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BEFORE THE ARIZONA CORPORATION COMMISSION

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**COMMISSIONERS**

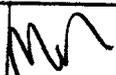
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Kristin K. Mayes, Chairman  
Gary Pierce  
Paul Newman  
Sandra D. Kennedy  
Bob Stump

AZ CORP COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission  
**DOCKETED**

JAN 16 2009

DOCKETED BY 

IN THE MATTER OF THE APPLICATION  
OF ARIZONA WATER COMPANY FOR AN  
EXTENSION OF ITS CERTIFICATE  
OF CONVENIENCE AND NECESSITY AT  
COOLIDGE, PINAL COUNTY, ARIZONA

**DOCKET NO. W-01445A-06-0317**

**REQUEST FOR ADDITIONAL TIME TO  
COMPLY WITH FILING REQUIREMENT**

On March 22, 2007 the Commission entered Decision No. 69386 in the above-captioned docket. Decision No. 69386 (the "Decision") approved Arizona Water Company's (the "Company") application for an extension of its Certificate of Convenience and Necessity for its Coolidge system. The second and third ordering paragraphs of the Decision, at page 13, conditioned the approval of the extension on the conditions stated therein, namely, that the Company file a copy of the first approval to construct for facilities needed to serve the requested areas issued by the Arizona Department of Environmental Quality, and a copy of the first developer's certificate of assured water supply ("CAWS") for the extension area, within one year of the effective date of the Decision.

On January 9, 2008 the Company filed a copy of the first approval to construct facilities needed to serve the requested area. By order entered on March 4, 2008 the Commission extended until March 22, 2009 the deadline for the Company to file a copy of the first developer's CAWS.

1 The Company is now requesting an additional two (2) year period, until March 22, 2011  
2 to comply with the requirement that it file a copy of a CAWS for the first developer on or before  
3 March 22, 2009. In support of this request, the Company presents the following reasons:

- 4  
5 1. With the filling of the first approval to construct on January 9, 2008 the  
6 Company filed all but one of the required compliance items under the Decision.  
7
- 8 2. The Company has pending with the Arizona Department of Water Resources  
9 ("ADWR") an application for a new physical availability determination for its  
10 Pinal Valley System, including the Coolidge system. Developments that may  
11 be included in the expansion area approved by the Decision may need to rely on  
12 the revised determination, which will not be approved before March 22, 2009.  
13
- 14 3. ADWR has granted, and the Company has attached hereto a copy thereof as  
15 Exhibit A, an approval of a service area right for the Coolidge Airport water  
16 system that the Company is now serving, under a lease agreement with the City  
17 of Coolidge; the airport water system is located in the CCN expansion area  
18 approved in the Decision. The Company submits that, not only is the service  
19 arrangement important to the City of Coolidge, the service area right, which the  
20 Company obtained with the cooperation of the City, is evidence of the  
21 continuing desire and need for the provision of water service within the CCN  
22 expansion area.  
23
- 24 4. An Analysis of Assured Water Supply Application, a copy of which is attached  
25 hereto as Exhibit B, is pending with ADWR for a development known as  
26 Randolph & Attaway, which is also located in the CCN expansion area (in  
27 Section 12, Township 6 South, Range 8 East). An Analysis is an important  
28 preliminary step in receiving a CAWS. The Company believes, based on

1 undersigned counsel's discussion with Ground-Water Consultants, Inc., a  
2 consultant for the developers, that the cancellation of the CCN will adversely  
3 affect the developer's plans to obtain a CAWS.

4  
5 5. The Company is serving eight (8) customers in the expansion area approved by  
6 the Decision, with additional applications for service pending.

7  
8 6. The Company is attaching hereto, as Exhibits C-1 through C-41, letters from  
9 property owners or representatives for a substantial amount of the parcels  
10 located in the CCN expansion area approved by the Decision, documenting and  
11 evidencing the continuing need and desire of these property owners to obtain  
12 water service from the Company to develop their property.

13  
14 7. The State of Arizona, and the United States of America as a whole, are in the  
15 midst of a severe economic recession that may deepen and worsen before it  
16 improves. No economist or forecaster can say with any certainty when the  
17 economy may recover. The recession has had a particularly adverse effect on  
18 the real estate market in Arizona, and the impact on the market for development  
19 in Pinal County, the Company submits, was not reasonably foreseeable by  
20 anyone when the Commission entered the Decision and included post-order  
21 conditions. This reality should be considered by the Commission in evaluating  
22 the Company's Request. In addition, cancelling a Certificate of Convenience  
23 and Necessity, in effect, as a result of the adverse market conditions that exist at  
24 this time may also result in additional barriers to a market recovery and  
25 economic hardships when these developments are ready to proceed.

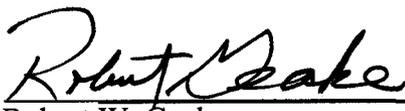
26  
27 In consideration of the foregoing, the Company respectfully requests that it be given an  
28 additional period of time, not less than two (2) years, until March 22, 2011 to file the CAWS, the

1 remaining compliance item required by the Decision. The Company further submits that the  
2 granting of time requested should not prejudice any other party, and will advance the interests of  
3 customers and developers in the expansion area.

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RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of January, 2009.

*ARIZONA WATER COMPANY*

By:   
Robert W. Geake  
Vice President and General Counsel  
ARIZONA WATER COMPANY  
Post Office Box 29006  
Phoenix, Arizona 85038-9006

1 Original and thirteen (13) copies of the foregoing filed the 16<sup>th</sup> day of January 2009 with:

2 Docket Control Division  
3 Arizona Corporation Commission  
4 1200 West Washington Street  
5 Phoenix, Arizona 85007

6 A copy of the foregoing was hand-delivered 16<sup>th</sup> day January 2009 to:

7 Janice Alward, Chief Counsel  
8 Legal Division  
9 Arizona Corporation Commission  
10 1200 West Washington Street  
11 Phoenix, Arizona 85007

12 Ernest G. Johnson, Director  
13 Utilities Division  
14 Arizona Corporation Commission  
15 1200 West Washington Street  
16 Phoenix, Arizona 85007

17 Brian Bozzo, Manager, Compliance and Enforcement  
18 Utilities Division  
19 Arizona Corporation Commission  
20 1200 West Washington Street  
21 Phoenix, Arizona 85007

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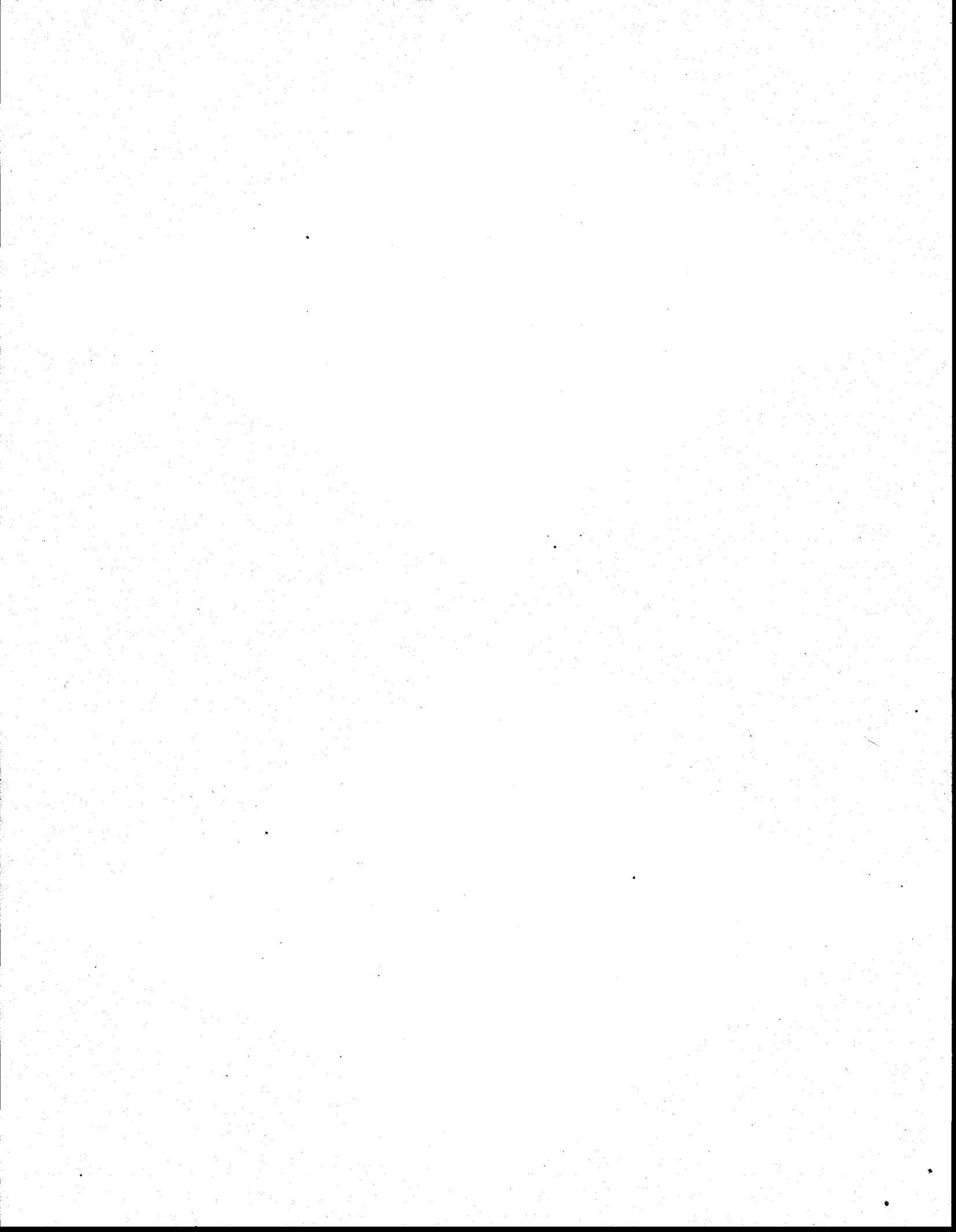


