average that was agreed upon and dictated in the CAS Stipulations. The State Engineer’s memo is included in Appendix J.

The current five-year running average groundwater withdrawals for ARP Wells, which includes 24 contract wells, for the period 2020-2024 is 27,322 acre-feet. The previous five-year running average from 2019-2023 for ARP wells, including contract wells, was 25,761 acre-feet. The five-year running average increased in 2024 by 1,561 acre-feet for ARP Wells with the 2020-2024 five-year running average. This calculation is based on 2024 groundwater withdrawals downloaded on April 2, 2025, from the records of the Division of Water Resources for ARP wells.

Based on the trends of both the Conejos Response Area, the Subdistrict’s five-year average, and taking into account the CAS Stipulations determined in Case No. 2015CW3024, the Subdistrict will remain in compliance with the Sustainable Water Supply Requirement of the Rules.

### **1. WATER LEVELS, PRESSURE LEVELS, AND/OR GROUNDWATER WITHDRAWALS**

Included as Appendix K is a chart which includes the water level measurements obtained in March of each year for the wells used by DWR to calculate the Composite Water Head for the Conejos Response Area. Also included in Appendix K is the State Engineer’s memo dated July 1, 2024, regarding the “Composite Water Head for Confined Aquifer Response Area in Division 3: July 2024 Requirement of Division 3 Groundwater Rules Section 8.1.4.” Additionally, the

Conejos River System Water Users Association has been collecting hydrostatic pressure data in the Subdistrict No. 3 Response Area and will provide the data to the DWR to continue to improve the understanding of sustainability.

## **2. LISTING OF IRRIGATED ACRES PROPOSED TO BE TEMPORARILY OR PERMANENTLY FALLOWED AND ASSOCIATED WATER RIGHTS**

The Board of Managers included language in the PWM to continue to monitor groundwater withdrawals for the purpose of meeting the Sustainable Water Supply requirements in the Groundwater Rules and to propose remedies, if necessary, as part of the ARP process. The Board of Managers did assess a portion of their fees to build up revenues that can be used, if necessary, to fund current and future programs to meet these requirements. For 2025, the Board of Managers decided to continue monitoring groundwater withdrawal amounts following the first Subdistrict assessments to determine what, if any, affect they would have on groundwater withdrawal amounts. It is anticipated that the imposition of the Groundwater Withdrawal Fees will naturally reduce the amount of groundwater withdrawn by ARP Wells and maintain the Subdistrict's groundwater withdrawals within the limits set by the Groundwater Rules. In addition to monitoring the annual groundwater withdrawal amounts relative to the Groundwater Withdrawal Fee, the Board of Managers elected to implement the additional incentive measure of a Pumping Reduction Program during the 2025 irrigation season to further the efforts towards meeting the Sustainable Water Supply requirements. The Pumping Reduction Program is further detailed in Paragraph 4 below.

## **3. LISTING OF WATER RIGHTS PROPOSED TO BE TEMPORARILY OR PERMANENTLY RETIRED AND HISTORICAL OPERATIONS OF EACH WATER RIGHT**

On December 19, 2024, the Subdistrict purchased a well from Mrs. Danette Sowards for the purpose of inactivating the well and ceasing all of its groundwater withdrawals in order to aid the Subdistrict's efforts in meeting the Sustainable Water Supply requirements in the Groundwater Rules. The well is known as Well No. 1, Case No. W-335, WDID 2205076, Permit No. 11721-R, and is decreed for irrigation and fish and wildlife culture in Case No. W-335. The well had been used for irrigation until 2020, at which point its use changed to fish culture. The well's groundwater withdrawals averaged approximately 152 acre-feet annually between 2009 and 2020 while it was being used for irrigation purposes. The groundwater withdrawals greatly increased once it began to be used for fish culture, with the average groundwater withdrawals increasing to approximately 861 acre-feet between 2020 and 2023. The Subdistrict plans to keep the well inactive for the foreseeable future. See Appendix F for documentation of this purchase.

## **4. OTHER PROPOSED ACTIONS TO BE TAKEN AS APPLICABLE**

The Subdistrict is implementing a Pumping Reduction Program (PRP) for the 2025 irrigation season. The goal of the PRP is to compensate Subdistrict Members that reduce their groundwater withdrawals on Farm Unit basis to assist in attaining and maintaining the sustainability of the Confined Aquifer underlying Subdistrict No 3. For the 2025 Plan Year, participating Subdistrict

Members have committed to reducing their overall pumping by approximately 356.8 acre-feet.

In addition to the PRP, the Subdistrict has had several meetings with Subdistrict Members during the 2023 and 2024 Plan Years to receive feedback, inform them, and to generally address how the Subdistrict plans on achieving and maintaining a sustainable confined aquifer within Subdistrict boundaries. Through these meetings the Subdistrict has developed ideas, through Subdistrict Member input and contracted engineering work, on what actions would be most effective and also least intrusive in order to achieve its sustainability goals. These meetings were productive and the Subdistrict plans on implementing aquifer sustainability measures if a voluntary reduction in pumping by Subdistrict Members and the PRP does not lead to a positive sustainability trend, including the possible implementation of a groundwater allocation program.

The Subdistrict has also approved a resolution to incentive the RGWCD's Senate Bill 22-028 well purchase program by adding an additional \$500 per acre-foot payment to Subdistrict Members whose program applications are approved.