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White Dove Well Water Organization

5520 N Lone Owl Trail, Marana AZ 85653 | 520-401-3974 | whitedovewater@outlook.com

2014 SEP -4 P 12: 33

September 2, 2014

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

ORIGINAL

Docket Control Center
Arizona Corporation Commission
1200 W Washington St
Phoenix Arizona 85007

Please accept the attached letter as addition to our CC&N Application: **W-20911A-14-0294**.

I am available 24 hours a day at (520) 400-6997 for any questions or discussion on our package submission, as well as any additional requirements you may have. Additionally I can be reached at whitedovewater@outlook.com or our home number of (520) 308-6466.

Thank you for your time and consideration.

Niama M Duarte

Owner

Arizona Corporation Commission
DOCKETED

SEP 4 2014

DOCKETED BY

White Dove Well Water Organization

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September 2, 2014

Docket Control Center
Arizona Corporation Commission
1200 W Washington St
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Subj: Request for Categorical Exclusion to NEPA Requirements for CC&N Application

Ref: (a) Application for Certificate of Convenience and Necessity – White Dove Water
- Docket Number **W-20911A-14-0294**

Ref: (b) 40 CFR 1507.3 and 1508.4

To Whom It May Concern;

Please accept this document as an attachment to reference (a) request.

This document is submitted to request a Categorical Exclusion (CATEX) to the requirements of reference (a) for the completion of an environmental assessment (EA) or an environmental impact survey (EIS) for our Well Water Services project.

In accordance with the National Environmental Policy Act (NEPA) guidance on Categorical Exclusions, published by the Council on Environmental Quality (CEQ) on November 23, 2010, a CATEX can be granted for those projects that do not represent a significant detrimental impact to the environment, or to which a previous assessment has been conducted and is applicable. Based on the type of project we are contemplating, as well as the current existence of same-type facilities in our area, White Dove Water feels that a CATEX does apply to our overall project and therefore should be considered within the guidelines of reference (b) and the CEQ guidance for CATEX projects.

PROJECT OVERVIEW AND BASIS FOR REQUEST

As outlined in our Scope of Work for White Dove Water, our project consists of the drilling of a well, with associated peripheral equipment (Tank / Pumps / Boosters / Bladders / Transmission Lines, etc.). Currently, there are three other operational wells in our area: two shared wells (which we are attempting to replace because of deficiency and health and safety issues), and one which was recently drilled by a private landowner for his own use. Based on the existence of those wells, it can be assumed that an appropriate environmental assessment or environmental impact statement was either completed for this area, or an

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exclusion was applied for and received, since an assessment appears to be a requirement for drilling.

Unfortunately, for the two shared wells that we are replacing with our project (for which ownership and title, as well as system quality, are suspect) we have been unable to find any EA or EIS documentation. Those wells are registered with the Arizona Department of Well Registry under 55-578801 and 55-206619. For the private well recently drilled in this area, we are also unable to find an EIS or EA document (well 55-916187). However, if in fact an EA or EIS is a requirement for drilling, it can be assumed that the assessment(s) were completed and are applicable to our project, or a CATEX was granted that would be applicable to our requirements, but are not available for viewing by the general public. It is requested that if an EIS or EA exists for those projects, that those documents be provided and verified for exclusion purposes to our project. Or alternatively, if there is no EA or EIS filed for those projects, please inform us directly.

There are four (4) other non-operational wells in this area.

In addition to the potential of existing surveys, it should be noted that in the summer of 2012, a broad Environmental Assessment (EA) and comprehensive review of our surrounding area was completed by the City of Tucson for their "*City of Tucson Avra Valley Habitat Conservation Plan*" project. That assessment was completed in June 2012, and provides justification that water projects of the type being proposed by White Dove Water do not significantly impact the habitat and wildlife/natural resources of this area. The plan can be found at the following link:

http://www.tucsonaz.gov/sites/default/files/ocsd/avra_valley_hcp_summer_2012_prelim_draft_06292012_figures_appended.pdf

SUMMARY

A categorical exclusion to the requirements for the completion of an environmental assessment (EA) or an environmental impact statement (EIS) is requested by White Dove Water for our referenced CC&N application, in accordance with the contents of this letter and the negligible effect, based on historical precedence that the project would have on the environment.

Thank you for your review and consideration.

Sincerely,



Niama M Duarte
Owner - White Dove Well Water Organization