EXHIBIT A

ARIZONA DEPARTMENT OF WATER RESOURCES  
3550 North Central Avenue, Phoenix, Arizona 85012  
Telephone 602 771-8586  
Fax 602 771-8689



Janet Napolitano  
Governor

Herbert R. Guenther  
Director

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DEC 01 2008

ARIZONA WATER COMPANY  
PHOENIX - OPERATIONS

November 14, 2008

Arizona Water Company  
Attn: Tom Harrell  
PO Box 29006  
Phoenix, AZ 85038

**RE: Approval of Service Area Right No. 56-001362.0000  
Arizona Water Company – Coolidge Airport System**

Dear Small Municipal Provider:

The Department of Water Resources (Department) has reviewed all the information pertaining to the operation of your water service and has granted a new service area right to Arizona Water Company-Coolidge Airport System. Your service area right number is 56-001362.0000.

Any person withdrawing groundwater from a non-exempt well is required to use a water measuring device to record rates of withdrawal, in order to provide or allow the computation of an annual volume of pumpage. The total volume of pumpage shall be reported on an Annual Water Withdrawal and Use Report (Annual Report). The Annual Report for withdrawals in calendar year 2008 will be due on March 31, 2009. Note that the Annual Report form will be mailed to you at the above-referenced address in January 2009.

This is also an Official Notice of the conservation requirements, distribution system requirements, and monitoring and reporting requirements for small providers. These requirements were established in the Third Management Plan (TMP) and became effective January 1, 2002.

As a municipal provider serving 250 acre-feet or less of water for non-irrigation use during a calendar year, you are a small municipal provider. Upon receipt of this notice, and continuing until the first compliance date for any substitute requirements in the Fourth Management Plan, you are required to comply with the conservation requirements for small municipal providers in section 5-111 of the TMP; the individual user requirements in section 5-112 of the TMP; the distribution system conservation requirements for small municipal providers in section 5-113 of the TMP; and the applicable monitoring and reporting requirements in section 5-114 of the TMP. Those requirements are set forth in the enclosed *Attachment TMP – Small Municipal Providers*.

You should be aware that if you begin serving more than 250 acre-feet of water per year for non-irrigation use during the third management period (2000 to 2010), you will become a large municipal provider. In that event, you will be required to comply with the conservation requirements for new large municipal providers and the distribution system requirements for large municipal providers beginning with the second full calendar year after you are given written notice of those requirements by the director.

Administrative Relief from Conservation Requirements



Printed on recycled paper. Each ton of recycled paper saves 7,000 gallons of water.

The Department has found the conservation requirements in the TMP to be equitable for most water users. However, there are two separate methods for seeking administrative relief from the conservation requirements if you believe you will be unable to comply with the requirements. You may request a VARIANCE or an ADMINISTRATIVE REVIEW.

1. VARIANCE

A person who requires additional time to comply with a conservation requirement may apply to the director for a VARIANCE from the requirement pursuant to A.R.S. § 45-574. The director may grant a variance for up to five years upon a showing of "compelling economic circumstances." An application for a variance must be filed within 90 days after the date you receive this notice.

2. ADMINISTRATIVE REVIEW

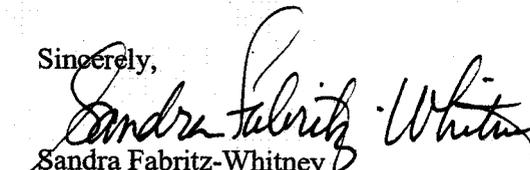
If you feel that a conservation requirement is unreasonable as applied to you, you may apply for an ADMINISTRATIVE REVIEW of the requirement pursuant to A.R.S. § 45-575(A). An application for administrative review under A.R.S. § 45-575(A) must be filed within 90 days after the date you receive this notice.

An administrative review may also be applied for at any time during the third management period if extraordinary circumstances not in existence as of the date of this notice make it unreasonable to require your compliance with a conservation requirement. If these circumstances should arise during the third management period, please contact the Pinal Active Management Area (AMA) for information and application procedures.

The Department has issued this service area right pursuant to A.R.S. § 45-492 of the Groundwater Code. The legal nature of the water withdrawn from your wells may be the subject of court action in the future as part of a determination of surface water rights in your area. If there are court proceedings that could affect your wells, you will be notified and be given the opportunity to participate.

If you have any questions regarding your conservation requirements or if you need an application form and information on the Variance or Administrative Review procedures, please contact the Pinal Active Management Area office at 520-836-4857.

Sincerely,

  
Sandra Fabritz-Whitney  
Assistant Director

Enclosure



## **Attachment TMP – Small Municipal Providers**

### **5-111. Conservation Requirements for Small Municipal Providers**

By January 1, 2002 or upon commencement of service of water, whichever is later, and until the first compliance date for any substitute requirements in the Fourth Management Plan, a small municipal provider shall adopt and implement a program to achieve the following goals:

1. Minimize waste of all water supplies.
2. Maximize efficiency in outdoor watering.
3. Encourage reuse of water supplies.
4. Reduce its total GPCD usage.

### **5-112. Individual User Requirements for Municipal Providers and Individual Users**

#### **A. Individual User Requirements**

Beginning January 1, 2002, or upon commencement of service of water, whichever is later, and for each calendar year thereafter until the first compliance date for any substitute requirement in the Fourth Management Plan, the municipal provider or individual user responsible for compliance with the individual user requirements under subsection B of this section shall comply with the following, as applicable:

1. The municipal provider or individual user shall serve water to, or use water within, a turf-related facility only in accordance with sections 6-302 through 6-305 of the Industrial Chapter of the Third Management Plan, and shall comply with the monitoring and reporting requirements set forth in section 6-205 of the Industrial Chapter, as though the individual user were an industrial user. The person responsible for compliance shall also comply with the requirements contained in section 6-202 of the Industrial Chapter, if applicable, as though the individual user were an industrial user.
2. The municipal provider or individual user shall serve water to, or use water within, a large-scale cooling facility only if the person using water at the facility complies with all applicable conservation requirements contained in sections 6-702 and 6-703 of the Industrial Chapter of the Third Management Plan as though the person was an industrial user. The person responsible for compliance shall also comply with the applicable monitoring and reporting requirements contained in section 6-203 and the conservation requirements contained in section 6-202 of the Industrial Chapter, if applicable, as though the individual user were an industrial user.
3. The municipal provider or individual user shall serve or use groundwater for the purpose of watering landscaping plants planted on or after January 1, 1987 within any publicly owned right-of-way of a highway, street, road, sidewalk, curb or shoulder that is used for travel in any ordinary mode, including pedestrian travel, only if the plants are listed in Appendix 5B. The director may waive this requirement upon request from the municipal provider or individual user if a waiver of this requirement is in the public interest. This

requirement does not apply to any portion of a residential lot that extends into a publicly owned right-of-way.

4. The municipal provider or individual user shall not serve or use groundwater for the purpose of maintaining a water feature, including fountains, waterfalls, ponds, water courses, and other artificial water structures installed after January 1, 2002 within any publicly owned right-of-way of a highway, street, road, sidewalk, curb or shoulder that is used for travel in any ordinary mode, including pedestrian travel. The director may waive this requirement upon request from the municipal provider or individual user if a waiver of this requirement is in the public interest. This requirement does not apply to any portion of a residential lot that extends into a publicly owned right-of-way.

**B. Responsibility for Compliance with Individual User Requirements**

1. A municipal provider shall be responsible for complying with an individual user requirement set forth in subsection A of this section for an existing individual user unless one of the following applies:
  - a. The provider identified the existing individual user to the director on a form provided by the Department and received by the director no later than 90 days before the adoption of the Third Management Plan.
  - b. The director gave written notice of the individual user requirement to the individual user within 30 days after the adoption of the Third Management Plan.
2. An existing individual user that has been given written notice of an individual user requirement by the director shall be responsible for complying with the individual user requirement beginning on the date specified in the notice.
3. A municipal provider shall be responsible for complying with an individual user requirement set forth in subsection A of this section for a new individual user unless one of the following applies:
  - a. The municipal provider identifies the new individual user to the director on a form provided by the Department. If the provider identifies the new individual user to the director within 90 days after the provider begins serving water to the new individual user, the municipal provider shall not be responsible for complying with the individual user requirement at any time. If the provider identifies the new individual user to the director more than 90 days after the provider begins serving water to the new individual user, the provider shall be responsible for complying with the individual user requirement beginning on the date the new individual user first receives water from the provider until the end of the calendar year in which the provider identifies the individual user to the director.
  - b. The director has given written notice of the individual user requirement to the individual user and the individual user is responsible for complying with the requirement.

4. A new individual user that has been given written notice of an individual user requirement by the director shall be responsible for complying with the individual user requirement beginning on the date specified in the notice.

