



United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470

MAY 9 2011

IN REPLY REFER TO:

LC-4220
WTR-4.03

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. Kevin Kelley
Interim General Manager
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251-0937

Subject: Verification of 2009 Extraordinary Conservation Intentionally Created Surplus
Created by the Imperial Irrigation District (IID)

Dear Mr. Kelley:

The *Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead* (Interim Guidelines) establishes the requirements for the creation, delivery, and accounting for Intentionally Created Surplus (ICS). Section 3.B.1 of the Interim Guidelines requires a Contractor to submit a plan for the creation of ICS to the Secretary of the Interior for review and approval prior to the creation of ICS. Section 3.D.1 requires the Contractor to submit a Certification Report containing appropriate information which demonstrates the amount of ICS created and that the method of creation was consistent with the Contractor's approved ICS plan. Section 3.D.2 requires the Secretary, acting through the Lower Colorado Regional Director, to verify the information submitted and provide a written decision to the Contractor regarding the amount of ICS created.

The following chronology documents how the above requirements were met regarding IID's creation of Extraordinary Conservation ICS during calendar year 2009:

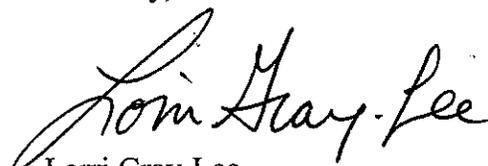
- By letter dated December 8, 2008, IID submitted to the Bureau of Reclamation its plan for the creation of Extraordinary Conservation ICS during calendar year 2009 (ICS Plan). As outlined in this ICS Plan, IID sought approval to create up to 25,000 acre-feet of ICS through the implementation of a fallowing program, and up to 12,000 acre-feet of ICS through the implementation of a main canal seepage interception project, for a total ICS volume not to exceed 25,000 acre-feet.
- After consultation with the Lower and Upper Basin States, Reclamation approved IID's ICS Plan by letter dated August 6, 2009.
- In accordance with IID's ICS Plan, Reclamation conducted an independent field verification of 5 percent of the acres in the IID fallowing program. Reclamation's report, documenting the inspection and confirming that extraordinary conservation was implemented in accordance with the approved ICS Plan, was signed on March 4, 2010.

- By letter dated April 6, 2011, IID submitted to Reclamation its ICS Certification Report demonstrating the creation of 12,000 acre-feet of ICS through implementation of the main canal seepage interception project. IID determined that its following program yields were insufficient to provide ICS credits and, as a result, claimed no ICS credit from this program for calendar year 2009.

In accordance with Section 3.D.2 of the Interim Guidelines, I hereby verify and make a final determination that IID created 12,000 acre-feet of Extraordinary Conservation ICS during calendar year 2009, prior to accounting for the one-time deduction of 5 percent for the benefit of additional system storage in Lake Mead, as outlined in Section 3.B.2 of the Interim Guidelines.

If you have questions, please contact Mr. Paul J. Matuska, Water Accounting and Verification Group Manager, at 702-293-8164.

Sincerely,



Lorri Gray-Lee
Regional Director

cc: Mr. Christopher Harris
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