



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Utah State Office  
440 West 200 South, Suite 500  
Salt Lake City, UT 84101-1345

NOV 22 2019

In Reply Refer To:  
7250 (UT-933)

Kent L. Jones, P.E.  
State Engineer, Utah Division of Water Rights  
P.O. Box 146300  
Salt Lake City, UT 84114-6300

Dear Mr. Jones:

Thank you and the other representatives of the Utah Division of Water Rights (Division) for holding the public meeting in Eskdale, Utah, on September 26, 2019 to discuss the Division's current appropriation policy for Snake Valley (Area 18) and possible changes to the policy. The purpose of this letter is to follow-up with written comments on what the Bureau of Land Management (BLM) Utah believes would be practical and necessary changes to the existing policy. We support state and federal partnerships that are necessary to the successful management and protection of water-dependent resources in Utah and, in particular, BLM's surface water and ground water rights in Snake Valley.

BLM Utah reasons for supporting a change in the current appropriation policy for Area 18 are as follows:

- The ground water diversions in central Snake Valley, between Garrison and Partoun, appear to exceed the safe yield of the localized ground water system. As a result, we believe that this situation places the local agricultural economies at risk by endangering investments in water developments on the private lands used for irrigation purposes and the BLM-managed lands used for livestock grazing.
- Three critical sources of water in Snake Valley relied on by the BLM have already lost artesian flows. The critical water sources are: (1) Needlepoint Spring (Water Right No. 18-571), which lost its artesian flow in 2001; (2) West Buckskin Well (Water Right No. 18-555), which lost its artesian flow in 2015; and (3) Kane Spring (Water Right No. 18-406), which lost its artesian flow in 2018. At other critical water sources for BLM water rights in Snake Valley, surface water flows have declined nearly to zero. We believe that such loss of flow at these sources undermines both the BLM's duty and ability to manage the public lands for multiple uses, and the local economies dependent on these water sources for livestock grazing and other uses.

INTERIOR REGION 7 • UPPER COLORADO BASIN

COLORADO, NEW MEXICO, UTAH, WYOMING

RECEIVED

DEC 02 2019

WATER RIGHTS  
SALT LAKE LP

SCANNED LP