**C. Notification of New Individual User by Municipal Provider**

Beginning January 1, 2002 and continuing thereafter until the first compliance date for any substitute requirement in the Fourth Management Plan, a municipal provider shall notify a new individual user in writing of its individual user requirements as set forth in subsection A of this section before commencement of service of water to the individual user.

**5-112. Conservation Requirements for Municipal Distribution Systems**

For the calendar year 2002 or the calendar year in which the provider commences service of water, whichever is later, and for each calendar year thereafter until the first compliance date for any substitute requirement in the Fourth Management Plan:

1. A large municipal provider shall not operate a municipal distribution system in a manner such that lost and unaccounted for water exceeds 10 percent of the total quantity of water from any source, except direct use effluent, withdrawn, diverted, or received by the large municipal provider for non-irrigation use on an annual or three-year average basis.
2. A small municipal provider shall not operate its municipal distribution system in a manner such that lost and unaccounted for water exceeds 15 percent of the total quantity of water from any source, except direct use effluent, withdrawn, diverted, or received by the small municipal provider for non-irrigation use on an annual or three-year average basis.

**5-113. Monitoring and Reporting Requirements for Municipal Providers and Individual Users**

For the calendar year 2002 or for the calendar year in which the municipal provider commences service of water, whichever is later, and for each calendar year thereafter until the first compliance date for any substitute requirement in the Fourth Management Plan:

1. A large municipal provider shall separately measure and report in its annual reports required by A.R.S. §§ 45-468 and 45-632 the total quantity of water from any source, including effluent, delivered each month for: (a) irrigation uses; (b) residential uses by category, including single family and multifamily; (c) non-residential uses by category, including commercial uses, industrial uses, government uses, construction uses, and other uses; and (d) turf-related facility use.
2. A municipal provider shall report the following in its annual report required by A.R.S. § 45-632:
  - a. The total quantity of water from any source, disaggregated by each source, withdrawn, diverted, or received by the provider for non-irrigation use during the reporting year, as separately measured with a measuring device in accordance with paragraph 6 of this subsection.

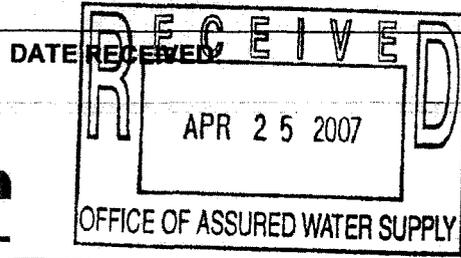
- b. The total quantity of water from any source, including effluent, withdrawn, diverted, or received by the provider for irrigation use during the reporting year.
  - c. The total quantity of effluent, disaggregated by direct use effluent, effluent recovered within the area of impact, and effluent recovered outside the area of impact, served by the provider during the reporting year for non-irrigation use.
  - d. The number of single family housing units added to the providers service area from July 1 of the previous calendar year to July 1 of the reporting year.
  - e. The number of multifamily housing units added to the provider's service area from July 1 of the previous calendar year to July 1 of the reporting year.
  - f. The total number of single family housing units and multifamily housing units served by the provider as of July 1, 2000.
  - g. The number of single family housing units and the number of multifamily housing units added to the provider's service area between July 1, 2000 and July 1 of the reporting year.
  - h. The provider's total quantity of lost and unaccounted for water during the calendar year.
  - i. The percentage of the total quantity of water from any source, except effluent, withdrawn, diverted, or received by the provider during the calendar year that is lost and unaccounted for water.
3. In addition to the information required by paragraphs 1 and 2 of this section, a large municipal provider regulated under the NPCCP described in section 5-104 shall include the following in its annual report required by A.R.S. § 45-632:
- a. The information listed in the monitoring and reporting requirement sections of those RCMs set forth in Appendix 5H.1-4 that the provider agrees in writing to implement pursuant to section 5-104, subsection E, paragraph 1.
  - b. If the provider applied for the NPCCP under section 5-104, subsection A, paragraph 4, the information required to be submitted by the provider under the Assured Water Supply Rules adopted by the director pursuant to A.R.S. § 45-576.
  - c. Any other information required by the director in order to determine the provider's compliance with the NPCCP.
4. In addition to the information required by paragraphs 1 and 2 of this section, a large municipal provider regulated under the ACP described in section 5-105 shall include in its annual report required by A.R.S. § 45-632:
- a. A status report describing progress in implementing the provider's programs proposed in its application, specifically including the provider's proposed conservation plan.

- b. The information listed in the monitoring and reporting requirement sections of those RCMs set forth in Appendix 5H.2 and 5H.4 that the provider agrees in writing to implement pursuant to section 5-105, subsection C, paragraph 3.
5. A large municipal provider shall meter water deliveries to all service connections on its municipal distribution system, except connections to fire services, dwelling units in individual multifamily units, mobile homes in a mobile home park with a master meter, and construction users.
6. A municipal provider shall make all water use measurements using measuring devices in accordance with the Department's measuring device rules, R12-15-901, et seq., Arizona Administrative Code.
7. An individual user shall meet the monitoring and reporting requirements prescribed in the Industrial Chapter, if applicable, as though the individual user were an industrial user.



EXHIBIT B

ARIZONA DEPARTMENT OF WATER RESOURCES  
OFFICE OF ASSURED AND ADEQUATE WATER SUPPLY  
3550 NORTH CENTRAL AVENUE, 2<sup>ND</sup> FLOOR  
PHOENIX, ARIZONA 85012  
28-700325 .0000  
RANDOLPH & ATTAWAY



ANALYSIS OF ASSURED WATER SUPPLY APPLICATION  
PART A - GENERAL INFORMATION

- 1. Has an Analysis of Assured Water Supply (Analysis) or a Certificate of Assured Water Supply previously been issued for this property? [ ] Yes [X] No. If "yes," this may not be the appropriate application form. Please contact the Office of Assured and Adequate Water Supply for assistance.
- 2. Development information:
  - a. Name of the development: Randolph & Attaway Estimated Number of Residential Lots: : 960
  - b. Location of the development: Township(s) 06 S Range(s) 8 E Section(s) 12 City: County: Pinal AMA: Pinal
- 3. Method of water distribution (if known): [X] Central distribution system (water provider) or [ ] Dry lot (individual wells) If there will a central distribution system, identify the water provider that will be serving the development and the water provider's system name if applicable. The water provider must be the same entity that will sign the Notice of Intent to Serve. If there will be more than one water provider for the development, please identify both water providers. Primary Water Provider: Not yet determined System Name: Secondary Water Provider (if applicable): System Name:
- 4. Contact person for questions regarding this application: Name: DeAnn Hauver Company: Southwest Ground-water Consultants, Inc. E-Mail: dhauver@sgcground-water.com Address: 3033 North 44<sup>th</sup> Street, Suite 120, Phoenix, Arizona 85018 Phone: (602) 955-5547 Fax: (602) 955-7585
- 5. Owner(s) of the property or Developer (if applicable) (attach additional sheets, if necessary): Owner: See Attachment I Phone: Fax: Address: See Attachment I E-mail: Developer (if applicable): Phone: Fax: Address: E-mail:
- 6. Please include a copy of the proposed development plan map (reference as attachment): Attachment III

I DO HEREBY certify that the information contained in this application and all information accompanying it is true and correct to the best of my knowledge and belief. NOTE: All owners must sign (attach additional sheets, if necessary). If the signator is someone other than the owner, please provide proof of legal authority to sign on the owner's behalf that is dated within 90 days of the date this application is submitted to the Department.

See Following Signature Pages

Name and Title of Owner/Owner's Authorized Agent (if signator is someone other than the owner)

See Following Signature Pages

Signature of Owner/Owner's Authorized Agent Date

Name and Title of Developer/Developer's Authorized Agent (if signator is someone other than the developer)

Signature of Developer/Developer's Authorized Agent Date

**Signature Page**  
**Application for an Analysis of Assured Water Supply**  
**Randolph & Attaway**

**Brinolu Farms, LLC, an Arizona limited liability company**

Name of Owner's Authorized Agent (please type or print): Brent A. Bowden

Title of Owner's Authorized Agent (please type or print): Manager

 \_\_\_\_\_ 1/26/07 \_\_\_\_\_  
Signature of Owner or Owner's Authorized Agent Date

**Signature Page**  
**Application for an Analysis of Assured Water Supply**  
**Randolph & Attaway**

**Viel Gluck Limited Partnership, an Arizona limited partnership**

Name of Owner's Authorized Agent (please type or print): Brent A. Bowden

Title of Owner's Authorized Agent (please type or print): Manager of Viel Gluck, LLC General Partner



1/26/07

Signature of Owner or Owner's Authorized Agent

Date

**Signature Page**  
**Application for an Analysis of Assured Water Supply**  
**Randolph & Attaway**

**Ben Fatto Limited Partnership, an Arizona limited partnership**

*By: Ben Fatto LLC, general partner*

Name of Owner's Authorized Agent (please type or print): Craig D. Cardon

Title of Owner's Authorized Agent (please type or print): Manager

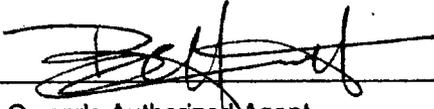
Craig D. Card \_\_\_\_\_ 1/26/07  
Signature of Owner or Owner's Authorized Agent Date

**Signature Page**  
**Application for an Analysis of Assured Water Supply**  
**Randolph & Attaway**

Seven Hills Limited Partnership, an Arizona limited partnership

Name of Owner's Authorized Agent (please type or print): BROO C. HIATT

Title of Owner's Authorized Agent (please type or print): MANAGER OF G.P.

