

ORIGINAL



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HC 7, Box 452
Payson, AZ 85541

De

Jeff Hatch-Miller, Chairman
Kristin K. Mayes, Commissioner
Barry Wong, Commissioner
William Mundell, Commissioner
Mike Gleason, Commissioner

Cc: Dwight Nodes, Admin. Law Judge
Steve Olea, Assistant Director, Utilities
Marlin Scott, Jr., Utilities Staff Engineer
Docket Control Staff
Bradley Morton, Consumer Analyst
Arizona Corporation Commission

Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

DOCKETED

OCT 26 2006

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RE: Payson Water Co. Geronimo Estate
Docket, 05-0729
W-03514A-05-0729

DOCKETED BY
Elusive Acre System
nr

Dear Commissioners and Staff:

As one of the eight property owners on the Geronimo/Elusive system that received a new water meter during the last month, I am still very concerned about the apparent under-utilization of readily available water resources by Payson Water Co. (hereinafter PWC), and the effect this has on my neighbors.

During the last hearing on the 25 year-old moratorium in our community, Harry Jones of Gila County pointed out that the Elusive Acres well was being operated only about 2.8 hours per day. Since that hearing and his suggestion that PWC should operate the well more hours of the day, PAWCo has apparently started to run the well 7 to 13 hours per day, a very reasonable operating schedule. This operational change has allowed our community to access significantly more water and to avoid any water outages or restrictions over this summer, which has been characterized as the most severe months of the current drought.

Now that the summer is over and PWC has submitted the required reports as you ordered in Decision 68696, important conclusions can be drawn from the data collected:

- From May 2005 to April 2006, the 12 month period immediately prior to Mr. Jones' suggestion, the Geronimo well (reportedly 6 gpm) provided 41K-174K gallons per month, and averaged 78% of all water resources to the distribution system. The Company reported static water levels (distance to water from the surface) that ranged from 20.8 feet to 32 feet, ending at only 20.8 feet at the end of August.
- From May 2006 through August 2006 (the first four months after Mr. Jones' suggestion to run the well more hours), the Geronimo well was rested and the well only needed to provide 9K-32K gallons per month, an average of only 10% of the total water required (versus 78% the prior year). The static level during the four months ranged from 21.0 feet to 22.2 feet, an insignificant difference

indicating the well was not being pumped dry because of increased activity in the Elusive well or other neighboring wells.

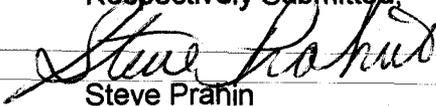
- From May 2005 to April 2006, the 12 month period prior to Mr. Jones' suggestions, the Elusive Acres well (reportedly 10 gpm) provided 16K-78K gallons per month, and average 22% of the water resources provided to the residents (excludes one month reported at 165K gallons, a probable error since the water produced that month, in excess of sales of water, could not possibly have been stored in the limited capacity 15K gallon tank). The static level of water in this well ranged from 15 feet to 57 feet, ending at 50.4 feet, and a loss of only 35 feet of water over 12 months in a well 300 feet deep (leaving about 250 feet of water in the well).
- From May 2006 through September 2006 (the last four months since Mr. Jones' suggestions), the reports indicate the Elusive well provided 141K-250K gallons per month, or 90% of all water sold to the residents. The static level of water in this well ranged from 48 feet to 75 feet, ending at 48 feet and gaining two feet of water over the summer. Assuming 10 gpm from this well (Marlin Scott had roughly measured it at 16 gpm last spring), this well has been operated about 7 to 13 hours per day, rather than the 2.8 hours per day during the preceding 12 month period. This has all been done without affecting the Geronimo well (about 500 feet away), and without significantly affecting the recovery or static levels of the Elusive well.

The recent period of increased use of the Elusive well (3 to 9 times the use of the prior year), with no significant drop in water levels or harm to neighboring wells, seems to indicate a severe under-utilization of available resources. This under-utilization appears to have occurred over many years, and has apparently been the justification for keeping the unfair zero meter moratoriums in place for the last 25 years. PWC's not looking for new water, let alone not knowing what water really existed, is inexcusable and has placed many property owners and residents in horrible positions over the years.

In addition to the misuse of resources, it is interesting to note that the day Mr. Hardcastle heard Mr. Jones' suggestion to pump the Elusive well more, he told Jimmy Dunn (another Geronimo property owner) and me in the parking lot of the ACC that he didn't care if 50 new meters were added to the system. Is this a possible indication of an awareness on his part that the Elusive well was being under-utilized? Is this situation similar to the situation in Pine where the claims of "no more water is under Pine" have been thoroughly disproved over the last few months?

Based on this information, I request the ACC order elimination of the existing zero moratorium on the Geronimo/Elusive system and replace the restrictions by adding three (3) new connections per month over the next year, and extending the monitoring and reporting period by 12 more months. If the system continues to provide adequate water over the next year and no major draw-downs of static levels occur, the moratorium should be lifted entirely.

Respectfully Submitted,



Steve Prahin