 29 JAN 07  
Signature of Owner or Owner's Authorized Agent Date

HIATT

7. Please indicate which assured water supply requirements you intend to prove with this application, pursuant to A.A.C. R12-15-703(E):

I am seeking to prove:

- Physical availability (A.A.C. R12-15-716)
- Continuous availability (A.A.C. R12-15-717)
- Legal availability (A.A.C. R12-15-718)
- Adequate water quality (A.A.C. R12-15-719)
- Consistency with the management plan (A.A.C. R12-15-721)
- Consistency with the management goal (A.A.C. R12-15-722)

**PART B - DEMAND ESTIMATE AND LAND USES**

Please use and attach the Subdivision/Development Calculator provided by the Department (See [http://www.azwater.gov/WaterManagement\\_2005/Content/OAAWS/Demand\\_Calculator.xls](http://www.azwater.gov/WaterManagement_2005/Content/OAAWS/Demand_Calculator.xls)) OR provide a detailed explanation of the assumptions used in estimating water demand (reference at attachment): Attachment IV. NOTE: Acreages used in the demand estimate should correspond to the development plan map referenced in question 6 in Part A.

TOTAL ANNUAL DEMAND AT BUILD-OUT: 789.89 acre-feet per year

**PART C - CONTINUOUS AVAILABILITY AND LEGAL AVAILABILITY OF SOURCE WATER**

- Development will be a dry-lot subdivision.
- Water provider is unknown at this time. If this applies, please answer Question 2.a., as it applies to the development in general, not a specific water provider, and skip to Part D. Additionally, the Notice of Intent to Serve is not needed for this application. NOTE: Prior to issuance of any Certificates of Assured Water Supply referencing this analysis, legal availability of water will need to be proven.

1. Indicate proposed water uses for water provider(s):

Water Provider	Proposed Water Uses				
	Potable	Non-potable	Livestock Grazing	Urban Irrigation (mini-farm)	Other
Primary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Secondary (if applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Indicate proposed water sources for water provider(s):

a. To complete the table below, multiply the Total Annual Demand computed in Part B by 100 to obtain the 100-year demand and enter at the bottom of the chart. Enter the appropriate 100-year demands for each type of water delivered to the subdivision for each category.

b. Are the providers currently delivering water to customers?

Primary water provider:  Yes  No      Secondary water provider (if applicable):  Yes  No

c. Is the subdivision within 660 feet of the providers' existing distribution lines?

Primary water provider:  Yes  No      Secondary water provider (if applicable):  Yes  No

If "No", the subdivision is not within the existing Service Area. Please indicate how the subdivision will be incorporated within the Service Area:

Establish a New Service Area. Please provide a copy of the Petition to Establish a Service Area filed with the AMA, along with the accompanying groundwater right, and approved well permit. Please be aware that a sufficient volume of groundwater rights must be demonstrated to support the needs of the expected first year build-out of this subdivision. Please provide a copy of the Petition and reference as attachment: \_\_\_\_\_

-OR-

Water Line Extension. Please provide a copy of a Line Extension Agreement or similar agreement stating that a new service main will be constructed connecting the subdivision with the existing Service Area of the provider and reference as attachment: \_\_\_\_\_

d. Is the subdivision within the providers' CC&N or district boundary (if applicable)?  Yes  No

3. See A.A.C. R12-15-717 and R12-15-718 for documentation that should be submitted as evidence of continuous availability and legal availability (respectively) for each source of supply. Please reference attachment(s): \_\_\_\_\_

Source of Supply	100 Year Volume (ac-ft)	
	Primary Provider	Secondary Provider
Groundwater	78,989	
Central Arizona Project Water <input type="checkbox"/> Direct treatment and delivery <input type="checkbox"/> Recovered water		
Surface Water <input type="checkbox"/> Direct treatment and delivery <input type="checkbox"/> Recovered water		
Effluent <input type="checkbox"/> Direct treatment and delivery <input type="checkbox"/> Recovered water		
Other		
<b>Total 100-yr Volume</b>	<b>78,989</b>	

**PART D - PHYSICAL AVAILABILITY OF SOURCE WATER**

If the development consists of more than 20 lots, a comprehensive hydrologic study must be submitted with this application, unless the Department has previously reviewed the hydrologic conditions for this area and has issued a valid Letter of Water Availability, Physical Availability Determination or Analysis of Assured Water Supply. Please indicate the evidence of physical availability and reference as an attachment: **See Separate bound report - Hydrogeologic Investigation Aviara and Randolph & Attaway Developments, Pinal County, Arizona**

- Water Availability Letter                       Physical Availability Determination  
 New Hydrologic Study                       Other, please specify: \_\_\_\_\_

**PART E - WATER QUALITY**

- Water quality will not be proven at this time.** If this applies, water quality does not need to be proven at this time, please skip to Part F. **NOTE:** Prior to issuance of any Certificates of Assured Water Supply referencing this analysis, water quality will need to be proven.
- Are the well or wells from which water will be withdrawn for the development within one mile of a Water Quality Assurance Revolving Fund (WQARF) or Superfund site?  Yes  No.  
 If "Yes", please submit a contaminant migration and mitigation analysis demonstrating that the water supply will continue to meet the water quality requirements in A.A.C. Title 18, Chapter 4, and reference as attachment: \_\_\_\_\_
  - Water provider(s) serving the development will be regulated by the Arizona Department of Environmental Quality (ADEQ) or another governmental entity with equivalent jurisdiction. If this applies, independent proof of adequate water quality is not required, please skip to Part F. **NOTE:** If there is more than one water provider, and one or more of the providers are not regulated as indicated above, please answer question 4 for each of the unregulated providers.
  - If the development will be a dry-lot subdivision, please provide current (within the last 60 days) analytical results on water samples taken from a well or wells constructed *within the development*, or near where the wells will be drilled, demonstrating that the water meets the water quality requirements in A.A.C. Title 18, Chapter 4, and reference as attachment: \_\_\_\_\_
  - If the development will be served by a central provider that serves 15 customers or less, provide current (within the last 60 days) analytical results on water samples taken from a well or wells constructed *within the service area serving the development*, demonstrating that the water meets the water quality requirements in A.A.C. Title 18, Chapter 4, and reference as attachment: \_\_\_\_\_

**NOTE:** Information on the required water quality analyses may be found at the ADEQ website <http://www.adeq.gov>.

**PART F - CONSISTENCY WITH MANAGEMENT GOAL**

**Development will be a dry-lot subdivision (see question 3, Part A) AND has 20 or less lots.** If this applies, the subdivision is exempt from proving consistency with the management goal, please skip to Part G.

If the development has more than 20 lots and if groundwater is a proposed source of water for this development, indicate how the groundwater use for the development will meet the "consistency with management goal" requirement. Please check all that apply below:

- Will enroll the subdivision lands in the Central Arizona Groundwater Replenishment District (Phoenix, Tucson and Pinal AMAs **ONLY**).  
A separate application for membership must be filed with the Central Arizona Water Conservation District, and the membership documents **must be executed and recorded before** a Certificate of Assured Water Supply will be issued. However, an Analysis can be issued prior to enrollment.
- Will extinguish grandfathered groundwater rights dedicated to this subdivision.  
Provide evidence of ownership of right (reference the attachment): \_\_\_\_\_
- Will dedicate Long-Term Storage Credits (Recharge)  
Provide evidence and reference the attachment: \_\_\_\_\_
- Will not have to meet the consistency with goal requirement based upon an exemption granted by the Director of the Department of Water Resources for the withdrawal and use of poor quality water pursuant to a remedial action.  
Provide evidence and reference the attachment: \_\_\_\_\_
- Will not have to meet the consistency with goal requirement based upon an exemption from conservation requirements due to waterlogging.  
Provide evidence and reference the attachment: \_\_\_\_\_

**PART G - CONSISTENCY WITH MANAGEMENT PLAN**

**Development has less than 50 lots.** If this applies, the development is exempt from meeting the Consistency with Management Plan, you may skip to Part H. However, if implementation of conservation requirements are planned for this development, please answer the relevant questions below.

1. For the municipal or county jurisdiction within which the development is located, list any water conservation ordinances and briefly describe the sections that apply to the subdivision. If they will serve as evidence of your demand projections, please reference as attachment.

N/A

- 2. Will the development incorporate Conditions, Covenants and Restrictions (CC&Rs) or other conditions that will limit exterior water demand?  Yes  No. If "Yes", please reference as attachment: \_\_\_\_\_
- 3. Will landscaping in public rights of way conform to the Department's Low Water Use Plant List?  Yes  No
- 4. Generally describe any other current or proposed conservation practices, rates, fees, restrictions, policies and devices to be utilized within the development to meet the conservation requirements of the Management Plan: \_\_\_\_\_

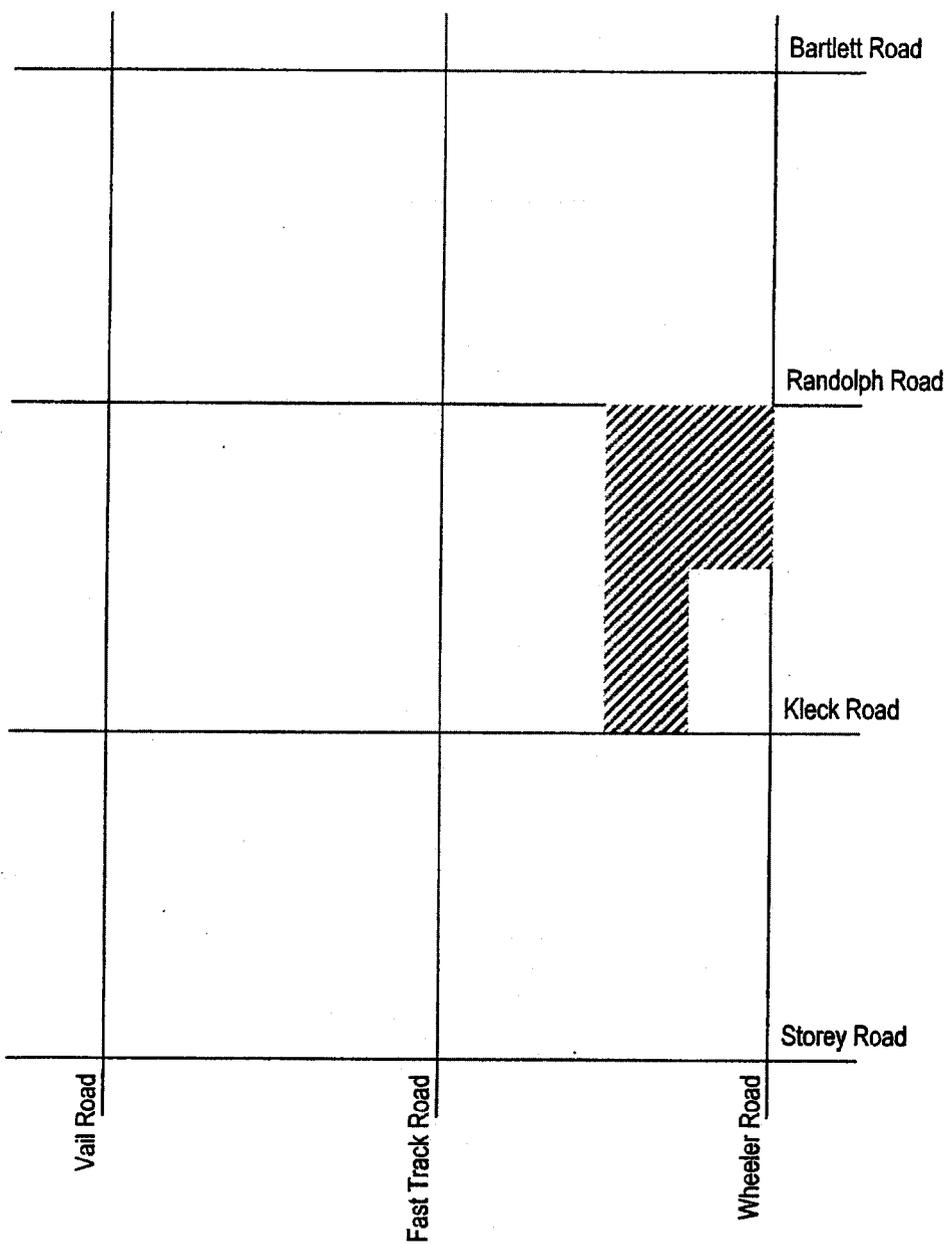
New Construction Technology

**NOTE:** If demand estimates rely on these conservation requirements, please reference attachment: \_\_\_\_\_

**PART H - FEES**

**The application fee for an Analysis of Assured Water Supply is \$7,500.00.**

Payment may be made by cash, check, or credit card. Checks should be made payable to the Department of Water Resources. **Failure to enclose the required fees will cause the application to be returned. Fees for analyses of assured water supply are authorized by A.R.S. § 45-113.**



 HDR = 48 Acres (20 DU/AC)    MIXED USE = 240 Acres  
 COMM = 192 Acres

Total = 240 Acres

*Randolph & Attaway - 240  
LUP & vicinity Map - Exhibit A*

February 6, 2007

### SUBDIVISION DEMAND CALCULATOR

**PLEASE FILL OUT AND PRINT BOTH WORKSHEETS AND ATTACH TO YOUR APPLICATION!**

Site Information

Name of Subdivision:

Randolph & Attaway

TOTAL ACRES      Acres in Turf      Acres in LWU      Acres NWU

<b>Gross Acres:</b>	240.00			
Net Acres:				
<b>Residential acres:</b>	40.80			
Acres in lots:				
Single family acres:	0.00			
Multi-family acres:	40.80			
<b>Non-residential acres:</b>	199.20	1.80	5.40	192.00
Right of way acres:				
Tract acres:	199.20	1.80	5.40	192.00
	192.00			192.00
Commercial acres:				
Golf course acres:				
Number of golf holes:				
Common area acres*:	7.20	1.80	5.40	0.00
Detention/Retention basin acres:				
Park acres:				
School acres:				
Other non-residential acres:				

\*Common area acres estimated at 3% total project acreage with 25% turf and 75% LWU  
 NOTE: Residential acres includes all land uses classified as residential. Acres in lots is the sum of the square footage of all lots.  
 NOTE: The sum of the tract acres and the right of way acres should equal the non-residential acres. The sum of all the specific types of non-residential land uses should equal the tract acres.  
 NOTE: The sum of all the specific types of land use acres, plus the right of way acres, should equal the gross acres.  
 NOTE: LWU = Low water use, NWU = No water use (hardscape or native vegetation)

28-700325.0000

RANDOLPH & ATTAWAY

**HYDROGEOLOGIC  
INVESTIGATION**

**AVIARA AND RANDOLPH & ATTAWAY  
DEVELOPMENTS  
Pinal County, Arizona**

Prepared for:

**Cardon Bowden Investments/Cardon Hiatt Companies**  
1223 S. Clearview Avenue  
Suite 105  
Mesa, Arizona 85209

Prepared by:

**Southwest Ground-water Consultants, Inc.**  
3033 N. 44<sup>th</sup> Street  
Suite 120  
Phoenix, Arizona 85018

April 24, 2007



**EXECUTIVE SUMMARY**  
**HYDROGEOLOGIC INVESTIGATION**  
**Aviara and Randolph & Attaway Developments**  
**Pinal County, Arizona**  
**Southwest Ground-water Consultants, Inc.**  
**April 24, 2007**

Aviara and Randolph & Attaway developments (the Developments) are located approximately 1.5 miles west and 3.7 miles southeast of the City of Coolidge in the Eloy Sub-basin of the Pinal Active Management Area (AMA). The legal description for the Aviara development includes a portion of Sections 19 and 30 in Township 5 South, Range 8 East of the Gila and Salt River baseline and meridian. The land use plan for the Aviara project consists of approximately 734 acres with 3,237 single family lots, 1,122 multi-family units, 27 acres for two proposed K-8 elementary schools, and 45 acres of commercial. The Randolph & Attaway legal description includes a portion of Section 12 in Township 6 South, Range 8 East of the Gila and Salt River baseline and meridian. The land use plan for the Randolph & Attaway project consists of approximately 240 acres with 960 single family lots and 192 acres of commercial.

A detailed hydrogeologic report has been prepared by Southwest Ground-water Consultants, Inc. (SGC) in order to evaluate the ground-water resources available to the Developments, and to establish the long-term yield of the underlying aquifer. Hydrogeologic data presented in this report were compiled from various hydrogeologic literature sources, including the Arizona Department of Water Resources (ADWR).

The long-term 100-year impact on the regional aquifer due to the projected ground-water pumping for the Developments was estimated by use of the analytical model THWELLS v 4.01 (van der Heijde, 1996). The estimated total pumping of 2,371.68 acre-feet per year (ac-ft/yr) at Aviara was projected to result in a maximum drawdown impact of 64.5 feet at the proposed well #1. The Randolph & Attaway analysis estimated the total pumping of 789.89 ac-ft/yr would have a maximum calculated drawdown impact of 108.0 feet.

The depth to water after 100 years of pumping for each of the Developments was determined by adding the following items to the calculated aquifer impact at each Development:

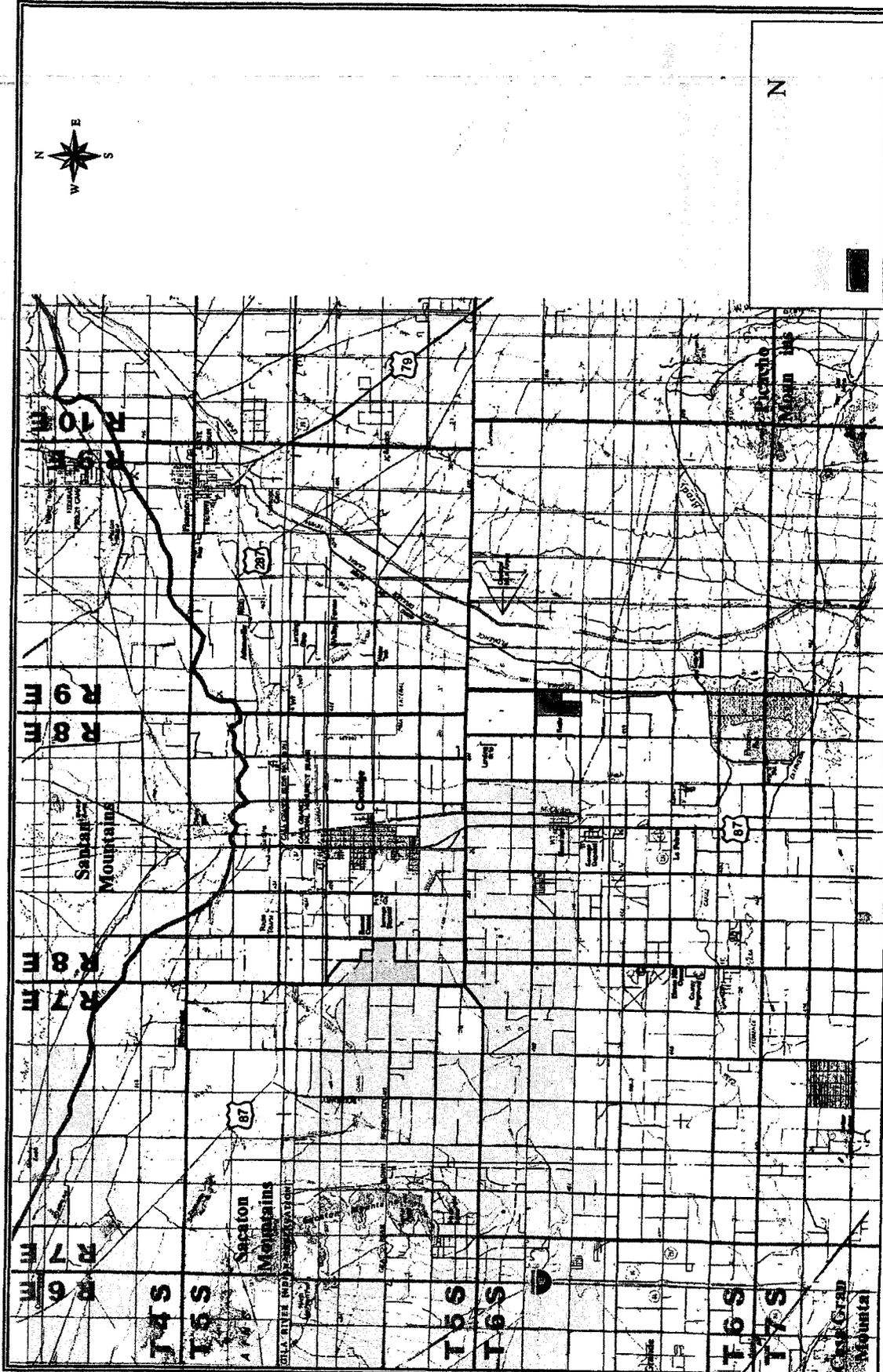
- the current depth to water



- the projected impact associated with the other Development
- the projected impact associated with adjacent off-site projects approved for Designations of Assured Water Supply (DAWS), Analyses of Assured Water Supply (AAWS), and Certificates of Assured Water Supply (CAWS)
- the projected impact of pumping associated with ten off-site AAWS projects, pending approval from ADWR, including LeSueur 520, Earley & La Palma, Hanna & Picacho, Hotts & Sunshine, Hotts & Eleven Mile Corner, Pretzer & Sunshine, Shay & Sunshine, Daybreak at Picacho, Sendera, and Pinebrooke & Diffin
- the water level decline trend, which was conservatively assumed to be -2.3 ft/yr at the Aviara development and -0.77 ft/yr at the Randolph & Attaway development

The projected 100-year depth to ground water for Aviara and Randolph & Attaway was calculated to be 857 feet below land surface (ft bls) and 834 ft bls, respectively. Each of the depth to ground-water projections is less than the 1,100 ft bls depth to ground water limit established for water providers in the Pinal AMA by ADWR Rule R12-15-716. Based on the impact analysis presented, sufficient ground water is available in the underlying regional aquifer to meet the water demands of the proposed Developments for 100 years.





Southwest Ground-water  
 Consultants, Inc.



March 9, 2007 Project B.1406



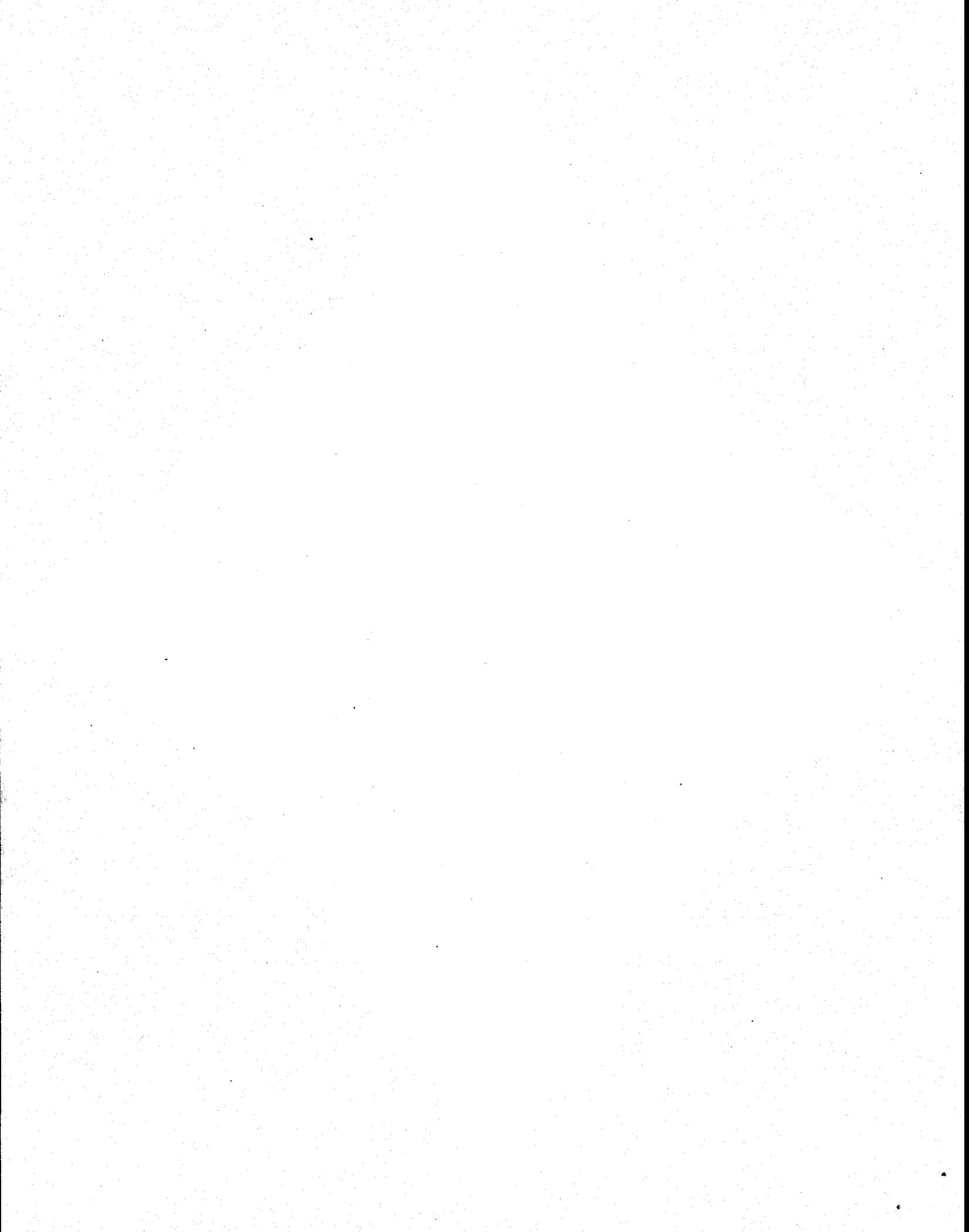


EXHIBIT C-1

**LONESOME VALLEY FARMS LTD PSHIP**  
**1800 W HWY 287**  
**CASA GRANDE, AZ 85294**

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-039, 209-07-002D, 209-18-001, 209-18-002C, 209-19-001, 209-19-002, 209-19-003, 209-19-004, 209-19-005, and 209-19-013. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**LONESOME VALLEY FARMS LTD PSHIP**

By: *Alice Gil Roberts*  
Authorized Representative

Its: *owner*

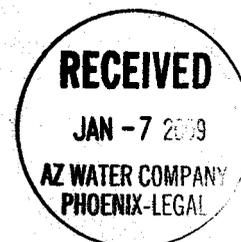


EXHIBIT C-2

ALICE GAIL ROBERTSON  
1800 W HWY 287  
CASA GRANDE, AZ 85294

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 209-18-002B, and 209-18-002D. I still need and desire to receive water service from Arizona Water Company to serve these parcels. My current plans include beginning development within twenty-four months if market conditions do not worsen.

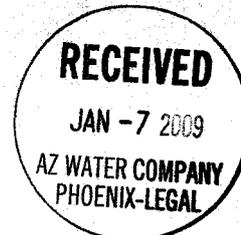
If you have any questions, please feel free to contact me.

Sincerely,

ALICE GAIL ROBERTSON

By: Alice Gail Robertson  
Authorized Representative

Its: owner



**EXHIBIT C-3**

LAWRENCE & ROSALYN LEWIS  
4755 N WHEELER RD  
COOLIDGE, AZ 85228

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

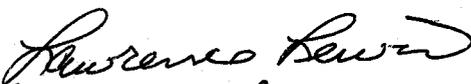
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 400-36-002A. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

LAWRENCE & ROSALYN LEWIS

  
By: Rosalyn Lewis  
Authorized Representative

Its: \_\_\_\_\_

**EXHIBIT C-4**

**COOLIDGE HOLDING LLC**  
2235 FARADAY AVE SUITE O  
CARLSBAD, CA 92008

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

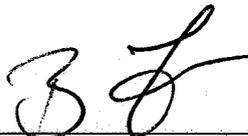
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-21-001, and 401-21-005. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**COOLIDGE HOLDING LLC**

By:   
Authorized Representative

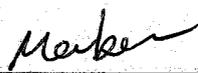
Its: 



EXHIBIT C-5

JOSE ANTONIO & DIONNE PALOMINO  
PO BOX 11038  
CASA GRANDE, AZ 85038

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-018. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

JOSE ANTONIO & DIONNE PALOMINO

By: *Jack Jones for Jose Antonio Palomino*  
Authorized Representative

Its: \_\_\_\_\_



**EXHIBIT C-6**

CHANDLER BOYS VENTURES LLC  
1071 E IVANHOE ST  
GILBERT, AZ 85296

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

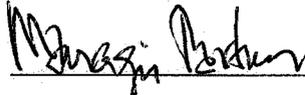
This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 209-28-001. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

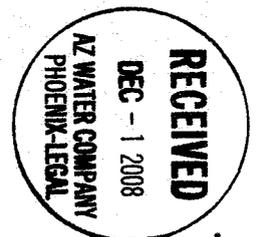
If you have any questions, please feel free to contact us.

Sincerely,

CHANDLER BOYS VENTURES LLC

By:  \_\_\_\_\_  
Authorized Representative

Its:  \_\_\_\_\_



**EXHIBIT C-7**

THEODORE RUDNYK  
10143 E CLINTON ST  
SCOTTSDALE, AZ 85260

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

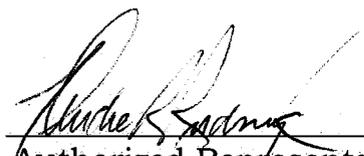
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-042. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

THEODORE RUDNYK

By:   
Authorized Representative

Its: \_\_\_\_\_

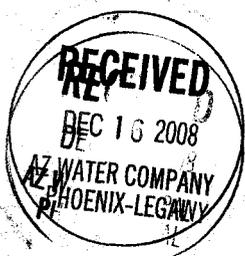


EXHIBIT C-8

YOUREE FAMILY TRUST  
13823 E VISTA VERDE DR  
CHANDLER, AZ 85249

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-033E, and 401-01-033F. I/We still need and desire to receive water service from Arizona Water Company to serve these parcels. My/Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me/us.

Sincerely,

YOUREE FAMILY TRUST

By: Royce R. Youse  
Authorized Representative  
TRUSTEE

Its: \_\_\_\_\_



EXHIBIT C-9

SOUTHPOINT HOLDINGS LLC  
3336 E CHANDLER HEIGHTS RD STE 121  
GILBERT, AZ 82597

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

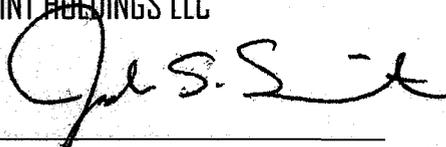
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-21-038. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

SOUTHPOINT HOLDINGS LLC

By:   
Authorized Representative

Its: \_\_\_\_\_



**EXHIBIT C-10**

DEBORAH CROW  
PO BOX 2372  
ARIZONA CITY, AZ 85223

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-029. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

DEBORAH CROW

By: Deborah Crow  
Authorized Representative

Its: \_\_\_\_\_

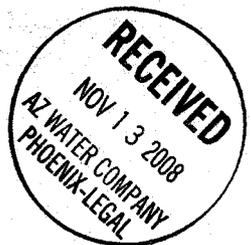


EXHIBIT C-11

DAVID & LINDA ZARATE  
2587 S ARIZOLA RD  
CASA GRANDE, AZ 85222

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-027. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

DAVID & LINDA ZARATE

By:   
Authorized Representative

Its: \_\_\_\_\_



**CAROLINE SMITH**  
159 N SUNSET LN  
COOLIDGE, AZ 85228

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

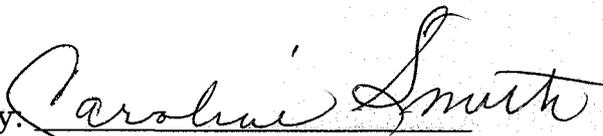
This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-019. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

CAROLINE SMITH

By:

  
Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-13

IRIE ANDERSON  
~~PO BOX 1178~~ *PO 1207 S. Sycamore Ave*  
~~COOLIDGE, AZ 85228~~ *Los Angeles, CA 90019*

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 400-36-003C. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

IRIE ANDERSON

By: *Irie Anderson*  
Authorized Representative

Its: \_\_\_\_\_



**EXHIBIT C-14**

VERTUCCIO FARMS LLC  
3575 N COLONIAL CT  
FLORENCE, AZ 85232

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-035. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

VERTUCCIO FARMS LLC

By:   
Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-15

LELA ANDERSON  
1207 S SYCAMORE AVE  
LOS ANGELES, CA 90019

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 400-36-003B. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

LELA ANDERSON

By:   
Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-16

MICHAEL & JUDY LYNCH  
PO BOX 3086  
CASA GRANDE, AZ 85222

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-36-001A, 401-36-001B, 401-36-002C, and 401-36-002D. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

MICHAEL & JUDY LYNCH

By: *Michael Lynch Judy Lynch*  
Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-17

RAMON VALENZUELA  
PO BOX 286  
QUEEN CREEK, AZ 85242

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-002. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

RAMON VALENZUELA

By: *Ramon Valenzuela* 11-18-008  
Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-18

THOMAS & ANNETTE WORMLEY  
3715 E SAGEBRUSH AVE  
QUEEN CREEK, AZ 85240

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

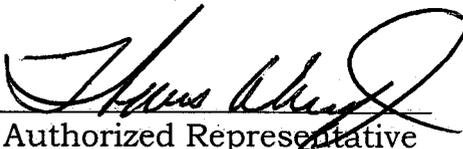
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-031U. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

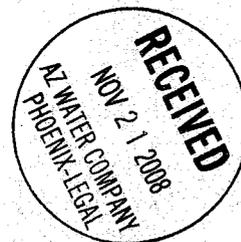
If you have any questions, please feel free to contact us.

Sincerely,

THOMAS & ANNETTE WORMLEY

By:   
Authorized Representative

Its: 



CITY OF COOLIDGE  
130 W CENTRAL AVE  
COOLIDGE, AZ 85228

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 400-38-005, and 400-39-001. The City of Coolidge still needs and desires to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

CITY OF COOLIDGE

By: *Joe Swenkens*  
Authorized Representative

Its: ASSISTANT CITY MANAGER



**EXHIBIT C-20**

FRED & PATRICIA SELLS  
159 N CITRUS LN  
COOLIDGE, AZ 85228

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-035. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

FRED & PATRICIA SELLS

By: 

Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-21

CARLOS & NADINE OCHOA  
PO BOX 3116  
CASA GRANDE, AZ 85222

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-012. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

CARLOS & NADINE OCHOA

By: *Carlos L. Ochoa*  
Authorized Representative

Its: *Carlos L. Ochoa*



EXHIBIT C-22



HELEN BRECK  
2560 14TH AVE  
CARMEL, CA 93923

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 400-38-003. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

HELEN BRECK

A handwritten signature in cursive script that reads "Helen Breck".

By: \_\_\_\_\_  
Authorized Representative

Its: \_\_\_\_\_

**EXHIBIT C-23**

BABBITT FAMILY TRUST  
2566 N MESA DR  
MESA, AZ 85201

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-33-001E. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**BABBITT FAMILY TRUST**

By:   
Authorized Representative

Its: Trustee



EXHIBIT C-24

JOHN NEVITT  
8493 E BELLA VISTA RD  
QUEEN CREEK, AZ 85242

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

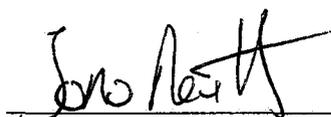
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-033L, 401-01-033M, and 401-01-033N. I still need and desire to receive water service from Arizona Water Company to serve these parcels. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

JOHN NEVITT

By: 

Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-25

MOORE MANAGEMENT INC  
2322 S ROGERS 9  
MESA, AZ 85202

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

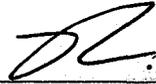
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-037S, 401-01-037T, 401-01-037U, 401-01-037V, and 401-01-037W. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

MOORE MANAGEMENT INC

By:   
Authorized Representative

Its: PRESIDENT



EXHIBIT C-26

RIVER CO-OPERATIVE GIN INC  
PO BOX 1658  
COOLIDGE, AZ 85228

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 209-28-004. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

RIVER CO-OPERATIVE GIN INC

By:

Martin Wurst  
Authorized Representative

Its:

President



**EXHIBIT C-27**

**ENGLAND CATTLE COMPANY**

PO BOX 1268  
COOLIDGE, AZ 85228

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 400-02-004, and 400-03-001. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**ENGLAND CATTLE COMPANY**

By: Robert A. England  
Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-28

DAVID KEITH  
24107 S CLOUD CREEK TRL  
QUEEN CREEK, AZ 85242

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

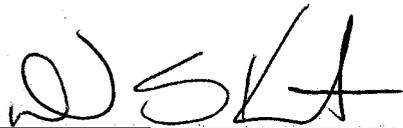
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-033J. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

DAVID KEITH

By:   
Authorized Representative

Its: \_\_\_\_\_



**EXHIBIT C-29**

ALL STATE ASSOCIATES OF LADD FARM 450  
21050 N PIMA RD  
SCOTTSDALE, AZ 85255

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

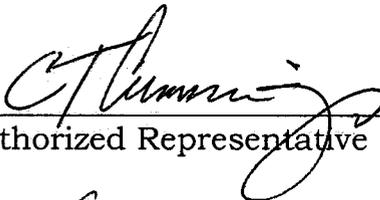
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-35-001A, 401-35-001B, 401-35-001C, and 401-35-002. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**ALL STATE ASSOCIATES OF LADD FARM 450**

By:   
Authorized Representative

Its: 



EXHIBIT C-30

MITCHELL BROOKINS  
P O BOX 933  
KINGS CANYON, CA 93633

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-025. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

MITCHELL BROOKINS

By: \_\_\_\_\_  
Authorized Representative

Its: MB



**EXHIBIT C-31**

ALL STATE ASSOCIATES OF M & G FARM 160  
21050 N PIMA RD  
SCOTTSDALE, AZ 85255

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

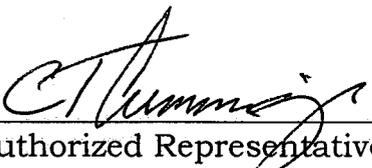
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-21-023. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

ALL STATE ASSOCIATES OF M & G FARM 160

By:   
Authorized Representative

Its: 



**EXHIBIT C-32**

ALL STATE ASSOCIATES OF PINAL II LLC  
21050 N PIMA RD  
SCOTTSDALE, AZ 85255

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

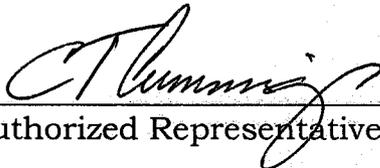
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-037B, 401-01-037D, 401-21-035, 401-21-036, 401-34-001, 401-34-002, 401-34-003, 401-34-005, and 401-34-007. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**ALL STATE ASSOCIATES OF PINAL II LLC**

By:   
Authorized Representative

Its: 



**EXHIBIT C-33**

ALL STATE ASSOCIATES OF HOLLAND II-945  
21050 N PIMA RD  
SCOTTSDALE, AZ 85255

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

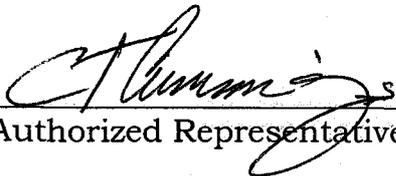
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 400-02-003, 400-03-002, 401-21-004, and 401-34-004. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**ALL STATE ASSOCIATES OF HOLLAND II-945**

By:   
Authorized Representative

Its: 



**VINCENT & MADALINE CAROL CARDINAL**

21247 S 140TH ST  
CHANDLER, AZ 85249

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-35-007. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

VINCENT & MADALINE CAROL CARDINAL

By: Vincent Cardinal & Madaline Cardinal  
Authorized Representative

Its: \_\_\_\_\_



**TRIPLE S ENTERPRISES  
741 N MONTEREY  
GILBERT, AZ 85233**

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

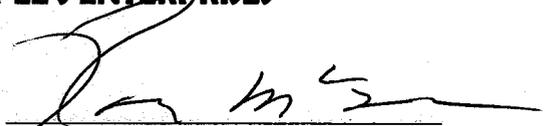
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-21-025A, 401-21-025B. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**TRIPLE S ENTERPRISES**

By:   
Authorized Representative

Its: 



**JESUS PEREZ**  
**464 W ELM AVE**  
**COOLIDGE, AZ 85228**

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-56-006. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

JESUS PEREZ

By: Jesus Perez  
Authorized Representative

Its: \_\_\_\_\_

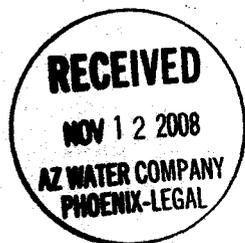


EXHIBIT C-37

PHEASANT FARM LLC  
8250 N GIST PL  
PARADISE VALLEY, AZ 85253

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-38-006G. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

PHEASANT FARM, LLC

*WPH manager*  
By: *Louise M. Berry*  
Authorized Representative

Its: *owner (50%)*  
*owned 50%*



**EXHIBIT C-38**

MYRA GILLESPIE  
202 N 7TH ST  
COOLIDGE, AZ 85228

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N - A.C.C. Decision No. 69386

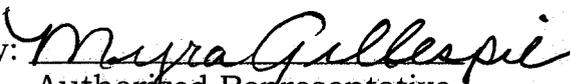
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-34-008. I still need and desire to receive water service from Arizona Water Company to serve this parcel. My current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact me.

Sincerely,

MYRA GILLESPIE

By:   
Authorized Representative

Its: \_\_\_\_\_



EXHIBIT C-39

WESLEY ALAN & KELLI LYNN SUNDERHAUS  
4852 E ENROSE  
MESA, AZ 85205

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-35-003K. We still need and desire to receive water service from Arizona Water Company to serve this parcel. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

WESLEY ALAN &  
KELLI LYNN SUNDERHAUS

By: *Kelli Sunderhaus*  
*Wesley A. Sunderhaus*  
Authorized Representative

Its: Owner





**ON FIRE INVESTMENTS V LLC**

2685 KOREA CT  
HENDERSON, NV 89052

Arizona Water Company  
Attn: Robert W. Geake  
3805 N. Black Canyon Highway  
Phoenix, AZ 85015

Re: Extension of CC&N – A.C.C. Decision No. 69386

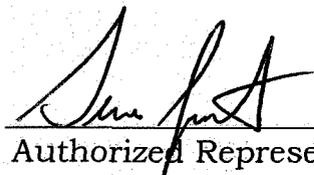
Dear Mr. Geake:

This letter is to follow up with you regarding Pinal County Assessor's Parcel No(s) 401-01-037E, 401-01-037N, and 401-01-037P. We still need and desire to receive water service from Arizona Water Company to serve these parcels. Our current plans include beginning development within twenty-four months if market conditions do not worsen.

If you have any questions, please feel free to contact us.

Sincerely,

**ON FIRE INVESTMENTS V LLC**

By:   
Authorized Representative

Its: M6A

EXHIBIT C-41

**Kathy Harrington**

---

**From:** Nicki Nelson [nickiannn@msn.com]  
**Sent:** Sunday, November 09, 2008 10:25 AM  
**To:** Jackie Craig  
**Cc:** Coolidge CSR; blackland@qwest.net  
**Subject:** Extension of CC&N -A.C.C. Decision No. 69386 - Gurr Lane



ATTN: Robert W. Geake

From: Nicki Nelson  
3627 E Gurr Lane  
Coolidge, AZ 85228

I received a letter from you regarding a certificate of assured water supply for my home in Pinal County. I think you have the impression from the assessor's website that I am the original buyer of a 5 acre plot that now contains four 1.25 lots, since in the letter you inquire about intent to develop. That is incorrect. I only own lot X. Since this is a complicated story I will let you digest this letter and then I hope you will call me.

I just purchased 401-35-008X in August for \$233,000. This is one of four lots in a group that are serviced by a shared well. The lots are U, V, W and X. All are now privately owned except for Lot U, which is still owned by VCS Financial LLC (who I bought from) and is leased to someone who intends to buy. Lot V is privately owned but is for sale or rent and is vacant at this time.

Here is my understanding of how VCS Financial came to own these four homes. The builder is Black Land and Cattle, which is part of VCS. The houses were built by Black Land and Cattle for an investor, and after the building was completed the investor couldn't follow through and VCS Financial bought the four houses back to protect the interests of the builder.

As other homes were being purchased from VCS Financial prior to my purchase, the Pinal County Assessors office moved the information for the group purchase of all four homes from the investor onto the record for Lot X. That's why Lot X still shows a purchase price of \$744,000, which was for all four lots with houses when the builder had to buy them back from an investor. I received the tax notice for this amount and called the assessor, and they assured me that their internal records had the correct data but the website data was wrong.

The four houses are on a shared well, and I am still dealing with issues related to the well that I feel are the responsibility of VCS Financial since the issues existed prior to move-in. The main issue is the supply line, which had one visible break when I moved in (wet ground in front of the first house) and now two other wet areas have appeared in front of the 2<sup>nd</sup> (my house is the 4<sup>th</sup>). Another issue for me as the last house on the line is the inadequate water pressure. I'm not convinced the pump is large enough to service the four houses. Perhaps when they repair the leaks as promised that will improve. And then there is the extraordinary hardness of the well water.

So, as a new occupant of this home I do not feel that I have an assured water supply and would dearly love to receive water supply service from Arizona Water Company to serve my parcel and the other 7 homes (4 others built in 2004 on an unrelated separate shared well) now on Gurr Lane. Availability would encourage the surrounding landowners (Lots K, L and M) to develop and contribute to our neighborhood greatly.

Sincerely,

**EXHIBIT C-41**

Nicki Nelson  
602-692-5010 (cell)  
480-814-6173 (work)